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# Tip of the Binberg

Exploring the full cost of waste crime in Greater Manchester



Prepared by Beasley Associates & Ray Georgeson Resources (RGR) for Dsposal & GC Business Growth Hub

Comissioned by:



Prepared By:



Supported by:



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## Executive Summary

Beasley Associates and RGR were commissioned by Dsposal, supported by the GC Business Growth Hub, to deliver a study on waste crime in Greater Manchester with a focus on fly-tipping. The research assessed the costs of waste crime in the region, considered why and how waste crime happens, analysed public awareness of their legal duties with waste and identified opportunities to intervene, recognising that local authorities, businesses and communities are tackling the challenge and building momentum for their efforts.

Fly-tipping is a significant and persistent problem in Greater Manchester, with local authorities reporting nearly **53,000 separate incidents in 2016/17 – 144 incidents for every single day of the year**, producing an estimated average of nearly **20,000 tonnes of illegally dumped waste** that year.

This endemic illegal activity has a notable negative effect on the Greater Manchester economy. It cost the councils of Greater Manchester nearly **£4.9 million in 2016/17** in clearance and enforcement costs, with the revenue from fines and Fixed Penalty Notices barely making a dent in this cost. In addition, a conservative average estimate of **around £750,000** represents income lost by not recycling these materials and further to this, Her Majesty's Revenue and Customs loses out on VAT and Income Tax on an element of the **estimated £3 million** a year generated in cash sales by 'man and a van' operators providing waste clearance services in and around Greater Manchester.

The circumstances in which this persistent but relatively low-level waste crime breeds are encouraged by the prioritisation by the public of low cost and convenience when choosing waste clearance services (as evidenced by the research commissioned from YouGov), rather than compliance with the public's Duty of Care. Awareness of public legal obligations on waste is low and confused and this is capitalised upon by several 'man and van' waste clearance operators who obfuscate even the best-intentioned members of the public trying to 'do the right thing' and deal with their waste properly and legally.

The councils of Greater Manchester are tackling the challenge of fly-tipping and have achieved some success despite the severe restrictions on the resources available to them and the limited effect so far of national campaigns to raise awareness of legal responsibilities on waste for business and householders alike.

To make further headway in tackling fly-tipping across Greater Manchester requires all those with an interest to collaborate and build on the substantial efforts already being made in the face of an endemic problem. We have offered some broad recommendations for further consideration.

- a) Highlight the cost of fly-tipping clearance in any new communications campaigns, as this is money that could be better spent on other local authority services. This approach of using hard hitting financial facts does seem to resonate and find traction with residents who may be less receptive to environmental campaigns.

- b) Seek to recover more of the costs of clearance through fines and enforcement activities, which presently contribute only modestly towards the total costs. This will require a greater investment in enforcement activities, however it is possible for a sound business case to be developed based on future cost avoidance.
- c) Devise new communications to localise messages about the importance of staying within the law and being aware of Carriers' Licences and Waste Transfer Notes. This could include targeted social and print media advertising, alongside the waste clearance adverts so that they have prominence in juxtaposition to the classified advertisements and social media pages.
- d) Focus general communications activity on the need for local action, and highlight distinctive local issues such as back alleys, utilising the existing good practice work of agencies such as Keep Britain Tidy and well developed local campaigns such as Hertfordshire Waste Partnership's Fly-Tipping Campaign.
- e) Engage the Environment Agency (EA) by consistently supporting them with intelligence on illegal operators, including reporting advertisers erroneously using the EA logo to gain credibility for their service.
- f) Simplify how householders and businesses can access quality assured information about legal, compliant collectors and waste managers. This could involve some form of validation service for collectors and operators, involving a new collaboration between the GMCA, the ten local district authorities of Greater Manchester, the Environment Agency, representative trade bodies such as the ESA and the Chartered Institution of Wastes Management, utilising the expertise of service providers such as Dsposal.
- g) Further research should be commissioned which investigates the true level of knowledge and understanding amongst businesses about their duty of care and explores their main drivers in terms of selecting disposal services. This will provide evidence to judge whether there is any parity between the householder view and local businesses and help provide focus for any subsequent targeted campaign work.

# 1. Setting the Scene

## 1.1 Introduction

Beasley Associates and RGR have been commissioned by Dposal, supported by the GC Business Growth Hub, to deliver a study on waste crime in Greater Manchester. The research aims to assess the costs of waste crime in the region, considering why and how waste crime happens and identify opportunities to intervene, recognising that local authorities, businesses and communities are seeking to tackle the challenge and build more momentum for their efforts.

Dposal are a Manchester-based tech start-up with a unique approach to making it as simple as possible for everyone to make sure they are legal and compliant when disposing of waste. They have commissioned this research to broaden the understanding of the impact of waste crime in Greater Manchester, raise awareness of the ability and ease with which waste can be managed correctly and support the identification of actions that can boost the demand to tackle waste crime and ultimately deliver both environmental and economic benefits in Greater Manchester.

The research is timely, with increased attention being paid to waste crime at local and national levels. In recent years, assessments<sup>1</sup> of the cost to the nation of waste crime (estimated at more than £600 million a year) have significantly raised the profile of the issue and led to policy reviews in Government, most recently including the recent Call for Evidence by Defra's Serious and Organised Crime Review<sup>2</sup> and the current consultation<sup>3</sup> on the Household Waste Duty of Care and guidance for councils on issuing fixed penalty notices.

## 1.2 Project Scope

There are many aspects to waste crime, covering a range of different areas including: illegal waste sites; permit breaches; illegal exports, illegal burning of waste and of course, fly-tipping, which is the focus of this report. Fly-tipping is a dominant feature of waste crime in the UK – of the estimated £604m economic impact of waste crime (in 2015) identified in the Eunomia/ESA report, over third of these costs can be attributed to fly-tipping.

The scope of the research includes:

- The Cost of Waste Crime - reviewing local authority costs associated with cleaning up after fly-tipping, and costs associated with investigations and prosecutions; consideration of associated financial costs such as private landowners paying for clearance of waste on their land, fines to those found to have broken the law,

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<sup>1</sup> Eunomia Research and Consulting (2017) *Rethinking Waste Crime* report for the Environmental Services Association [http://www.esauk.org/esa\\_reports/20170502\\_Rethinking\\_Waste\\_Crime.pdf](http://www.esauk.org/esa_reports/20170502_Rethinking_Waste_Crime.pdf)

<sup>2</sup> Defra (2018a) Serious and Organised Crime Review –Call for Evidence, consultation at <https://www.gov.uk/government/consultations/serious-and-organised-waste-crime-review-call-for-evidence>

<sup>3</sup> Defra (2018b) Consultation on the household waste duty of care, at <https://consult.defra.gov.uk/waste/consultation-household-waste-duty-of-care/>

consideration of potential income for illegal waste operators and the economic impact this has on legal waste companies; estimation of the loss of value in the waste itself through disposal; additional environmental costs including impact on communities blighted by fly-tipping.

- Why and How Waste Crime Happens - identifying those who are responsible for committing waste crime; consideration of the reasons that they do it and how the system allows this to happen; reviewing how individuals are made aware of the laws and whether they are made aware of the true costs of fly-tipping.
- Opportunities to Intervene - consideration of what interventions could be used and at what stage individuals could be intercepted and diverted away from making illegal choices.

### 1.3 Our approach to the project

Waste management is a policy area notorious for the variability and availability of data, and this proved to be the case in assembling data for this study. Our approach combines the careful assembly of existing data from the Greater Manchester local authorities, Defra and the Environment Agency, evaluation of national studies on fly-tipping, interviews with and case studies from selected authorities in Greater Manchester and beyond. Alongside this assembly of existing data and case studies, two distinctive additional elements of original research have been assembled. Firstly, we constructed a piece of action research in which a wide sample of Greater Manchester local newspapers were scrutinised for classified advertisements for waste clearance and we developed a scenario to contact these operators to assess their approach to compliance with waste legislation. Secondly, we advised Dposal on commissioning original opinion research from YouGov in which a representative sample of Greater Manchester adults were interviewed to determine their awareness of their legal duties on waste, identify the main places they might look to find a local waste service, and what they found important in choosing a service.

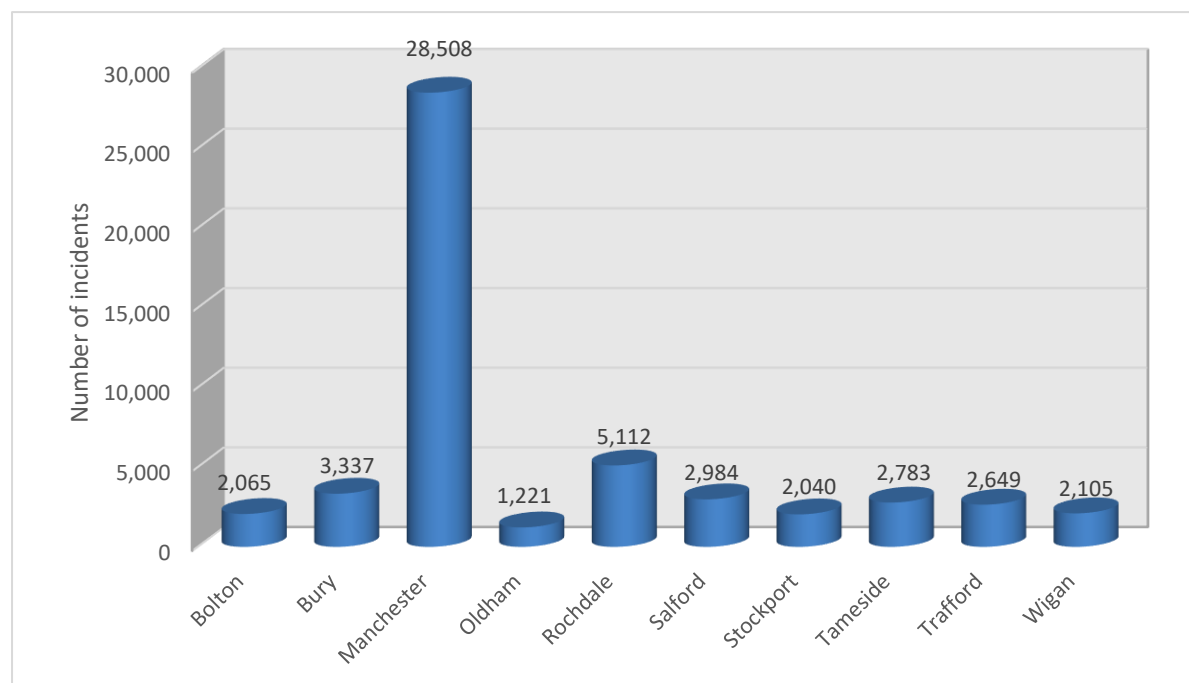
Combined, these sources of information provide the assembled evidence from which we draw several conclusions and recommendations. At various points, where data sources are limited, and assumptions must be made, we endeavour to always provide conservative estimates and identify our methodology in the interests of transparency.

## 2. Fly-tipping in Greater Manchester – the size of the challenge

### 2.1 The basic data – numbers of incidents and tonnage

Fly-tipping in Greater Manchester remains a significant and widespread problem. In 2016/17 there were a **total of 52,804 fly-tipping incidents** reported by councils across Greater Manchester, with the largest number occurring in Manchester (28,508) and the lowest number occurring in Oldham (1,221) (Figure 1).

Figure 1: Fly-tipping incidents reported in Greater Manchester, 2016-17



Some Greater Manchester authorities have experienced a decline in the number of incidents compared to recent years and this may well reflect the work that is already being undertaken to manage and prevent fly-tipping (as we note in case studies later in this report) (refer to Figure 2). For others the problem is not yet under control and the number of recorded incidents continues to grow. However, overall the number of incidents remains a challenging issue for all authorities in both an environmental and economic perspective, with resources having to be channelled into addressing the clean-up, enforcement and the prevention work.

Reports of incidents of fly-tipping recorded on private land in Greater Manchester have been much harder to collate, with little data readily available. This is largely because any waste fly-tipped on private land is the landowner's responsibility and not the local authority's, however local authorities do assist, in varying degrees, in providing support for enforcement and prosecution purposes. Only Bolton has provided this data, reporting 105 incidents in 2016/17. In an absence of any other data, a reasonable approach to estimation would be to simply take the proportion of private land incidents in Bolton compared to the



public land incidents and extrapolate. This basic approach provides an estimate of an additional 2,692 incidents on private land across all ten authorities.

Recording of the tonnage of materials fly-tipped is also patchy across Greater Manchester, with three authorities providing tonnage data. Some authorities could not extract accurate data that purely relates to fly-tipping incidents because of the way it is collected and recorded; the data contains other tonnages. However, it is clear from Table 1 that the tonnage figure does not reflect the number of incidents, therefore extrapolating this data to get a regional figure based on the total number of incidents is more challenging.

Figure 2: Fly-tipping incidents reported in Greater Manchester, 2013/14 to 2016/17

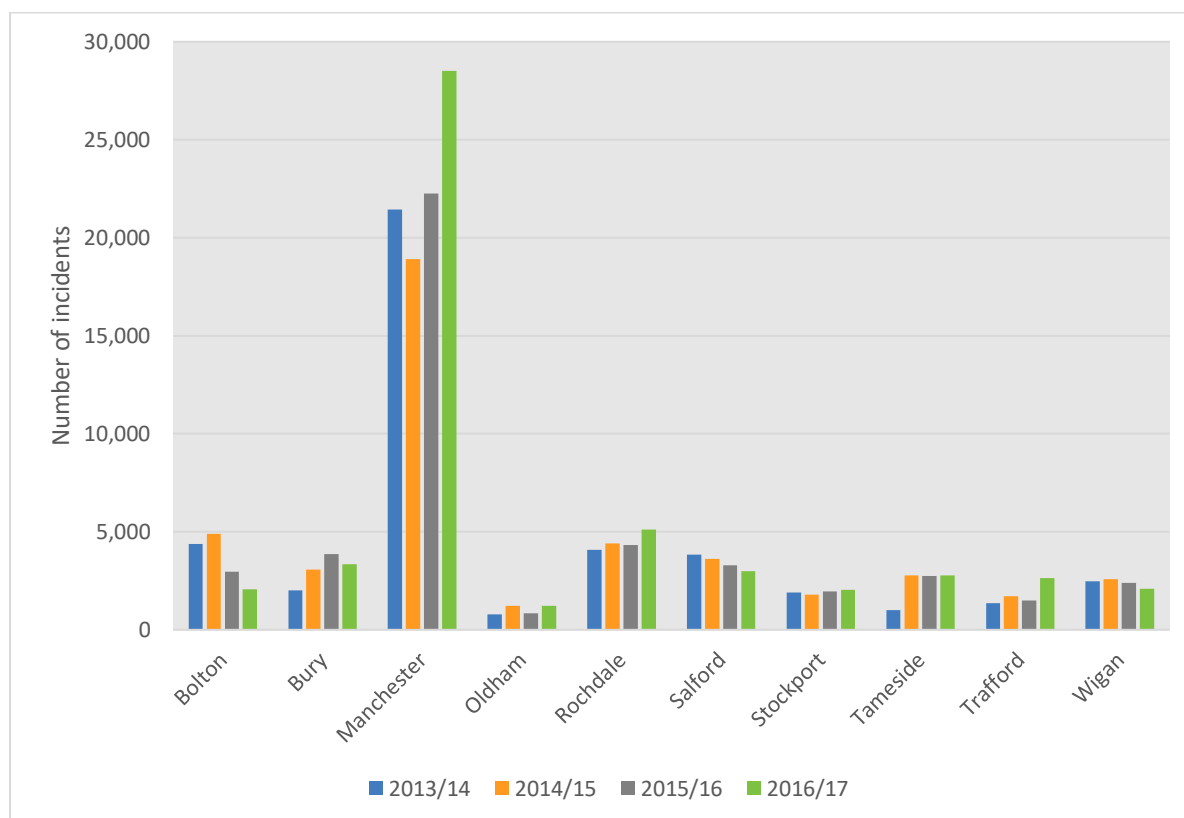


Table 1: Recorded tonnage from fly-tipping in 2016/17

Authority	Number of Incidents	Tonnage
Manchester	28,508	
Rochdale	5,112	685
Bury	3,337	
Salford	2,984	1,401
Tameside	2,783	
Trafford	2,649	
Wigan	2,105	
Bolton	2,065	962.06
Stockport	2,040	
Oldham	1,221	

Whilst it's heavily caveated, we have made reasonable assumptions and provided a possible range to estimate total tonnage data in relation to the incidents. Both Bolton and Salford's data equate to 0.47 of a tonne fly-tipped per incident, with Rochdale's being much lower at 0.13 of a tonne per incident. We have used this range to extrapolate across the incidents reported for the other councils and included an average figure of 0.36 tonnes per incident to give some order of magnitude for tonnage dumped. The Summary Table in Appendix 1 records this data, as well as including unverified website reports of tonnage for two other councils, which fall within the range identified.

Using these assumptions and extrapolation, the tonnage fly-tipped on public land in Greater Manchester in 2016-17 is 8,592 tonnes at the lower end and 23,090 tonnes at the higher end, with an average estimation of 18,400 tonnes. Using the same formula applied to our estimate of the number of incidents on private land, an additional tonnage of between 350 tonnes at the lower end and 1,265 at the higher end, with an average of 969 tonnes, can be added to the public land figures.

In total therefore, we estimate that **between 8,942 and 24,357** tonnes of rubbish was fly-tipped in Greater Manchester in 2016-17 with an average estimate of **19,369 tonnes**.

We readily acknowledge that this data is significantly caveated, but it is based on a reasonable body of recorded data from the local authorities. To sense check it, estimating around 20,000 tonnes of materials fly-tipped from over 55,000 incidents on public and private land reasonably chimes with the broader story about the locations, types and sizes of incidents and the likely weights of materials that would be carried by different vehicle types.

## 2.2 The locations and size of fly-tipping incidents

Highways and back alleys feature heavily as the main locations for fly-tipping in Greater Manchester, for all authorities; back alleys being a distinctive feature and characteristic of these areas. This is illustrated in Figure 3.

The number of incidents reported by the local authorities on agricultural land, water courses/ banks, and railways were negligible and have therefore been excluded from Figure 3. Of course, we recognise that, where this land is privately owned, there is no formal requirement for local authorities to report on this data and we assume that the low number of incidents will not necessarily be representative of all areas.

However, this recorded data chimes with the national picture, in terms of the dominance of highways as the primary location of fly-tipping incidents.

Nationally recognised categories are used to analyse fly-tipping incident size, and 'small van load' dominates in reported incidents across all authorities, although in Bury and Manchester 'transit van load' is equitable. This compares to the national pictures, where most fly-tipping incidents are equivalent to a 'small van load'. 'Car boot' size also counts for

a significant number of incidents across most of the local authorities. Figure 4 summarises incident size, by authority area.

Figure 3: Location of fly-tipping incidents in Greater Manchester, 2016-17

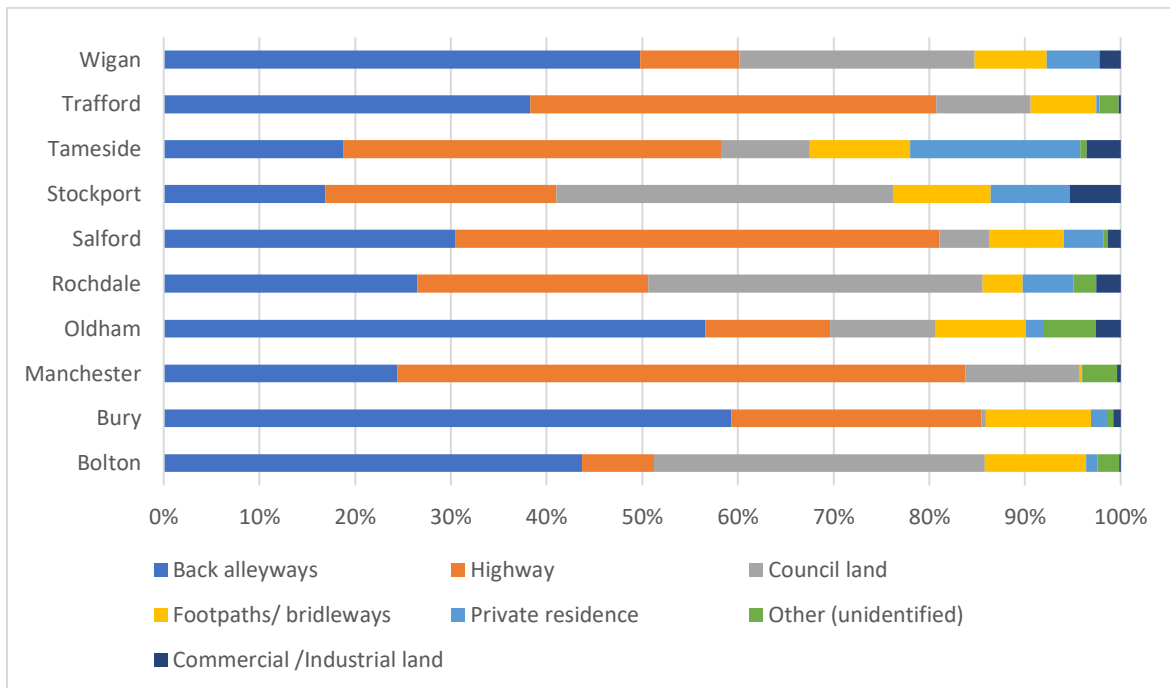
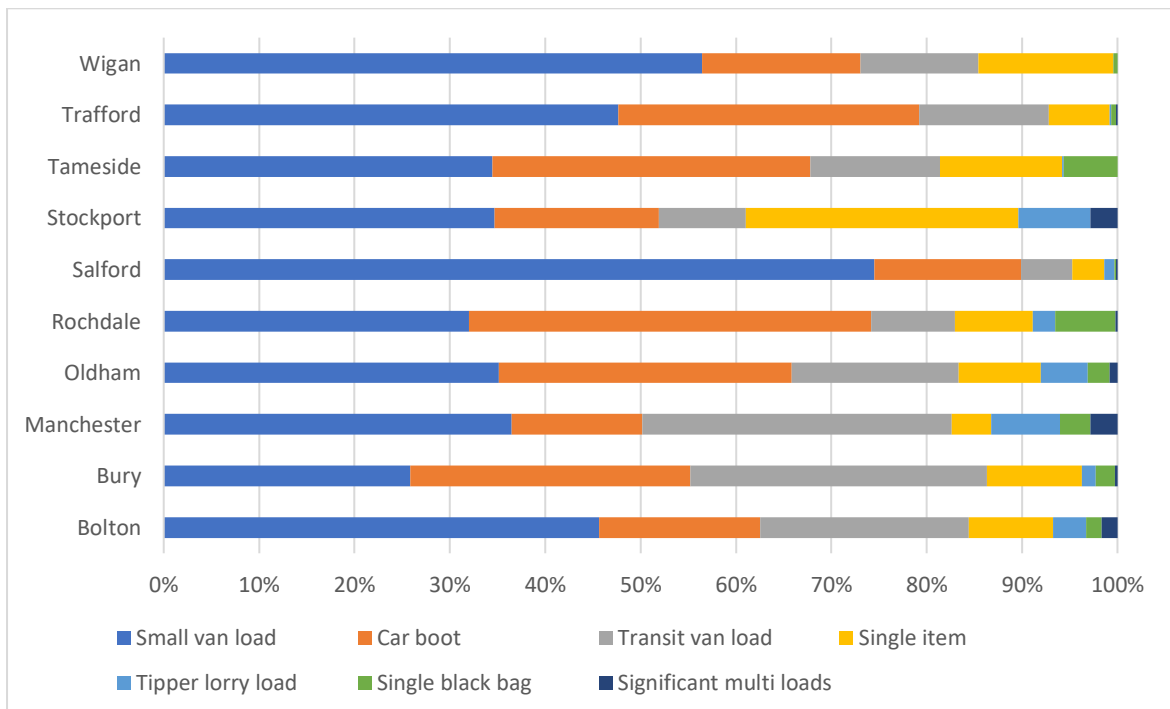


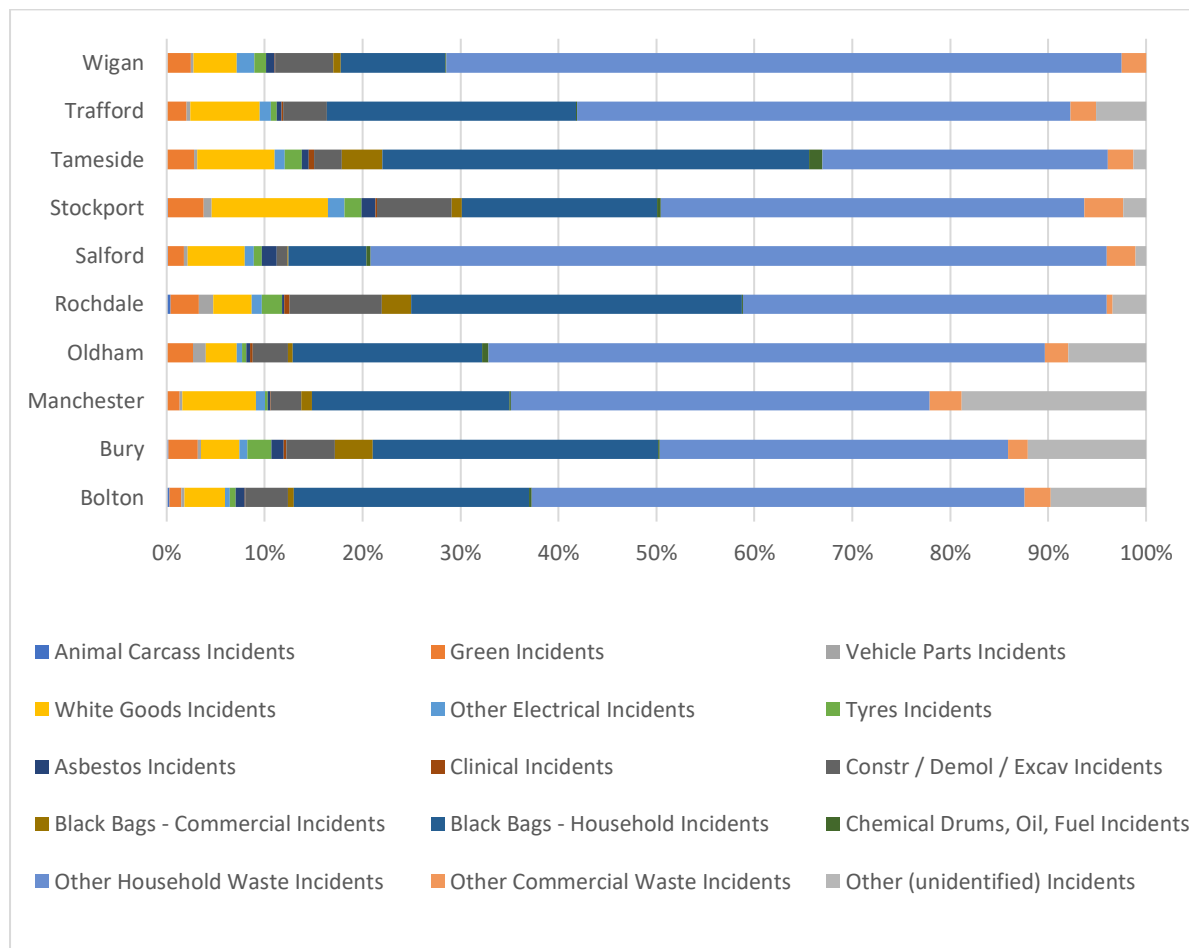
Figure 4: Fly-tipping incidents in Greater Manchester by size, 2016-17



### 2.3 Types of fly-tipping and the value of materials lost

Categorisation of the type of waste being fly-tipped also follows national guidance. In Greater Manchester, the dominant waste type category is ‘Other Household Waste’, followed by ‘Black Bags: household’ (refer to Figure 5). Again, this reflects the national picture.

Figure 5: Waste type by incident in Greater Manchester, 2016-17



Fly-tipped waste, if sorted properly and disposed of correctly, could have some value in relation to the potential to recycle at least a proportion of it. The composition of fly-tipped waste is variable but likely to comprise of some recyclable materials. In seeking to estimate the lost value in fly-tipped materials, we have again applied a conservative assumption that a maximum of 40% of this material could be recycled and broadly comprises of a mixture of the materials commonly found in household bins. Using our estimated range of between 8,942 and 24,357 tonnes of rubbish fly-tipped in Greater Manchester in 2016-17 with an average estimate of 19,369 tonnes, and a ‘basket price’ of £100/tonne currently for the mixture of materials commonly recycled by households<sup>4</sup>, a conservative estimate of the value lost in fly-tipped materials in Greater Manchester would be between **£357,680 and**

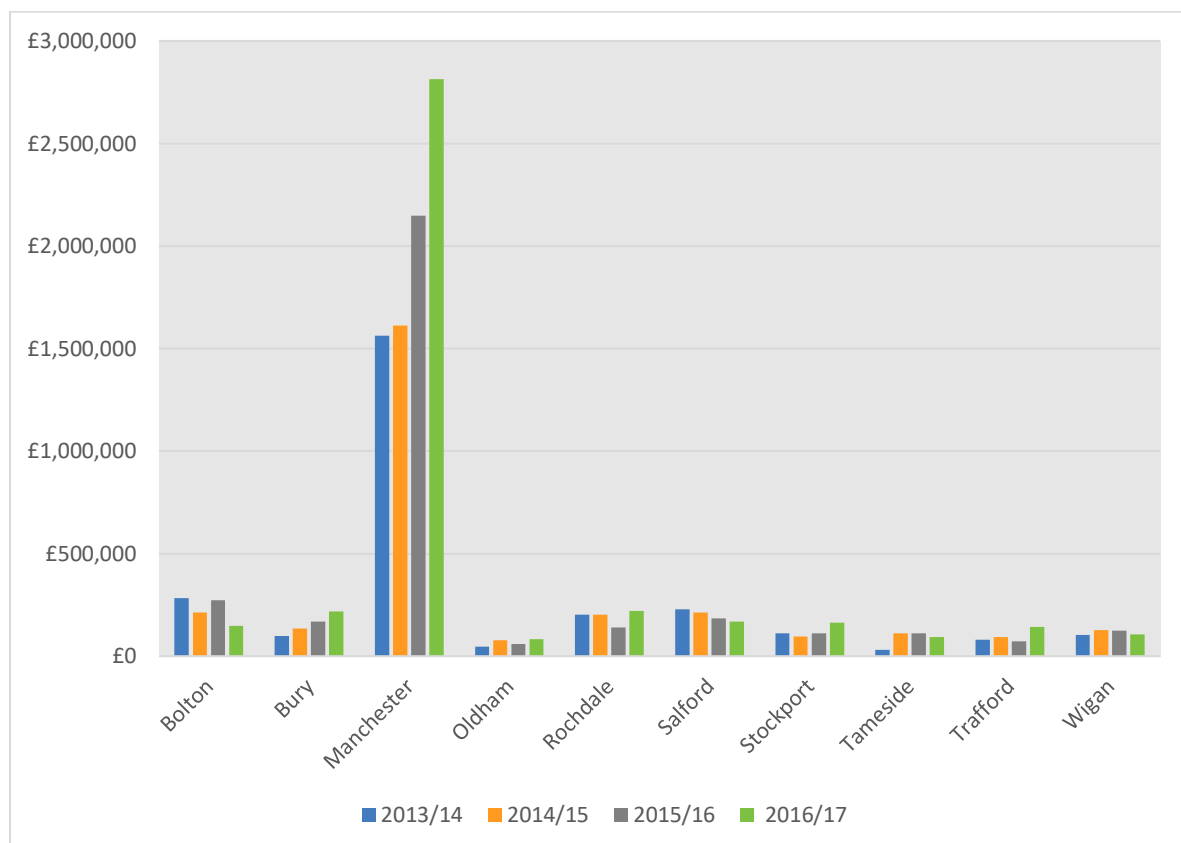
<sup>4</sup> ‘Basket price’ of £100/tonne is based on real-time market intelligence gathered from recycling collection businesses we work with, based on July 2018 commodity prices.

**£974,280 with an average of £774,760.** Even if only 10% of the fly-tipped materials were deemed capable of being recycled (a low estimate), this would still estimate a range of £89,420 to £243,570 of material value loss, with an average of £193,690. Considering the assumptions made, even simply based on 52,804 incidents reported in 2016/17, it is reasonable to assume that **several hundred thousand pounds of material value** is being lost to the Greater Manchester economy, as well as the actual costs incurred by councils and landowners of dealing with the clearance of fly-tipped rubbish.

## 2.4 The costs of clearance

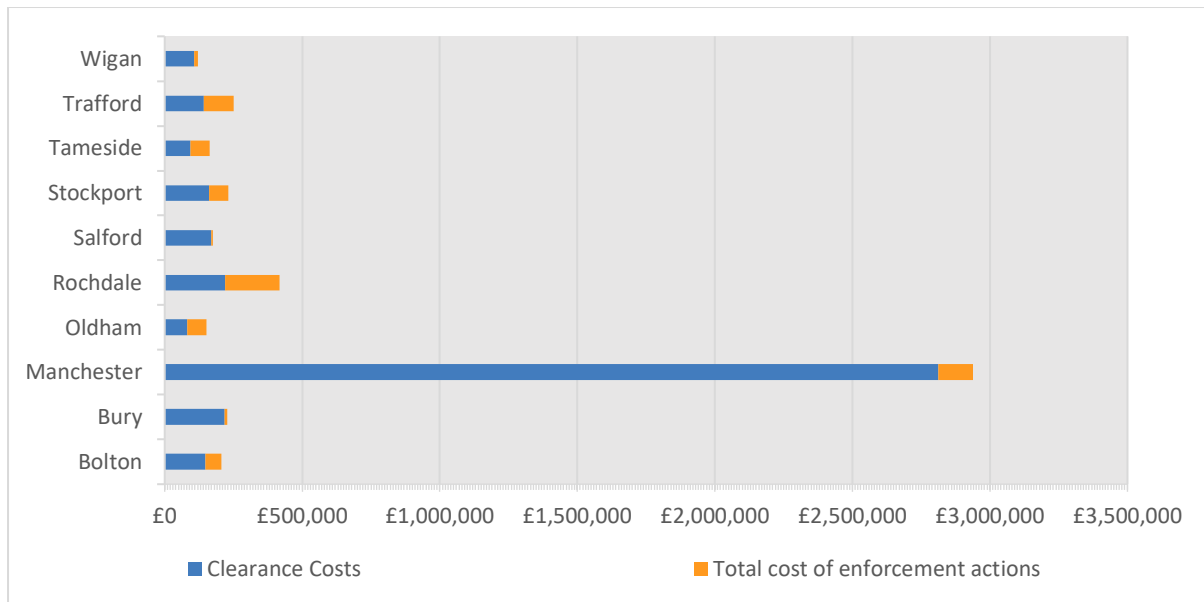
Clearance costs of fly-tipping for Greater Manchester authorities are significant and broadly relate to the numbers of incidents by council. A detailed breakdown is provided in the Summary table in Appendix 1, but the overall cost to Greater Manchester authorities of clearance in 2016-17 was **£4,152,907** with Manchester City Council carrying the largest burden of clearance costs for over 28,000 incidents (refer to Figure 6).

Figure 6: Clearance costs for fly-tipping in Greater Manchester, 2013-14 to 2016-17



Add in the associated enforcement costs of dealing with the fly-tipping problem and the total spend for Greater Manchester authorities for 2016/17 reaches **£4,883,344** (refer to Figure 7)

Figure 7: Clearance and enforcement costs, 2016-17



## 2.5 The hidden cost to the region – revenue generated by illegal operators

In building the layers describing the real-time costs of dealing with fly-tipping we sought to estimate the possible revenue being generated from fly-tipping, based on our understanding of the prevalence of small-scale incidents and the ubiquitous operators that trade in cash and advertise intermittently their services in the ‘man and van’ category we are all familiar with. Again, assumptions need to be made but we have chosen conservative estimates of income and frequency to build a picture.

In Chapter 4 we describe in detail the exercise we undertook to investigate the reality of small-scale waste clearance in Greater Manchester and the frequency with which it was clear that operators were in business without any due attention to legal compliance. In our investigations, we speedily discovered the ‘going rate’ for small-scale waste clearance from households in Greater Manchester and have used this as a basis for estimates.

This ‘going rate’ was £50 to collect a double bed and mattress and chest of drawers, which equates to a small van load. Using the breakdown of fly-tipping incidents by vehicle size (noted in detail in Appendix 1) and estimates for cash exchanges for differing load sizes (based on market intelligence gained), Table 2 conservatively illustrates how much money is being generated by likely illegal waste collectors in Greater Manchester in 2016-17 – **around £3 million** as a conservative estimate.

Table 2: Estimated revenue generation by 'man and van' operators in Greater Manchester, 2016-17

Load type	Estimated cash transaction	Number of incidents	Total
Small van load	£50	20,183	£1,009,150
Transit van load	£75-100	12,600	£945,000 - £1,260,000
Car boot load	£25	10,336	£258,400
Tipper lorry load	£250	2,544	£636,000
<b>Total</b>			<b>£2,848,550 – £3,163,550</b>

It is difficult to take this estimate much further, but, given the cash nature of most of these small-scale waste clearance transactions, that Her Majesty's Revenue and Customs is likely to be missing out on both VAT revenue and Income Tax revenue as a proportion of £2.85 million to £3.16 million which is being lost to the mainstream economy. At the same time, local authorities are carrying the burden of over £4 million of clearance costs from which only a modest contribution is recouped through enforcement activities such as Fixed Penalty Notices, fines and prosecutions. It illustrates starkly the size of the challenge the local authorities face.

## 3. Responding to the scourge of fly-tipping – the approaches of the Greater Manchester authorities

### 3.1 Local Authority Activities

All local authorities across Greater Manchester are addressing fly-tipping to varying degrees and information on their activities and priorities is readily accessible online. The summaries and overviews provided below were assembled using a mixture of primary and secondary publicly available information.

**Manchester** has active compliance and environmental crimes teams who have successfully brought prosecutions against individuals and businesses for fly-tipping. An important part of their work, in securing the evidence required, appears to be CCTV monitoring and securing reports of incidents from residents. A significant challenge remains with fly-tipping in back alleys and this is an area that continually attracts negative press attention. In terms of communications Manchester has recently launched their ‘Keep Manchester Tidy’ campaign; a partnership between the Council and Keep Britain Tidy. It aims to make Manchester the first ‘Tidy City’ in the UK by the year 2020 and has several key organisations participating in the campaign to consider ways they can support Manchester in becoming cleaner, less littered, and more recycling-friendly

**Stockport** encourages their residents to report any fly-tipping incident and an online function is available to do this. They are very clear in their council online information of the consequences of fly-tipping in terms of the penalties they impose, stating the level of fines and potential prison sentences with the more serious incidents. In terms of communication and engagement, in March 2018 they launched the ‘We Love Stockport’ campaign. This is a concerted effort to actively tackle unacceptable behaviour around waste and litter, and the authority is working with local communities, businesses and landowners to tackle problem areas.

**Oldham**, as with Stockport, encourage their residents to report fly-tipping incidents and an online facility is available for them to do this. To ensure residents remain engaged in the process they can track the progress of their case and see what action is being or will be taken. Oldham also take the approach of being very open with residents as to the impact of fly-tipping, highlighting successful prosecutions online and sharing with local media and social media outlets.

Although results to date have been mixed and on a very small scale, Oldham have also been engaged in exploring whether community action can cut fly-tipping, focusing on resident action and motivation to clean up their local areas and work collectively to prevent back alley fly-tipping<sup>5</sup>.

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<sup>5</sup> <https://www.hubbub.org.uk/blog/can-community-action-cut-fly-tipping>



**Rochdale** also actively encourages residents to use their online facility to report fly-tipping incidents. The authority has its fair share of fly-tipping hotspots. Enforcement officers previously responded to complaints of fly-tipping, sought to obtain evidence from the waste and pursued a s33 EPA investigation into the fly-tipping itself and/or a s34(1)/34(2A) EPA into the origin of the waste. However, since August 2017 dedicated Hit Teams have been trained to photograph, inspect and retrieve evidence from fly-tipped waste and to remove the waste in the same visit. The investigations into the waste are then conducted by officers in the back office. The change has led to a sharp increase in the number of formal investigations carried out and a corresponding increase in the number of cases sent for prosecution; since 1<sup>st</sup> January 2018 a total of 20 files recommending prosecution have been forwarded to legal services 15 of which are currently pending before the courts.

The Unit is currently in discussions for the supply of 3 deployable solar powered CCTV cameras for use at hot spots across the Borough.

In addition, as of July 2018 Rochdale Council has a total of 9 Public Realm Inspectors who deal with all environmental and highway enforcement issues including fly-tipping, accumulations of waste, statutory nuisances, highway obstruction issues, unauthorised traveller encampments, abandoned vehicles. The Inspectors also investigate reports of Anti-Social Behaviour. In addition, there are 3 Town Centre Enforcement Wardens who deal with low level environmental offences including littering and anti-social behaviour issues. The Wardens will shortly be enforcing the Rochdale Town Centre Public Space Protection Order 2018 which it is expected will come into force in the very near future.

In **Tameside**, a Fly Tipping Enforcement Unit has been set up to deal with incidents of fly-tipping and illegal dumping in the borough. The unit aims to do this by driving forward enforcement and the resulting prosecutions, educating the wider community of the real costs of fly-tipping and working closely with other departments in the council to prevent fly-tipping and ensure if it does take place that clean-up is quick and effective. The officers in the Unit also provide support to private landowners and will take enforcement action wherever possible. A Service Charter is in place which clearly sets out the authority processes in terms of response times and subsequent action when a complaint is received.

The team visited 276 fly tipping complaints throughout the area in January and February, and during the same period 113 fixed penalty notices were issued for littering offences.

Tameside also recently held a multi-agency day of action<sup>6</sup>. Working with Greater Manchester Police and the Environment Agency, separate teams went out across the borough targeting suspected vehicles to check driver documentation in relation to any waste loads being carried. In total 14 vehicles were stopped and four fixed penalty notices were issued to drivers, for either not having waste transfer notes or being licenced waste

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<sup>6</sup> <http://www.stalybridgecorrespondent.co.uk/2018/04/26/council-crackdown-on-fly-tipping/>

carriers. In addition, a fly-tipping cleansing team patrolled the borough and they were able to clear up seven waste sites across Tameside.

**Trafford** operate Rapid Response teams in each area, to clear fly-tipping from local authority land. Neighbourhood Wardens actively try to find evidence of people fly-tipping to take legal action against them and residents are encouraged to use online reporting of incidents. Trafford have also recently taken targeted action, to reduce the time it takes to respond to and clean-up fly-tipping incidents, with the One Trafford Partnership announcing a 6-month pilot launched in June 2018.

In **Bury** a small cross departmental group of Council Officers, called the Environmental Quality and Fly Tipping Task Group, have been working to improve the Council's response to increasing levels of fly tipping in the borough. The group have identified hotspots which are targeted by fly-tippers on a sporadic basis. From this work they have been able to identify sites that are targeted more regularly and where a range of interventions such as signage, enforcement, targeted community action and deployment of CCTV may assist with catching offenders and act as a deterrent. The group have been allocated a one-off budget of £100k<sup>7</sup>, used as follows: Common Management Information System - £5,000; Targeted Neighbourhood Action - £30,000; CCTV Surveillance - £15,000; Replace Damaged and Missing Bins - £35,000; Replace Fly Tipping and Dog Fouling Signage - £5,000; Fly Tipping Clearance in Back Streets and Private Land Hot Spots - £10,000.

It was reported that during 2017 there had been 4 prosecutions and 2 simple cautions for fly tipping and duty of care offences and these had been publicised through social media and the press.

It was also reported that the Council had been working with residents and local businesses to encourage the upkeep of unadopted back streets. In addition, prevention work has been undertaken, such as barriers, at some sites to prevent vehicular access and the areas which were considered hotspots being evaluated for signage and CCTV coverage.

**Wigan** has a zero-tolerance approach to fly tipping and residents are proactively encouraged to report incidents and work with the council to identify hotspots. A new and expanded environmental education and enforcement team is in action seven days a week, targeting areas of the borough where fly tipping is a problem. Preventative measures such as installing barriers and CCTV have been in place, particularly in hotspots, and are considered to have had an effect; according to the authority figures for 2017/18 show a reduction in the number of incidents reported by 35% compared to 2016/17.

The introduction of fixed penalty notices for fly-tipping have also been considered to have been a successful approach, with numerous fines handed out to those caught fly-tipping.

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<sup>7</sup> <https://councildecisions.bury.gov.uk/mgAi.aspx?ID=6308>

For Bolton and Salford, who are actively addressing fly-tipping in ways that reflect their level of resourcing, case studies have been developed to provide more detailed information on the approaches taken and the subsequent outcomes.

## 3.2 Local Authority Case Studies

### 3.2.1 Bolton: Addressing Fly-tipping from the Front Line

In 2016/17 Bolton collected 962.06 tonnes of fly-tipped waste from just over 2,000 reported incidents, excluding an additional 105 reports of fly-tipping incidents on private land. The cost of clearance was £146,889 and 1,797 enforcement actions have been taken at a cost of £59,323. Whilst a spend of just over £200,000 is not something that any authority wants to be making in clearing up the mess left by others, Bolton is seeing real progress in the war against fly-tipping; compared to previous years there has been a significant reduction in the number of incidents they have had to deal with<sup>8</sup>. One of the reasons for this change has been the adoption of a zero-tolerance approach to fly-tipping through concerted education and enforcement actions. This has had a direct impact on the total number of fly-tipping incidents which have been steadily reducing, and clearly the authority has benefited from reduced costs normally associated with investigation, clean-up, and disposal.

The predominant challenge in Bolton has been fly-tipping in back alleys and addressing the long-held belief by residents that the council will automatically come and clean up any litter or rubbish dumped there has been a priority for action. This has involved a significant re-education and behaviour change programme, building on previous initiatives over the last 10 years such as the Love Bolton Hate Litter campaign, with hard hitting image based promotional material focusing on the 'Your Waste Your Responsibility' message. In addition, a 2-year funded trial paid for through a one-off revenue funded stream of £1.3m has seen the development and deployment of new behaviour change teams into front line services. Recruited from existing council employees, five teams of three officers have been put in place to work across Bolton and proactively target fly-tipping. Each team has a Lead Enforcement Officer whilst the other two members focused on education, awareness raising and clean-up. The trial operated across Bolton from 2015/16 to 2017/18 with the Behaviour Change teams enforcing policy and issuing Litter Fixed Penalty Notices (FPN) for smaller items dumped in back alleys and more serious fly-tipping incidents being dealt with either through a £400 FPN or full prosecution. A high proportion of FPNs issued are paid; in 2016/17 66% of FPNs were paid, which is significant when compared to other Greater Manchester authorities who are using this approach to deal with fly-tipping<sup>9</sup>. The authority will relentlessly pursue payment of FPNs and will not write any off that have not been paid; they are public about this and consider it to be one of the reasons why a higher proportion

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<sup>8</sup> 4,903 reported incidents in 2014/15 compared to 2,065 reported incidents in 2016/17

<sup>9</sup> (WasteDataFlow & <https://www.gov.uk/government/statistical-data-sets/env24-fly-tipping-incidents-and-actions-taken-in-england> )

are paid. During the trial the Behaviour Change Teams issued around 800 fixed penalty fines for fly-tipping offences.

The work of the Behaviour Change teams in talking to residents, educating and informing and the well-publicised successful prosecutions against individuals convicted of fly-tipping offences is seen to be serving as a deterrent to occasional and opportunistic fly-tippers and demonstrating that the zero-tolerance approach by the authority is being adhered to. This approach has seen a dramatic transformation in the condition of Bolton's back streets and alleyways.

Now the trial has come to an end the decision has been made to retain the Behaviour Change Teams and incorporate them into frontline services as standard. The costs associated with this are the redirection of resources from fly tip removal to enforcement and are expected to be more than offset by a reduction in costs associated with fly-tipping and lead to high levels of public satisfaction through cleaner neighbourhoods. Building on this approach the decision has also been made in recent weeks to train the four recycling officers to be able to issue Section 46 notices where residents are found to be presenting side waste or deliberately hiding waste in recycling bins.

For Bolton, this front-line approach to target fly-tippers head on, has started to make a difference. The innovative approach of combining operations and enforcement activities has been a major success, both in a reduction of fly-tip tonnage and a sustainable move in changing people's behaviours towards their local environment.

### 3.2.2 Salford: Cross Departmental Partnerships delivering Prosecution Successes

Salford has many similar challenges to Bolton, specifically back alley fly-tipping, however the focus of this case study is their response to the significant number of incidents of fly-tipping on highways and council land. In Salford the waste teams are responsible for addressing the problem of household and commercial waste presented inappropriately, specifically the presentation of side waste, whilst Salford City Council's lead Environmental Crime Investigations Officer, is focused on finding evidence to tackle opportune and organised waste crime resulting in localised fly-tipping in and around the Salford area.

In 2016/17 Salford collected 1,401 tonnes of fly-tipped waste from just under 3,000 reported incidents. The cost of clearance was £169,615 and 106 enforcement actions have been taken at a cost of £6,050. Again, whilst a spend of just over £175,000 is not something that any authority wants to be making in clearing up the mess left by others, Salford is also seeing real progress in the war against fly-tipping; as with Bolton compared to previous years there has been a significant reduction in the number of incidents they have had to deal with<sup>10</sup>. With limited resources but a strong council led desire to crackdown on fly-tipping, Operation Pandora, which was launched in March 2014, is one of the reasons for this change. The purpose of the campaign is to provide a coordinated response to addressing fly-tipping in Salford and raise the profile of prosecutions as a deterrent. The

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<sup>10</sup> 3,626 reported incidents in 2014/15 compared to 2,984 reported incidents in 2016/17

campaign is well supported by local media and by the council, with plenty of 'air time' being given to the outcomes of prosecutions.

Central to Operation Pandora is the relationship between the Environmental Crimes Investigations Officer and Salford's Central CCTV team. Previously when reports of fly-tipped waste were received, it was a painstaking process to secure evidence from the waste itself and any supporting witness statements to identify those responsible. In addition, evidence of this nature was not guaranteed to secure a prosecution. However, with the use of video footage of those undertaking the fly-tipping, that evidence is hard to contest. There are up to 140 CCTV cameras located across Salford, plus 10 mobile cameras which can be used for targeting hotspots in and around Salford. These cameras are monitored 24/7 by a team of operators, and the working relationship that has been built up by the Environmental Crime Investigations Officer with the monitoring staff has certainly contributed to an increase in the number of successful prosecutions. Sharing intelligence about known and potential hotspots has meant that more focused monitoring can take place and evidence more readily accrued. For the lead Environmental Crime Investigations Officer, feedback to the CCTV monitoring team is crucial, "it's very much a team effort and sharing in the successes in terms of prosecutions based on evidence they have generated helps support that sense of teamwork and reinforces their value to my work".

The mobile cameras have been a useful asset, and whilst they cannot be used exclusively for environmental and waste crime, in many cases there is an overlap with the anti-social behaviour teams and a joint request can be made. Costs for locating the mobile cameras includes a one-off fee of £400 plus a monitoring fee £120 a month; however, the business case can usually be made based on avoidance of clean-up costs.

To date Operation Pandora has not lost a case and has resulted in a total of 62 successful fly-tipping prosecutions of 53 individuals. Fines, costs and victim surcharges total £55,759.99 to date and in terms of individual fines a large proportion are in the £1k to £2k range<sup>11</sup>. Local and national news coverage of the work and outcomes of Operation Pandora has ensured that the message is constantly out there that if you fly-tip in and around the Salford area, every effort will be made to generate the evidence and there will be a prosecution.

### 3.3 Summary

All the local authorities recognise the challenge of fly-tipping, not only in terms of the impact on the public purse but also on their residents. It is widely recognised that fly-tipping has a negative impact on property values and a negative impact on mental health and can lead to increased antisocial behaviour. The 'broken windows' theory has long since been applied to fly-tipping and as most incidents across Greater Manchester are in back alleys or

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<sup>11</sup> 45% of fines and costs are £1k - £2K, 32% of fines and costs are £500 - £1k, 17% of fines and costs are £200 - £500 and 6% of fines and costs are over £2k.

highways the impact on residents is direct. The related social disamenity cost can be considerable but it is difficult to quantify this with any level of certainty.

From the review of local authorities, it is evident that they are responding to this challenge, however the difficulty appears to be getting the problem under control to any sort of manageable level, utilising the level of resources available.

## 4. How hard is it for the public to ‘do the right thing’ and how easy is it for operators to confuse the public on their Duty of Care – the Dave and Maxine story

An important part of the narrative of understanding the nature of waste crime in Greater Manchester was to test how waste clearance services responded to our attempt to investigate their operations and their legal compliance. We considered this to be an important element of the story, given that increasingly, local and national prevention campaigns have focused on the role of the householder, specifically in terms of their Duty of Care to ensure that there is a valid Waste Carrier Licence in place and a Waste Transfer Notice has been supplied.

The aim is get residents to think twice about using ‘the man with a van’, who may be acting outside of the system and who cannot demonstrate a clear audit trail of where the waste has been disposed of. Many of these campaigns have achieved a high level of publicity in recent months and some have been making inroads into addressing the problem in their local areas. However, how easy is it for a member of the public to comply with their Duty of Care and make sure whoever picks up their rubbish is legitimate and will not leave them exposed to prosecution?

### The Scenario:

Meet Dave and Maxine Platt. They are an average couple who have recently moved to a new house in Greater Manchester. The previous residents have left behind an old bed, mattress and a small tatty chest of drawers. Mr and Mrs Platt want this getting rid of as soon as possible, they are busy and quite stressed about moving to a new house, but Max has told Dave in no uncertain terms that she doesn’t want some dodgy bloke in a van coming around it has to be done properly by someone with a licence. As they haven’t got their internet up and running yet they use their local paper to find someone to do the job for them.

Using local newspapers<sup>12</sup> classified advertisements we have undertaken a snapshot assessment of several small traders, builders, skip hire and house clearance operators, who are potentially likely to be primary sources of the recorded fly-tipping incidents. We constructed a scenario using credible addresses and names and made credible but anonymised enquiries about their carriers’ licences and asked to see a photo of the licence before talking about the job – and recorded the responses we got.

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<sup>12</sup> Maxine and Dave research chose newspapers to test the theory that these ‘may’ be more reliable than online searches (the Facebook Fly-tipper phenomena is becoming more widely acknowledged as it is easier to pop up in various search engines and then disappear, leaving the householder more exposed). In theory a classified ad cannot simply disappear – even if the paper is thrown away, back copies can be secured so the trail is more permanent. Technically speaking these advertisings may be more likely to be legitimate.

We wanted to see how easy it was for a member of the public to meet at least part of their Duty of Care requirements and to ensure that a valid Waste Carrier Licence was in place.

We collected and looked through a mix of paid-for and free local papers<sup>13</sup> in the classified adverts for anyone offering to get rid of rubbish, unwanted household items, junk, furniture and so on:

Armed with a pay as you go SIM card and re-used mobile phone, we used our local knowledge to create plausible local addresses and locations to match the area the newspaper covered and using our scenario 'Dave and Maxine' phoned all the advertised services and asked the usual questions to establish if they could help, how much it would cost etc and then we asked for proof that they had the correct licences required.

We identified 34 different advertisements for waste clearance type services across the local newspapers; most adverts appeared in multiple papers. Of those, three adverts clearly included a Waste Carrier License number, which when verified through the Environment Agency (EA) public register married up to the advertised details. A further six advertised the old style of licence number, which when checked through the register could not be verified. Therefore, this left us with 31 different advertisements to follow up, to see how easy it was to verify whether they were a legitimate operator or not.

The response was varied, and a confusing picture started to emerge in terms of how confident a member of the public could be about the legitimacy of some of the operations.

The responses could be grouped as follows:

### **1. Proof of legitimate licence**

Only one response provided a licence number, which when verified on the EA database completely matched the advertised details.

### **2. Mismatch between registered licence details and advert**

In several cases we called the mobile or landline from the advert, proof of licence was given via text, but that licence when verified on the EA database was registered under a different company name to that which was being advertised. In addition, in many cases when the phone was answered the company name given matched neither the advertisement, nor the registered licence holder. This is confusing at best and misleading at worst and raises questions over how confident a householder would be of the legitimacy of the services.

### **3. 'Shared' licence, different advertisements**

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<sup>13</sup> This included: Bolton News; Leigh Journal; Wigan Post; Wigan Observer; Stockport Express; Tameside Reporter; Oldham Reporter; Middleton Guardian; Manchester Evening News; Rochdale Observer; Bury Times; The Messenger (Trafford); and, Manchester Weekly News. We ensured coverage of the whole of Greater Manchester.



There were several cases of the same registered licence being provided as proof when we called multiple different numbers, advertising under different names (see photographs in Figure 8). For example, in one case, an organisation advertised the licence number in their advert and included the strapline 'Working in Association with the Environment Agency to Stop Fly-tipping'. This licence was verifiable on the EA database. However, two additional, different, organisations, on different phone numbers, provided a photo of this same licence when asked for proof that they were registered waste carriers. A further two organisations gave this same number as proof. Following verification on the EA public register the licence is registered to a sole trader. Given that we spoke to different individuals on different phone numbers, operating under different company names, the chances of there being a legitimate explanation for this are limited.

This was not a unique case. A single licence number was provided by a further five organisations, again all operating under different names in different advertisements, and again the licence being registered to a sole trader.

Figure 8: Different Companies Same Licence



#### 4. Licences 'validated' by newspapers

One advert specifically stated that the newspaper had confirmed their status as a Registered Waste Carrier (see image 2), whilst another caller avoided the request to prove their status by aggressively stating that "I don't need to let you see it, the paper wouldn't let me say I had a licence if I didn't, they check it". Our assumptions that this was not the case and anyone could pretty much post anything in the classified advertisements were quickly validated following a call to the newspaper in question. However, both claims on the surface were delivered in a reasonably convincing manner.

Figure 9: Newspaper validation



#### 5. Out of date licences

Six of the adverts provided out of date licence numbers and could not be verified using the EA database. A quick spot check with the Environment Agency over the phone confirmed that they were no longer valid. More up to date licences could not be provided. However, on the face of it they appeared to be legitimate operators.

#### 6. Refusal to provide a licence

Responses to three of our calls were that proof would be given on collection and 'a written receipt is enough' and that once it's collected it 'became their responsibility not ours' and so there was 'nothing to worry about'. Out of the three calls one was rather vaguer and would potentially set off alarm bells, but two of the calls were much more forceful and more convincing.

#### 7. Admission of a lack of licence

Two of the adverts we responded to were open about their lack of Waste Carrier Licence. They were clearly operating on an informal capacity and one respondent, although charging the quoted going rate to take away our items, when pressed admitted to taking waste collected in his trailer to the 'local tip' and passing it off as his own household waste. Another stated that he had 'a mate in the business who let him use his skips'.

In summary the following responses can be seen Table 3.

Table 3: Summary of Responses Received

Outcome	Number of Adverts
Valid licence included in advert	3
Valid licence provided on request	1
Mismatch between licence details and advert	4
'Shared' licence, different advertised details	8
Out of date licence details provided	6
Claim of validation by newspaper	2
Refusal to provide proof of licence	3
Admission of no licence	2
Phone diverted to other number/no connection	5

These findings demonstrate the challenges faced by one of our first lines of defence in the fight against fly-tipping, namely the householder. The evidence collected through this scenario may not come as a surprise to many waste professionals, but it graphically highlights the confusion and misinformation that surrounds this area and which the public are faced with daily. Whilst many campaigns focus on the need for residents to check the validity of waste operators as the initial line of prevention of fly-tipping, it's not always straightforward for members of the public to comply. Adverts, whether in newspapers or social media, focus more on the price and convenience and the onus is largely on the householder to check for information; however, clarity as to householders' responsibilities are not apparent at the point of service advertising.

Campaigns such as Right Waste, Right Place have not so far been aimed directly at the householder, and whilst other high-profile initiatives such as Keep Britain Tidy #CrimeNotToCare and Hertfordshire's 'Lets Scrap Fly-tipping' have started to make inroads on this area it is clear that much work is still to be done to clarify to the 'Mr and Mrs Platts' of the world exactly what is expected of them and to support and help them make the right decision. Wilful misinformation from operatives about the legitimacy of their operations appears to be rife and this therefore makes it very difficult for the householder to ascertain legitimacy. Newspapers do not validate the legitimacy of advertisers, as some operatives indicated, and more could be done by the publishers to make their readers aware of this. At the same time, newspaper publishers and websites could be encouraged to run adverts promoting Duty of Care from time to time (when there is unsold space available) as a public service contribution, like the ones they run to promote recycling.

For residents like Dave and Maxine the simple answer would be to keep trying until they find an operator who has a licence that matches their advertised details; but we can say that as waste professionals 'in the know'. For those residents who do not log onto council

websites promoting the latest initiatives, do not follow campaigns on Twitter or Facebook, at which hurdle would they fall? Would they find being given assurances that the paper or the website have endorsed their licence to be 'enough' proof of legitimacy? Do residents even know what a licence or waste transfer note should look like?

'Dave and Maxine' tried to do the right thing and found it very difficult to get correct assurances from most operatives called. A concerted and sustained effort will be needed to raise public consciousness of their routine legal duties in relation to waste clearance, if this is ever to reach the levels of understanding of routine legal duties achieved in other areas of public policy, such as seat-belt wearing or alcohol consumption.

Having shown the ease with which confusion can be generated for householders by rogue operators, the next stage of our research took this basic proposition to a deeper level and sought to test public opinion in Greater Manchester in a rigorous and comprehensive manner, using established and reputable opinion pollsters and researchers.

## 5. Public Understanding – the YouGov research

As part of the research a comprehensive assessment of public awareness of and attitudes towards their legal responsibilities when moving waste was undertaken online by YouGov<sup>14</sup>

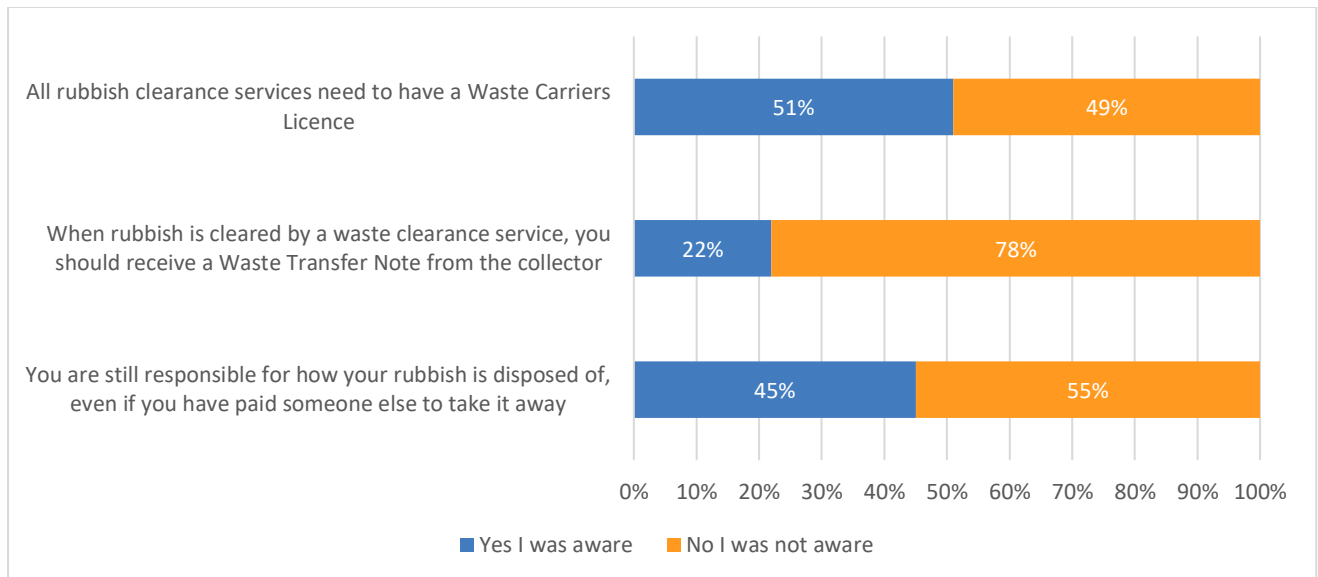
In determining the importance of low pricing, convenient service and good availability in choosing a waste clearance service, perhaps unsurprisingly Greater Manchester adults placed high importance on all three elements, with 90% saying low price was very or fairly important, 90% also saying that convenience was very or fairly important and 92% saying that good availability was very or fairly important.

Asked if holding a Waste Carrier Licence was an important factor in their choice, 54% of Greater Manchester adults said it was very important with 27% saying it was fairly important and only 11% saying it was not at all or not very important. The survey shows that awareness of the existence of licences is higher than might have been thought but given the experience of Dave and Maxine it's not clear that awareness of the existence of licences would mean the ability to easily confirm that any operator had a valid licence. Following on from this, whilst having a licence was a relatively important factor in their choice of service, only 51% of Greater Manchester adults indicated awareness that clearance services needed to have a Waste Carriers Licence. Some interesting demographic differences emerged here, with only 35% of 18-34-year olds indicating awareness of the need for a Licence, compared to 67% of those aged 55 and over. Awareness of the need for a Licence was also notably higher in Wigan (67%). Awareness of the requirement that a Waste Transfer Note should be issued is much lower with 22% of Greater Manchester adults indicating they were aware of this requirement (Figure 10).

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<sup>14</sup> Total sample size was 501 adults. Fieldwork was undertaken between 21<sup>st</sup> and 28<sup>th</sup> June 2018. The survey was carried out online. The figures have been weighted and are representative of all Greater Manchester adults (aged 18+). Refer to Appendix 3 for the questions and associated graphs.

Figure 10: Awareness of requirements and responsibilities



When asked about responsibility, 55% of Greater Manchester adults said they were unaware that they were still responsible for how rubbish is disposed of, once they had paid for someone to take it away. Asked also about who they thought could be fined for fly-tipping, over a third (37%) thought it was the clearance service and just over two in five (44%) thought both themselves and the service, with 10% saying they thought it was themselves.

Finally, asked where they might get their information on what service to use, more than 50% suggested the local council/ local authority (57%), search engines (57%) or word of mouth (52%) as the sources, with 23% suggesting social media and 18% local newspapers or free classified magazines.

A more detailed demographic and geographic breakdown is available, which also includes data broken down by council area, but this data needs to be treated with caution as, at that level the sample sizes are smaller and not statistically significant - it is the overall survey which carries statistical weight and provides the clear picture of what is a confused understanding about levels and allocation of responsibility for dealing with waste properly, with low pricing and convenience dominating over concern for legal compliance, even with reasonably high levels of awareness of the existence of Waste Carriers Licences. It is no wonder that the 'man with a van' showing no evidence of legal compliance with waste laws continues to flourish in Greater Manchester.

## 6. What more can be done - opportunities to intervene

In many respects, the story we have compiled for Greater Manchester is not at all dissimilar to that in other parts of the country. Although there are high volumes of incidents, the basic situation is similar – it is a story of fairly opportunistic localised fly-tipping, involving relatively low-level but persistent criminal activity on our own doorsteps (and in our own back alleys), in which the public have low awareness of their legal duties and an overriding desire for low price and convenience from clearance services, as evidenced through the YouGov research and the Dave and Maxine story and recorded in volume by the weight of the data for Greater Manchester. It is also worth stating that in some cases if the public are paying for a collection service, they may simply have an implicit expectation that the waste will be disposed of correctly.

In Greater Manchester, the criminal activity in relation to fly-tipping can be described as three main layers of activity:

- fairly lazy local dumping by one's neighbours;
- illegal operation by local 'man and a van'; and
- illegal operation by regional operators (men in vans) working under 'shared' or non-existent Waste Carriers Licences with no scrutiny.

Therefore, in trying to get the problem of fly-tipping under control, where there is apathy, disinterest or lack of awareness and understanding by residents and there is a multimillion pound opportunity for the 'man and van' to be exploited, there are many challenges. Multi agency approaches to target offenders are being utilised in some areas and communication campaigns targeting residents are being used in others, however the challenges are significant in terms of generating a sustained behaviour change.

One obvious consideration would be the role of the local authority in terms of the services offered for waste material that fall outside of the standard collection services. The context of this would be to effectively cut out the demand for the 'man with van' operator.

However, there are several issues with this.

Firstly, local authorities have traditionally offered a bulky waste collection service and whilst charges do apply for this the rates are generally competitive (refer to Appendix 4 for further details). For example, had our fictional characters of Maxine and Dave opted to use their local council bulky collection services for the three items in the scenario, in most of cases it would have been cheaper than the 'going rate' quoted by the 'man and van' operator. This sits at odds slightly with our survey results where when asked what was important to them in selecting a service, price featured highly. However, it is likely that the other important factors identified, namely convenience and customer service matter more than price. All the operators we phoned were prepared to collect at some point the same day or at the latest the next day, and all were prepared to come into the property and remove the items. Local authority bulky collection services are generally not set up to be able to respond so quickly and, unless reuse is the preferred outcome, collection will be from outside the property.

Secondly it would be difficult for local authorities to operate a collection service that truly reflected the full costs of collection and disposal and at the same time remain competitive. The range in prices quoted shows significant variance and is not representative of the full costs of the service (i.e. employee costs, vehicle, fuel, insurance, and disposal charges).

Looking in more detail at the charges made by 'man and van', the consistent rate for three items (bed, mattress and chest of drawers) was £50. Assuming this is equivalent to a small van load, the local authority clean up charges for each incident (i.e. our three items) is estimated be £56 (national average used in the Defra annual returns). Already authorities are offering a much lower price than this for the equivalent bulky service, however it's failing to draw householders from using the quick and convenient 'man with van' operator.

Therefore, much needs to be done in educating, informing and motivating residents to take their responsibilities seriously and 'do the right thing'.

Given the ever-growing political interest in tackling waste crime following a concerted effort by many in our industry to raise the profile of this serious issue, this research provides additional insight into public opinion and should assist the future development of waste responsibility awareness campaigns. More can be done to localise and intensify communications campaigns on waste responsibilities at household level, building on previous campaign activity.

As noted earlier, Government activity is accelerating, with the recent high-profile Call for Evidence on Serious and Organised Crime in the Waste Sector. Whilst the review makes clear it does not focus on fly-tipping and smaller waste crime incidents, apart from in connection with the review's understanding of organised criminality, our contention is that the very mixed and often low levels of public understanding of their responsibilities (as evidenced in the YouGov survey and supported by surveys taken out in other areas such as the Keep Britain Tidy work on behalf of the Hertfordshire Waste Partnership) for basic household waste clearance encourages the atmosphere of indifference in which can breed low level crime and of course potentially develop into larger scale illegal activity. This combined with recent reports<sup>15</sup> from the Environment Agency that over one-third of all illegally dumped waste is from households, emphasise the importance of tackling individual household responsibility for waste clearance as part of combatting waste crime. We hope that the review will consider this as part of its deliberations.

In addition, consultation is still open on Defra and the Welsh Government's updated guidance on the household waste Duty of Care and new guidance for English local authorities on issuing Fixed Penalty Notices (FPNs) and this has the effect of complementing the Serious and Organised Waste Crime Review by focusing on the low-level activity that remains a continuing blight and cost burden for local authorities. What constitutes a 'proportionate use' of FPNs remains a debating point, but the YouGov survey evidence

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<sup>15</sup> Environment Agency (2018) Households urged to play their part in tackling waste crime, News Release 3<sup>rd</sup> July 2018 <https://www.gov.uk/government/news/households-urged-to-play-their-part-in-tackling-waste-crime>



indicating low awareness of the need for a Waste Transfer Note leaves much of the public potentially exposed to enforcement. If this is accompanied, or better preceded, by a consistent and effective communications effort on duties and responsibilities – aimed at the householder – then a more intensive enforcement approach would be likely to command public support.

Reconciling the mismatch between the stated importance to the public of low-cost and convenience in waste clearance services, dismay about persistent fly-tipping and confusion about how to discharge their legal duties as citizens, remains an ongoing challenge and the good work that has been carried out in this area needs to be built upon as a matter of urgency.

The Keep Britain Tidy Action Plan for Fly-Tipping<sup>16</sup> provides a good foundation for a renewed approach, and we see no reason not to republish it here – it works as a basis for action.

Figure 11: Action Plan, from *Reaching the Tipping Point: Keep Britain Tidy's action plan for fly-tipping*



Critical to the success of such an Action Plan in Greater Manchester would be the localisation<sup>17</sup> of any communications campaigns that are redesigned for the next wave of enforcement and awareness efforts.

<sup>16</sup> Keep Britain Tidy (2018) *Reaching the Tipping Point*, at <http://www.keepbritaintidy.org/sites/default/files/resource/KBT%20Fly-tipping%20Action%20Plan%20four-page%20plan.pdf>

<sup>17</sup> Substantial evidence from campaigns such as Recycle Now have shown the importance of local messages combined with national campaign. For waste crime there needs to be a reinforcing of messages to ensure they reach residents at the point at which they are committing to a collection operator.

## 7. Key Recommendations

Tackling fly-tipping across Greater Manchester requires all those with an interest to collaborate and build further on the substantial efforts already being made to deal with the problem. We have offered some broad recommendations for further consideration.

- a) Highlight the cost of fly-tipping clearance in any new communications campaigns, as this is money that could be better spent on other local authority services. This approach of using hard hitting financial facts does seem to resonate and find traction with residents who may be less receptive to environmental campaigns.
- b) Seek to recover more of the costs of clearance through fines and enforcement activities, which presently contribute only modestly towards the total costs. This will require a greater investment in enforcement activities, however its possible for a sound business case to be developed based on future cost avoidance.
- c) Devise new communications to localise messages about the importance of staying within the law and being aware of Carriers' Licences and Waste Transfer Notes. This could include targeted social and print media advertising, alongside the waste clearance adverts so that they have prominence in juxtaposition to the classified advertisements and social media pages.
- d) Focus general communications activity on the need for local action, and highlight distinctive local issues such as back alleys, utilising the existing good practice work of agencies such as Keep Britain Tidy and well developed local campaigns such as Hertfordshire Waste Partnership's Fly-Tipping Campaign<sup>18</sup>.
- e) Engage the Environment Agency (EA) by consistently supporting them with intelligence on illegal operators, including reporting advertisers erroneously using the EA logo to gain credibility for their service.
- f) Simplify how householders and businesses can access quality assured information about legal, compliant collectors and waste managers. This could involve some form of validation service for collectors and operators, involving a new collaboration between the GMCA, the ten local district authorities of Greater Manchester, the Environment Agency, representative trade bodies such as the ESA and the Chartered Institution of Wastes Management, utilising the expertise of service providers such as Dposal.
- g) Further research should be commissioned which investigates the true level of knowledge and understanding amongst businesses about their duty of care and explores their main drivers in terms of selecting disposal services. This will provide evidence to judge whether there is any parity between the householder view and local businesses and help provide focus for any subsequent targeted campaign work.

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<sup>18</sup> The Hertfordshire Fly Tipping Campaign Toolkit has been designed so it can be used by any local authority or local authority Partnership both in isolation and with other agencies such as the Police, Police & Crime Commissioners, Fire & Rescue Services, Keep Britain Tidy, the Environment Agency and the National Farmers Union. It is an off-the shelf free to use resource.

## 8. Conclusion and acknowledgements

We recognise that local authorities in Greater Manchester face huge challenges in tackling the extent and depth of fly-tipping in the area and need support from the Environment Agency, Police and the community in making even more effort to tackle this real scourge that is such a drain on real-time resources, with real cost burdens and significant opportunity cost attached to it. The authorities of Greater Manchester are to be commended for the efforts they are making in challenging circumstances. More headway could be made if more resources were deployed to enforcement, communications and policing, and it is hoped that the negative impact of the costs associated with waste crime in Greater Manchester provide a spur to further action.

We are grateful to Sophie Walker and Tom Passmore of Dsposal for their support throughout this project, Simon Geggie of Salford City Council and Laura Swann and Andrew Bolan from Bolton Council for their participation in case studies, the GM Business Growth Hub's Green Growth team for their financial and practical support, Jane Rowe and Gelisa Devin from YouGov and last but not least, Dave and Maxine.

## Appendix 1: Greater Manchester local authorities' fly-tipping data summaries

Source: Defra (<https://www.gov.uk/government/statistical-data-sets/env24-fly-tipping-incidents-and-actions-taken-in-england>) and WasteDataFlow

Summary Table

	Year	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan
Fly-tipping tonnage	2016/17	962.06			Website data - 1500	685	1,401			Website data - 350	
Total no. of fly-tipping incidents	2016/17	2,065	3,337	28,508	1,221	5,112	2,984	2,040	2,783	2,649	2,105
	2015/16	2,964	3,853	22,251	849	4,328	3,286	1,945	2,742	1,487	2,400
	2014/15	4,903	3,061	18,907	1,214	4,394	3,626	1,806	2,775	1,724	2,582
	2013/14	4,368	2,000	21,449	775	4,082	3,836	1,909	1,016	1,360	2,479
Clearance Costs	2016/17	£146,889	£217,476	£2,812,890	£81,850	£220,052	£169,615	£162,359	£93,032	£142,370	£106,374
	2015/16	£272,268	£169,902	£2,149,099	£58,733	£138,791	£183,775	£112,215	£111,788	£71,591	£125,672
	2014/15	£213,929	£135,680	£1,613,358	£76,739	£201,967	£212,315	£95,474	£111,544	£92,680	£126,352
	2013/14	£281,873	£98,125	£1,561,520	£47,623	£201,648	£227,828	£110,761	£30,901	£79,472	£102,640
Total number of enforcement actions	2016/17	1,797	318	3341	2104	5980	106	2115	2156	3254	401
	2015/16	1,461	869	1361	7560	4859	112	2023	3819	1907	691
	2014/15	1,389	638	1478	11633	4374	134	1887	2449	3484	884
Total cost of enforcement actions	2016/17	£59,323	£10,494	£125,898	£69,901	£196,878	£6,050	£69,729	£71,082	£107,382	£13,700
	2015/16	£53,697	?	£60,251	£250,184	£162,783	£4,298	£66,852	£126,796	£62,931	£22,803
	2014/15	£48,074	£21,054	£52,209	£386,031	£143,751	£9,072	£64,206	£80,817	£114,972	£29,172
Clearance costs + cost of enforcement actions (16/17)		£206,212	£227,970	£2,938,788	£151,751	£416,930	£175,665	£232,088	£164,114	£249,752	£120,074
FPNs issued (& paid) (16/17)		189 (125)	1 (0)	1416 (208)	163 (0)	7 (0)	0	0	6798 (65)	363 (6)	0
Fines (excl. FPNs) (16/17)		£9,995	£0	£34,259	£1,299	£2,060	£3,190	£215	£290	£0	£400

### Location of fly-tipping incidents (2016/17)

	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan
Highway	154	870	16,877	155	1,219	1,504	482	1,091	1,123	204
Back alleyways	897	1,973	6,945	673	1,338	905	337	518	1,014	978
Private residence	24	57	1	23	267	124	163	491	9	108
Other (unidentified)	47	22	1,020	64	121	12	1	18	52	0
Footpaths/ bridleways	217	364	90	112	210	232	204	289	182	148
Council land	709	16	3,375	131	1,765	154	702	253	262	483
Commercial /Industrial land	3	25	112	31	129	40	107	98	6	44
Agricultural land	4	6		21	5	3	19	3		17
Water courses/ banks	7	4	65	9	53	6	16	18		17
Railways	3		23	2	5	4	9	4	1	6

### Location of fly-tipping incidents (as a % of total incidents) 2016/17

	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan
Highway	7%	26%	59%	13%	24%	50%	24%	39%	42%	10%
Back alleyways	43%	59%	24%	55%	26%	30%	17%	19%	38%	49%
Private residence	1%	2%	0%	2%	5%	4%	8%	18%	0%	5%
Other (unidentified)	2%	1%	4%	5%	2%	0%	0%	1%	2%	0%
Footpaths/ bridleways	11%	11%	0%	9%	4%	8%	10%	10%	7%	7%
Council land	34%	0%	12%	11%	35%	5%	34%	9%	10%	24%
Commercial /Industrial land	0%	1%	0%	3%	3%	1%	5%	4%	0%	2%
Agricultural land	0%	0%	0%	2%	0%	0%	1%	0%	0%	1%
Water courses/ banks	0%	0%	0%	1%	1%	0%	1%	1%	0%	1%
Railways	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

### Fly-tipping incidents by size (2016/17)

	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan
Transit van load	451	1032	9261	214	448	161	185	248	360	240
Tipper lorry load	71	48	2052	60	119	33	153	3	5	0
Small van load	943	858	10398	429	1635	2224	706	631	1263	1096
Car boot	349	976	3902	375	2158	458	350	610	835	323
Single item	183	331	1178	105	418	99	582	235	169	275
Single black bag	34	67	901	28	324	4	0	103	13	8
Significant multi loads	34	9	816	10	10	5	58	0	4	0

### Clearance cost by size (2016/17)

	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan
Transit van load	£51,865	£118,680	£1,065,015	£24,610	£51,520	£18,515	£21,275	£28,520	£41,400	£27,600
Tipper lorry load	£15,750	£8,256	£718,200	£13,800	?	£7,875	£53,550	£1,050	£575	£0
Small van load	£52,808	£48,048	£582,288	£24,024	£91,560	£124,544	£39,536	£35,336	£70,728	£61,376
Car boot	£10,121	£28,304	£113,158	£10,875	£62,582	£13,282	£10,150	£17,690	£24,215	£9,367
Single item	£5,307	£9,599	£24,162	£3,045	£12,122	£2,871	£16,878	£9,715	£4,901	£7,975
Single black bag	£238	£469	£6,307	£196	£2,268	£28	£0	£721	£91	£56
Significant multi loads	£10,800	£4,120	£293,760	£4,600	?	£2,500	£20,970	£0	£460	£0
<b>Total Clearance Costs</b>	<b>£146,889</b>	<b>£217,476</b>	<b>£2,812,890</b>	<b>£81,850</b>	<b>£220,052</b>	<b>£169,615</b>	<b>£162,359</b>	<b>£93,032</b>	<b>£142,370</b>	<b>£106,374</b>

**Waste Type (by number of incidents) (2016/17)**

Waste Type	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan
Animal Carcass Incidents	6	5	11	0	21	3	2	1	1	1
Green Incidents	25	101	367	33	147	50	75	77	52	51
Vehicle Parts Incidents	6	10	82	16	75	11	17	9	11	6
White Goods Incidents	86	131	2130	38	200	173	242	219	188	92
Other Electrical Incidents	10	28	271	7	54	29	34	30	29	38
Tyres Incidents	12	81	83	5	105	23	36	48	16	25
Asbestos Incidents	19	43	66	5	10	47	29	20	14	19
Clinical Incidents	2	8	26	3	28	0	3	14	4	1
Constr / Demol / Excav Incidents	90	166	887	44	483	32	156	80	118	125
Black Bags - Commercial Incidents	12	129	303	6	154	3	21	114	0	16
Black Bags - Household Incidents	496	972	5750	236	1726	237	406	1213	674	225
Chemical Drums, Oil, Fuel Incidents	6	5	48	8	4	13	8	38	3	2
Other Household Waste Incidents	1039	1188	12190	694	1900	2244	882	812	1335	1452
Other Commercial Waste Incidents	55	67	925	29	29	87	82	72	69	52
Primary Waste Type Measures Other (unidentified) Incidents	201	403	5369	97	176	32	47	36	135	0



### Number of enforcement actions (2016/17)

Actions	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan
Investigation actions	1277	194	898	1221	5112	78	2040	1527	3051	397
Warning letter actions	47	6	32	0	546	22	0	365	0	0
Statutory notice actions	0	17	783	675	277	0	6	43	162	3
Duty of Care inspection actions	238	100	52	37	0	0	67	13	30	0
Prosecution Actions	41	0	160	7	14	6	2	2	0	1
FPNs	189	1	1416	163	7	0	0	206	11	0
Formal Caution	5	0	0	0	19	0	0	0	0	0
Vehicles seized	0	0	0	0	5	0	0	0	0	0
Stop and Search	0	0	0	0	0	0	0	0	0	0

### Outcomes of enforcement actions (2016/17)

Actions	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan
Absolute/conditional discharge	3	0	0	1	2	0	0	0	0	0
Community Service	1	0	0	0	0	0	0	0	0	0
Fines	37	0	160	6	10	6	2	2	0	1
Custodial sentence	0	0	0	0	0	0	0	0	0	0
FPNs paid	125 (66%)	0	208 (15%)	0	0	n/a	n/a	65 (1%)	6 (2%)	n/a
Other (successful outcome)	0	0	0	0	2	0	0	0	0	0
Cases lost	0	0	0	0	0	0	0	0	0	0

### Cost of enforcement actions (2016/17)

Actions	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan
Investigation actions	£42,141	£6,402	£29,634	£40,293	£168,696	£2,574	£67,320	£50,391	£100,683	£13,101
Warning letter actions	£1,551	£198	£1,056	£0	£18,018	£726	£0	£12,045	£0	£0
Statutory notice actions	£0	£561	£25,839	£22,308	£9,141	£0	£198	£1,419	£5,346	£99
Duty of Care inspection actions	£7,854	£3,300	£1,716	£1,221	£0	£0	£2,211	£429	£990	£0
Prosecution Actions	£1,375	£0	£20,925	£700	£0	£2,750	£0	£0	£0	£500
FPNs	£6,237	£33	£46,728	£5,379	£231	£0	£0	£6,798	£363	£0
Formal Caution	£165	£0	£0	£0	£627	£0	£0	£0	£0	£0
Vehicles seized	£0	£0	£0	£0	£165	£0	£0	£0	£0	£0
Stop and Search	£0	£0	£0	£0	£0	£0	£0	£0	£0	£0

### Number of fines awarded at different levels (excl. FPN) (2016/17)

Level of fine	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan
£0 to £50	1	0	11	0	0	1	0	0	0	0
£51 to £200	19	0	44	2	9	0	2	2	0	0
£201 to £500	14	0	104	4	0	3	0	0	0	1
£501 to £1000	2	0	1	0	1	1	0	0	0	0
£1001 to £5000	1	0	0	0	0	1	0	0	0	0
£5001 to £20,000	0	0	0	0	0	0	0	0	0	0
£20,001 to £50,000	0	0	0	0	0	0	0	0	0	0
£50,000 plus	0	0	0	0	0	0	0	0	0	0
<b>Total value of fines awarded</b>	<b>£9,995</b>	<b>£0</b>	<b>£34,259</b>	<b>£1,299</b>	<b>£2,060</b>	<b>£3,190</b>	<b>£215</b>	<b>£290</b>	<b>£0</b>	<b>£400</b>

## Appendix 2: Supporting data from Salford case study, detail of prosecutions

## Salford Prosecution Outcomes

Date of prosecution	Date of offence	Nature of offence	Profile of offender	Outcome			
				Fine	Costs	Victim Surcharge	Total
22/06/18	20/05/17	Domestic - illegally dumped/fly-tipped controlled waste: cardboard packaging, a baby rocker, children's clothing, a child's scooter, an electric fly catcher, a mattress, a broken outdoor table, a bed base, a child's car seat, a fridge, outdoor chairs, wood, metal and other controlled waste on land at Twelve Yards Road	MALE AGE 22 OF BB5	£320	£800	£32	<b>£1,152</b>
05/04/18	29/11/17	Domestic - illegally dumped/fly-tipped controlled waste: a fridge freezer and a washing machine on land at Cambridge Street,	MALE AGE 28 OF M7	£1,000	£427	£100	<b>£1,527</b>
05/04/18	29/11/17	Domestic - illegally dumped/fly-tipped controlled waste: a fridge freezer and a washing machine on land at Cambridge Street,	MALE AGE 21 OF M3	£1,000	£427	£100	<b>£1,527</b>
20/02/18	01/05/17	Domestic - illegally dumped/fly-tipped controlled waste: including bottles of pop, cartons of milk and yoghurt and jars of pickles on land at Bramley Street	MALE AGE 53 OF M9	£480	£600	£48	<b>£1,128</b>
07/12/17	16/01/17	Domestic - illegally dumped/fly-tipped controlled waste: a sofa, parts of a bed base and other controlled waste on land at Caroline Street,	MALE AGE 60 OF M27	£320	£400	£32	<b>£752</b>
21/11/17	22/01/17	Commercial - illegally dumped fly-tipped carpet off cuts, underlay, general building waste, plastic, glass and other controlled waste on land at Bramley Street	MALE AGE 64 OF WN2	£350	£423.65	£35	<b>£808.65</b>
09/11/17	15/04/17	Domestic - illegally dumped/fly-tipped a large cardboard box containing controlled waste, a set of step ladders, a venetian blind and other controlled waste on land at Eliza Ann Street,	MALE AGE 46 OF M30	12-month conditional discharge	£386	£20	<b>Total £406 (also, a 6-month driving ban)</b>

15/05/17	15/05/16	Domestic - illegally dumped/fly-tipped controlled waste on and at Cambridge Street	MALE AGE 23 OF BB3	£150	£250	£30	<b>£430</b>
02/05/17	04/08/16	Domestic - illegally dumped/fly-tipped controlled waste on land at Dickinson Street,	MALE AGE 50 OF M25	£320	£486	£32	<b>£838</b>
06/04/17	03/12/15	Domestic - illegally dumped/fly-tipped controlled waste deposited on land at Dickinson Street,	MALE AGE 45 OF SK4	£500	£580	£50	<b>£1,130</b>
05/04/17	31/07/16	Domestic - illegally dumped/fly-tipped three bin bags containing controlled waste and illegally dumped/fly-tipped six bin bags containing controlled waste on land at Dickinson Street	MALE AGE 42 OF M3	£320	£851	£30	<b>£1,201</b>
05/04/17	25/06/16	Commercial - illegally dumped/fly-tipped ten bin bags containing controlled waste, one cardboard box containing cardboard, cardboard and other controlled waste, on land at Dickinson Street	MALE AGE 25 OF SK5	£333	£1,053	£33	<b>£1,416</b>
04/11/16	25/10/16	Commercial - deposited five 18.9 Litres water bottles and one water cooler/dispenser on land at Bramley Street	MALE AGE 42 OF HX2				<b>Six offences referred to West Yorkshire Police.</b>
04/11/16	19/12/15	Domestic -illegally dumped/fly-tipped controlled waste on land at Dickinson Street	MALE AGE 42 OF M21	£1,250	£880	£125	<b>£2,225</b>
24/08/16	16/04/16	Domestic - illegally dumped/fly-tipped cardboard, a cooker, a cooker hood and other controlled waste on land at Thurlow Street	MALE AGE 39 OF BS10	£420	£1,039	£42	<b>£1,501</b>
27/07/16	16/03/16	Domestic - controlled waste to be deposited on land at Thurlow Street,	MALE AGE 53 OF M44	£40	£150	£20	<b>£210</b>
15/06/16	08/02/16	Domestic - illegally dumped/fly-tipped ten large bin bags containing controlled waste on land at Cottenham Lane	MALE AGE 22 OF M12	£400	£573	£40	<b>£1,013</b>
15/06/16	05/01/16	Domestic - illegally dumped/fly-tipped a soiled bed mattress (urine and faeces) wood and other controlled waste on land at Cottenham Lane	MALE AGE 56 OF M27	£400	£920.65	£40	<b>£1,360.65</b>

25/05/16	10/12/15	Domestic- illegally dumped/fly-tipped ten bin bags containing controlled waste on land at Dickinson Street	MALE AGE 51 OF M8	£700	£797	£70	<b>£1,567</b>	
06/01/16	25/08/15	Domestic -illegally dumped/fly-tipped approximately two hundred and fifty tonnes or more of contaminated soil on land at Hill Top Road	MALE AGE 43 OF M28	£800	£1,070	£120	<b>£1,990</b>	
23/10/15	22/09/14	Domestic -illegally dumped/fly-tipped three large black bin bags containing controlled waste, three large blue bin bags containing controlled waste and illegally dumped/fly-tipped two large blue bin bags containing controlled waste and one large black bin bag containing controlled waste on land at Cottenham Lane,	FEMALE AGE 32 OF M15	£140	£772.58	£20	<b>£932.58</b>	
14/09/15	27/02/15	Commercial -illegally dumped/fly-tipped general plumbing waste on land at Fiddlers Lane,	MALE AGE 27 OF M44	£800	£780.43	£80	<b>£1,660.43</b>	
26/08/15	02/01/15	Domestic -illegally dumped/fly-tipped cardboard and packaging on land at Elton Street	MALE AGE 51 OF M7	£1,532	£804	£120	<b>£2,546</b>	
19/08/15	27/09/14	Domestic -illegally dumped/fly-tipped seven large buckets containing broken wall tiles and general building waste on land at Thurlow Street	MALE AGE 42 OF M6	£580	£848.04	£58	<b>£1,486.04</b>	
19/08/15	18/04/15 & 26/04/15	Commercial -being a person subject to a duty of care in respect of controlled waste under S34(1) of the Environmental Protection Act 1990, as a carrier of controlled waste did fail to take all such measures applicable to him in that capacity as were reasonable in the circumstances on the transfer of the waste to secure that the transfer was only to an authorised person	MALE AGE 27 OF M30		Sentenced to a 2-year Conditional Discharge	£1,104.68	£15	<b>£1,299.68</b>
14/08/15	15/01/15	Domestic -illegally dumped/fly-tipped cardboard, metal, plastic, polystyrene, wood and general waste on land at Elton Street	MALE AGE 21 OF M8	£500	£876.64	£50	<b>£1,426.64</b>	
24/06/15	06/02/15	Domestic - illegally dumped/fly-tipped broken pallets and wood on land at Elton Street	MALE AGE 55 OF M7	£300	£200	£30	<b>£530</b>	

27/05/15	27/09/14	Commercial - illegally dumped/fly-tipped a large amount of tree cuttings and general garden waste on land at Thurlow Street	MALE AGE 45 OF BB5	£73	£500	£20	<b>£593</b>
06/05/15	11/08/14	Domestic - illegally dumped/fly-tipped two large cardboard boxes and ripped bin bags on land at Cottenham Lane	MALE AGE 24 OF BN23	£35	£795	£20	<b>£850</b>
08/04/15	06/08/14	Commercial - illegally dumped/fly-tipped a large amount of commercial and trade waste including cardboard, packaging and personal data on land at Elton Street	MALE AGE 47 OF M7	£250	£1,165		<b>£1,415</b>
25/02/15	12/10/14	Domestic - illegally dumped/fly-tipped two large cardboard boxes, polythene packaging and one plastic bottle on land at Cottenham Lane	FEMALE AGE 25 OF WF10	18 Month Conditional Discharge	£300	£15	<b>£315</b>
25/02/15	11/08/14	Domestic - threw down, dropped or otherwise deposited five wet wipes (soiled with human excrement) on land at Cottenham Lane	MALE AGE 66 OF BL1	£100	£481.40	£20	<b>£601.40</b>
25/02/15	11/08/14	Domestic - threw down, dropped or otherwise deposited one pair of grey men's boxer shorts (soiled with human excrement) and seven wet wipes (soiled with human excrement) on land at Cottenham Lane	FEMALE AGE 59 OF BL1	£100	£481.40	£20	<b>£601.40</b>
07/01/15	2/05/14	Domestic - illegally dumped/fly-tipped four black bin bags containing general household waste, three black bin bags containing wall paper, one white bin bag containing general household waste, one black carpet rug and one pink 'Dreaming in Progress' pet bed on land at Charles Street	MALE AGE 23 OF M27	£400	£650	£40	<b>£1,090</b>
17/12/14	26/07/14	Domestic - illegally dumped/fly-tipped six bin bags containing general garden waste and hedge cuttings on land at Thurlow Street, Salford	FEMALE AGE 37 OF M5	£36	£250	£20	<b>£306</b>
17/12/14	23/06/14	Domestic - illegally dumped/fly-tipped one large cardboard box containing five glitter cowboy hats, one child's bottle of bubbles, one metal artificial leg	MALE AGE 42 OF FY4	£100	£620	£15	<b>£735</b>

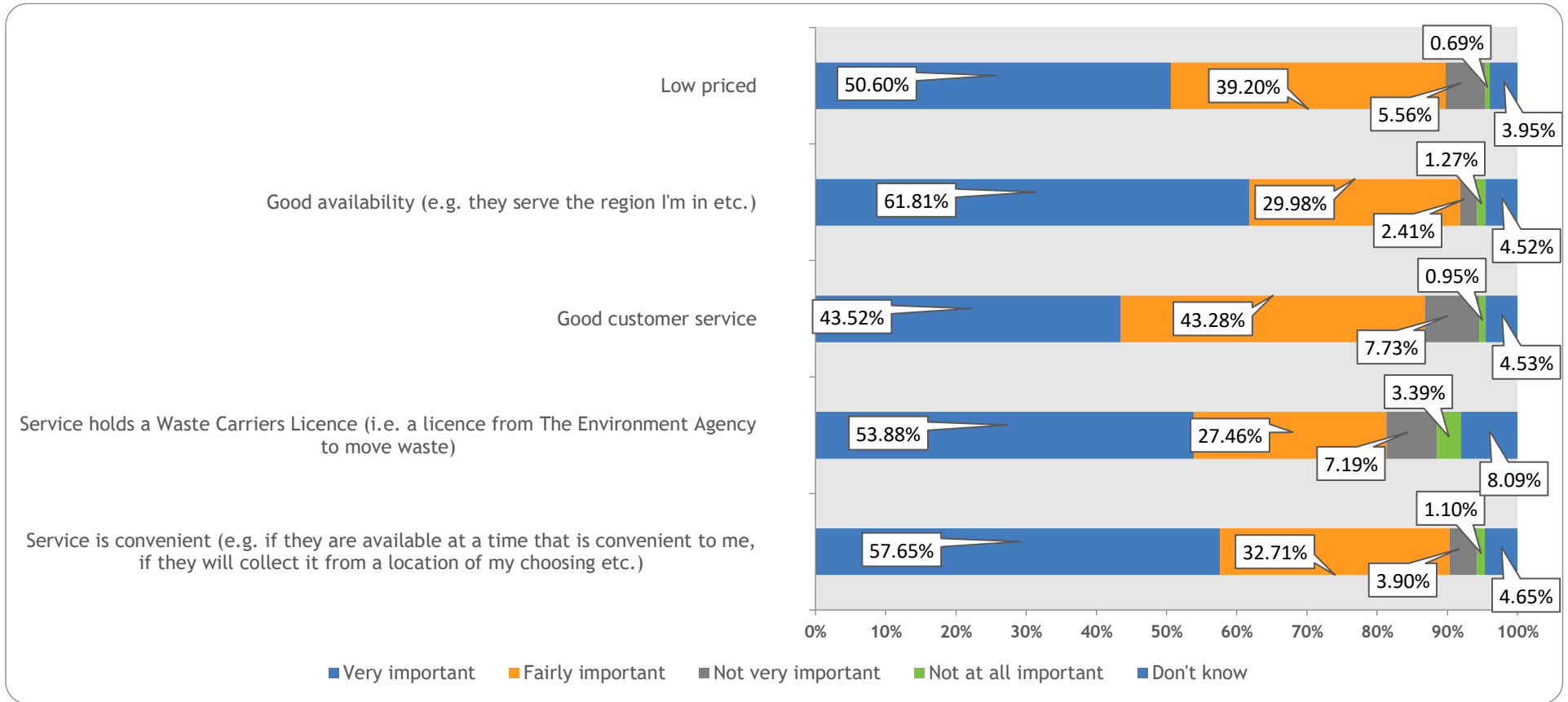
		structure, one copy of Soft Secrets news paper, cardboard and paper, on land at Elton Street					
26/11/14	11/08/14	Commercial - illegally dumped/fly-tipped a large amount of commercial and trade waste including cardboard, packaging and broken children's toys on land at Elton Street	MALE AGE 30 OF M7	£500	£500	£50	<b>£1,050</b>
08/10/14	19/06/14	Commercial - illegally dumped/fly-tipped five bin bags containing food waste and packaging on land at Montford Street	FEMALE AGE 31 OF M5	£1065	£634.68	£107	<b>£1,806.68</b>
01/10/14	28/06/14 & 29/06/14	Domestic - illegally dumped/fly-tipped six bin bags containing wall paper and general decorating waste, one bread bin, one curtain, one extractor fan, wood and general decorating waste on land at Thurlow Street, and illegally dumped/fly-tipped one cardboard box containing various greetings cards, one roll of material, one plastic washing basket, general household items and general household waste on land at Thurlow Street	MALE AGE 27 OF M5	£240	£722.58	£24	<b>£986.58</b>
01/10/14	05/06/14	Domestic - illegally dumped/fly-tipped general garden waste on land at Cecil Street,	MALE AGE 25 OF M28	£210	£672	£21	<b>£903</b>
10/09/14	30/04/14	Domestic - illegally dumped/fly-tipped ten large bin bags containing Heracleum Mantegazzianum (Giant Hogweed) on land at Cottenham Lane	MALE AGE 40 OF WA14	£1,000	£1,332	£125	<b>£2,332</b>
16/07/14	01/04/14	Domestic - illegally dumped/fly-tipped general waste on land at Cottenham Lane	MALE AGE 41 OF SK8	£500	£1,028	£50	<b>£1,578</b>
30/04/14	20/10/13	Domestic - illegally dumped/fly-tipped one bin bag containing cardboard and packaging and loose cardboard and packaging on land at Cottenham Lane	MALE AGE 43 OF PL5	£75	£414		<b>£490</b>
23/04/14	27/09/13	Domestic - illegally dumped/fly-tipped broken wooden furniture and a bed mattress on land at Cottenham Lane	MALE AGE 42 OF M27	£110	£943.32		<b>£1053.32</b>



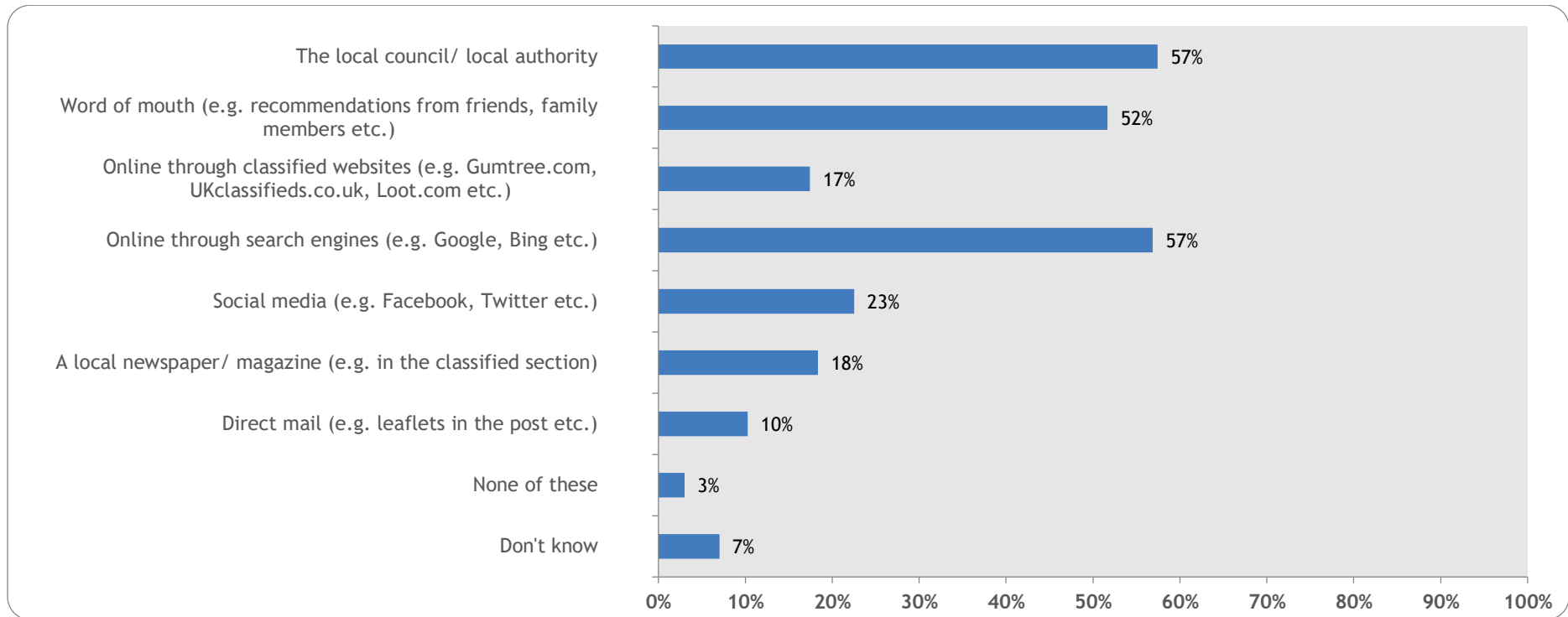
16/04/14	20/10/13	Domestic - illegally dumped/fly-tipped one bin bag containing cardboard and packaging and loose cardboard and packaging on land at Cottenham Lane	FEMALE AGE 35 OF PL5	£75	£415		<b>£490</b>
09/04/14	03/12/13 04/12/13 09/12/13	Domestic - illegally dumped/fly-tipped cardboard, plastic, polythene and general waste on land at Elton Street and illegally dumped/fly-tipped eight bin bags containing cardboard and general waste on land at Elton Street	MALE AGE 30 OF M8	£100	£460	£20	<b>£580</b>
09/04/14	28/10/13	Domestic - illegally dumped/fly-tipped cardboard, general decorating waste, general household waste and wood on land at Cutnook Lane	MALE AGE 42 OF M27	£35	£310	£20	<b>£365</b>
09/04/14	12/10/14	Domestic - threw down, dropped or otherwise deposited one bottle and three soiled tissues (human excrement) on land at Cottenham Lane	MALE AGE 47 OF OL3	£80	£235	£20	<b>£335</b>
19/03/14	01/11/13	Domestic - illegally dumped/fly-tipped a large amount of cardboard and packaging on land at Elton Street,	MALE AGE 41 OF M25	£185	£1,006.32		<b>£1191.32</b>
19/03/14	20/09/13	Commercial - illegally dumped/fly-tipped five tyres on land at Cottenham Lane	MALE AGE 65 OF M8	£360	£931.62	£36	<b>£1,327.62</b>
19/03/14	22/09/13	Domestic - illegally dumped/fly-tipped three bin bags containing general household waste on land at Elton Street, Salford	MALE AGE 44 OF M9	£200	£754.50	£20	<b>£974.50</b>
19/03/14	28/08/13	Domestic- illegally dumped/fly-tipped three bin bags containing general shop waste on land at Elton Street, Salford	MALE AGE 22 OF M8	£110	£400	£20	<b>£530</b>
19/03/14	07/08/13	Domestic - illegally dumped/fly-tipped cardboard and polystyrene on land at Montford Street,	MALE AGE 25 OF M6	£215	£400	£21.50	<b>£636.50</b>
19/03/14	07/05/13	Domestic - illegally dumped/fly-tipped bin bags, general building waste, general decorating waste and wood on land at Montford Street	MALE AGE 40 OF M20	£110	£400	£20	<b>£530</b>

## Appendix 3: Results of the YouGov Survey

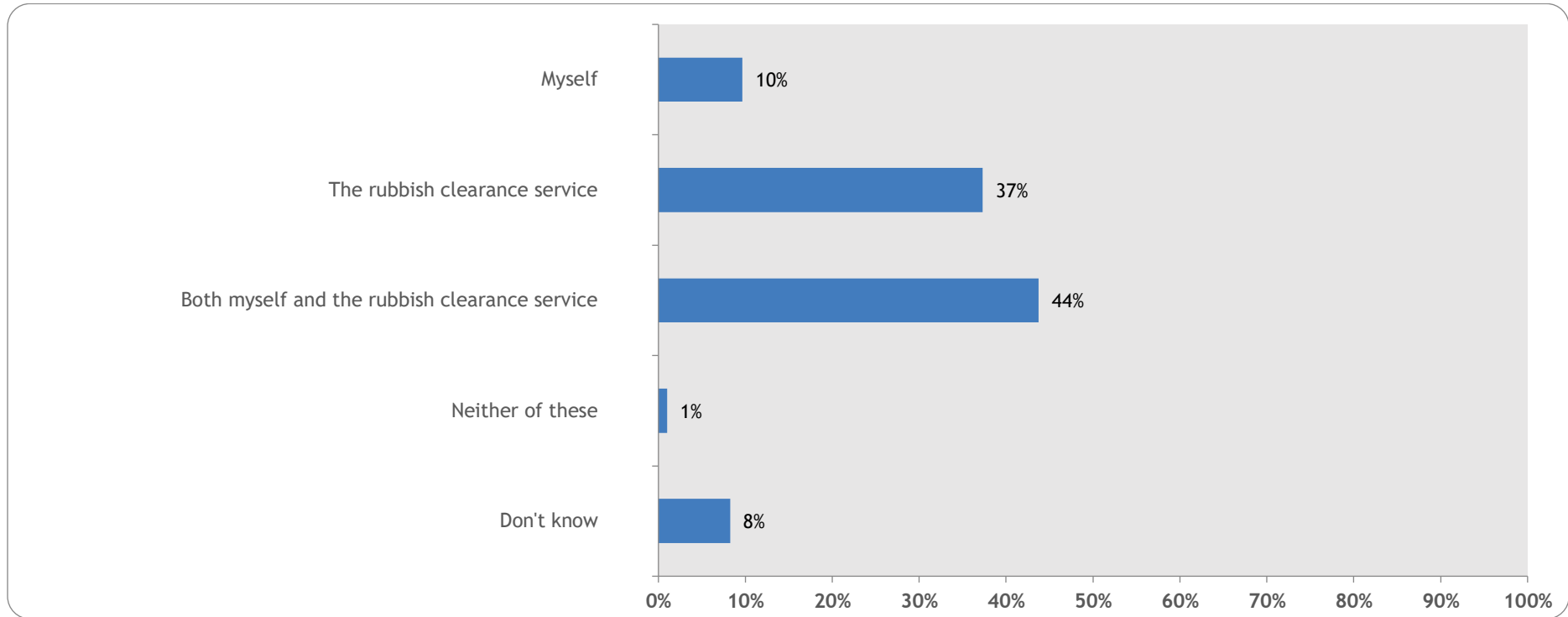
**Question: Please imagine you were choosing a rubbish clearance service, and had decided to use a paid-for service, how important, if at all, would each of the following be to your choice of which service to use? (Please select one option on each row)**



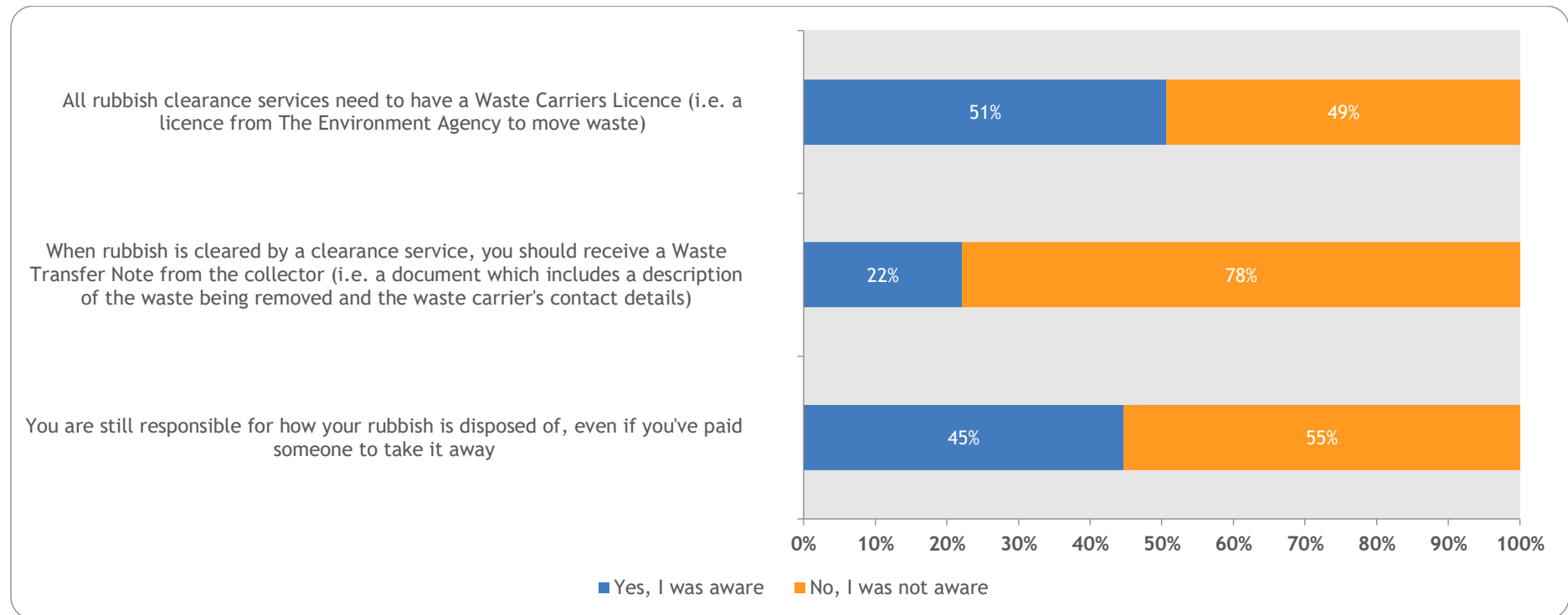
**Question: Still imagining you were choosing a paid-for rubbish clearance service...which, if any, of the following would you use to find this type of service?**



**Question: Please imagine a rubbish clearance service had collected your unwanted items of rubbish, but then subsequently "fly-tipped" it (i.e. illegally dumped it). Which, if any, of the following people do you think could be fined for this fly-tipping? (Please select the option that best applies)**



**Question: Before taking this survey, were you aware of each of the following?**



## Appendix 4: Local Authority Bulky Waste Collection Charges

### **Bolton:**

- £30 for up to 5 items, £60 for 6 to 10 items, £90 for 11 to 15 items, £120 for 16 to 20 items

### **Bury:**

- £35 for up to 5 items

### **Manchester:**

- one free collection of up to three items per year (April 1 – 31 March).
- £27 for up to three items and £54 for up to six items

### **Oldham:**

- £18 for three items, £8.50 for additional items
- £10 additional charge for fridges

### **Rochdale:**

- up to 3 items £19.80, £5 per additional item
- fridge, freezer, cooker, dishwasher: £29.80 per item
- other large electrical items: up to 2 items £29.80. £5 per additional item
- small electrical items: up to 5 items £29.80, includes music systems, microwaves, TVs. £5.96 per additional item

### **Salford:**

- four items of bulky waste at a cost of £42 per collection
- fridges/freezers, washing machines, dishwashers, tumble dryers, ovens, other large domestic appliances an additional charge of £42

### **Stockport:**

- £18.82 for 1 item, £37.50 for 2 items, £56.72 for 3 to 8 items
- £109.78 per hour for garden and building collection

### **Tameside:**

- £30.00 administration charge for the service

### **Trafford:**

- £32 for up to five items

### **Wigan:**

- £10.80 for one collection of up to three bulky waste items per property in a 12-month period
- One or two extra items can be added to the collection at a cost of £5.40 per item
- Extra collections in a 12-month period cost £85.50 each