



Litter Prevention Strategy

2020 - 2023

Introduction

This plan sets out the strategic approach to tackling litter and flytipping both on the Loch Lomond & The Trossachs National Park Authority's own estate and across the wider National Park, by working in partnership with others. It acknowledges waste prevention as fundamental to this, recognising the need to tackle litter as a symptom of the wider global climate emergency, and not in isolation.

Litter and flytipping are longstanding environmental challenges for Loch Lomond & The Trossachs National Park. Sadly, they are not a unique issues to the National Park, with national indicators showing a downward trend for local environmental quality across the country.¹ However, against the backdrop of the National Park's beautiful environment, litter stands out in stark contrast. It damages important habitats, impacts the unique landscape and people's experience of it, and takes significant resource to clear up. This is why the National Park Authority committed to leading the way to tackling litter in Our [5-Year Plan](#).

To effectively address litter as a society, we must prevent it before it has entered our environment. Whilst we will continue to reactively clean up litter, this strategy outlines the National Park Authority's approach to breaking the cycle of littering through prevention.

The Scottish Government's [National Litter Strategy](#) outlines three pillars to litter prevention, which are mirrored within our plan: effective engagement, appropriate infrastructure and proportionate enforcement. We will use these pillars to structure our work, and develop actions to target the immediate damaging issues seen in the Park: litter and flytipping associated with irresponsible camping, day trippers and picnickers, and accumulations at 'honeypot' sites.

In addition to being a standalone issue, litter is inextricably linked with waste reduction and by extension to our collective response to the global climate emergency. Minimising the amount of resources, energy and materials required to produce things in the first place has obvious climate benefit, which counts toward ending Scotland's contribution to climate change, but it also effectively limits the amount of waste that might end up as litter. The National Park Authority's waste reduction work is now captured within our Mission Zero Climate Emergency work, including our ambitions to reduce emissions associated with waste generated across our Estate and our engagement with partners to support their own waste reduction journeys.

Litter and flytipping are not issues that we can tackle alone. Whilst this plan outlines the work of the National Park Authority in the coming years to 2023, true success will only occur when our partners join us in making this long term vision a reality. So, to deliver this plan, we will draw together and lead a joint action group of relevant local stakeholders and national experts, to work towards a rolling action plan to shift the paradigm on litter and flytipping in the National Park.

¹ [Local Environmental Quality in Decline: Keep Scotland Beautiful, 2017](#)

Vision

The long term vision this strategy sets out is that:

‘Loch Lomond & The Trossachs National Park is a litter and flytipping free environment, where all stakeholders are invested in preventing litter and flytipping, and taking action to tackle ‘throwaway’ culture.’

In this long term vision:

- Litter and flytipping no longer blight the natural environment; important habitats and landscape qualities are better protected, improving human and animal welfare as a result.
- All stakeholders, including partner organisations, businesses, communities and visitors, appreciate the negative impacts of litter and flytipping within the National Park, and are motivated to actively reduce this.
- The National Park Authority lead a coalition of partners on a waste reduction journey, driving action to challenge throwaway culture and maximise the reduction, reuse and recycling of resources, as part of our wider response to the climate emergency.

Background

1.1 National context

Whilst the National Park faces a unique set of challenges (see section 1.3), the issue of litter is certainly not unique to the area. [Keep Scotland Beautiful](#) report that nationally, litter continues to be at the worst recorded levels in over a decade. A combination of political, social and economic factors has interacted to cause this decline, indicating the complexity in effectively tackling litter. The factors that are at play across Scotland are, of course, relevant to the National Park, so this strategy and the actions deriving from it should also be considered within this wider context.

Therefore, our work on littering is closely aligned with ambitions outlined by the Scottish Government within the 2014 National Litter Strategy, [Towards a Litter free Scotland](#), which recognises the social, environmental and economic benefits derived from a cleaner Scotland. This also outlines the need to focus first on prevention and work in a collaborative, cross-sector manner. The national document outlines three cornerstones to litter prevention: information, infrastructure and enforcement. These themes are mirrored within this strategy.

In 2019, the National Litter Strategy was brought for review by a steering group of experts, led by Zero Waste Scotland. The National Park Authority have advised as part of this steering group and support the continued efforts towards improving litter prevention across Scotland.

Successful delivery of a National Park litter prevention strategy will also support the aspirations of the national [Marine Litter Strategy](#) (also due for review in 2020), minimising the amount of litter entering the marine and coastal environment, a particular issue for sealochs within the National Park.

In the wider waste context, tackling throwaway culture has been identified as one of the target areas to achieve the Scottish Government’s climate emergency ambitions by moving to a circular economy. Litter is a direct loss to the circular economy as it is materials and

resources which have not been captured for reuse, repair or recycling. For example, some of the benefits of the forthcoming deposit return scheme are estimated at 31,000 fewer plastic bottles littered every day, adding up to a £61m saving on tackling the indirect costs of littering. Reframing litter explicitly to ensure it is considered in this manner further emphasises the urgency with which we need to approach this environmental issue.

1.2 National Park Authority: committed to tackling litter

The National Park Authority's fundamental aims are outlined within the National Parks (Scotland) Act 2000, which guide all of the work we undertake. The first aim is to 'conserve and enhance the natural and cultural heritage of the area'. We see litter as a direct threat to this: litter damages natural habitats, negatively affects people's experience of the landscape and needlessly diverts resources away from other conservation activities.

The commitment to tackle litter is expressed as one of our priority actions within Our [5-Year Plan](#), which explicitly sets the context for this renewed strategy on litter prevention:

'Working in collaboration, we will support a Marine Litter Strategy and drive the development of a cross-organisation National Park Litter Strategy which better utilises our collective capacity with our partners to deal with the litter generated by visitors. We will invest our passion, commitment, resources and powers to deliver positive behaviour change to prevent and reduce litter in the National Park.'

However, the issue of litter is ubiquitous and impacts every strand of our work outlined within our [National Park Partnership Plan](#): with challenges arising within our visitor experience activities; the negative consequences felt in our conservation work; and cascading impacts on the opportunities within community life and rural development.

The particular outcomes that this strategy will help to deliver are:

- **Outcome 1:** The Park's natural resources are enhanced for future generations: important habitats are protected, restored and better connected on a landscape scale.
- **Outcome 2:** The Park's special landscape qualities and sense of place are conserved and enhanced with more opportunities to enjoy and experience them.
- **Outcome 8:** The most popular parts of the National Park which experience pressures are managed to ensure that the quality of the environment, visitor experience and community life are protected and enhanced.

Further benefits are likely to cascade to outcome 9 (increasing opportunities for engagement, volunteering and education) and outcome 13 (the Park's communities are supported to influence and deliver actions that improve their quality of life and place).

In addition, improving the management of litter within the National Park will also support the delivery of specific operational plans, particularly the [Wild Park](#) biodiversity action programme and our broader [visitor engagement and enforcement policies](#).

1.3 Particular pressures in the National Park

The National Park spans 720 square miles of some of the country's most magnificent landscapes, from high mountain terrain, beautiful woodland and spectacular lochs. The beauty of the National Park is enjoyed by more than 15,000 people who live here and an

estimated four million people visiting annually – making it one of Scotland’s most popular countryside destinations.

The rurality, yet accessibility of the National Park combine to create unique pressures in tackling litter and flytipping. The majority of our visitors arrive by car from the central belt and are accustomed to the infrastructure and supporting services from an urban environment. Moreover, the demand for these services varies throughout the year, though generally peaking in mid-summer at some extremely popular sites. Building in responsive and flexible infrastructure and services to deal with these pressures is time consuming and logistically challenging.

One of the other unique pressures within the National Park is the patchwork of responsibility for litter, flytipping and wider waste management. There is an understandable misconception that the National Park Authority is responsible for all litter, but this is far from the case. The National Park covers four local authority areas, public or charitable organisations’ land (such as Forestry and Land Scotland, RSPB or Nature Scot) and a number of private estates or farms - all of which have differing equipment, schedules and policies on litter and waste management. Unfortunately, this can lead to some inconsistencies and subsequent confusion when it comes to dealing with litter and designing interventions to prevent it.

Due to the complexities of the place and the different activities happening across the National Park, littering manifests in many different guises. Common littering types are associated with:

- ‘Honeypot’ sites, characterised by large accumulations of litter left after a large influx of people, including day visitor’s picnic and BBQ sites;
- Camping, particularly around fire sites with associated flytipping of tents and other large items, plus waste associated with irresponsible toileting;
- Roadsides, both thrown from windows and bags left in laybys;
- Marine litter, washed up on our sealoch shores;
- General flytipping of commercial or household waste.

Whilst this is not an exhaustive list of littering types in the National Park, it does allow us to begin understanding the common pressures.

The National Park Authority already commits significant resource towards litter management. In 2017/18, litter cost the Authority alone an estimated £860,000: predominantly in litter collection and disposal, and in engaging our visitors with litter prevention messaging. This figure will be a fraction of the total cost of litter to the National Park – both in direct costs (e.g. to local authorities in litter and waste collection) and indirectly in ‘disamenity’ to the environment, tourism and local communities. This strategy draws together this existing work with future goals, providing a framework to work with our collation of partners, to better tackle the issues in a targeted and joined up manner.

2. The Litter Prevention Strategy

2.1 Strategy delivery

Litter is not a problem the National Park Authority are responsible for tackling alone. Across the National Park there are a number of stakeholders integral to litter and waste management: from the four Local Authorities, to other public and private landowners, to businesses and communities working and living here. Effective litter prevention and a systemic shift towards prevention will require collaboration from all parties.

This strategy has been written by the National Park Authority, having spent time working with and understanding the positions and needs of stakeholders who have a role to play in delivering a vision of a litter free National Park. To achieve the changes that are needed to deliver the vision will require the buy-in of stakeholders across the National Park, alongside engagement from national litter, flytipping and waste experts. In order to facilitate this, the National Park Authority will draw together these stakeholders into a joint action group to develop and deliver a shared plan. By agreeing projects to form this action plan, specific objectives can be set and monitored throughout the period this strategy covers (2020 - 2023).

2.2 Strategy structure

This strategy's structure mirrors that of the existing National Litter Strategy, with three complementary pillars interlinking for overall maximum impact. These pillars of engagement, infrastructure and enforcement each have its own priorities for action, creating a framework through which we will structure our subsequent work on litter prevention.

Given the immediacy of the issues seen in the National Park, this strategy focuses actions on litter and flytipping specifically, to focus effort onto tackling these directly. However, we will always seek to reduce waste in the first place, and minimise landfill by reusing or recycling where we can, as outlined in the waste hierarchy. This strategy therefore should be considered in conjunction with the National Park Authority's Mission Zero and climate action plans, where actions on waste reduction will be outlined and reported on.

3. The priorities

3.1 Engagement

3.1.1 Engagement ambition

We will use clear, consistent and compelling messaging to communicate our ambitions on litter and flytipping prevention, focusing on changing behaviour by promoting personal responsibility for litter and waste.

3.1.2 Engagement context

Effective engagement and communications allows us to tell our story about litter and flytipping prevention, share why we are so passionate about protecting the National Park's environment and encourage everyone to play their part. It is critical for pulling together all of our litter prevention work into a package that is engaging and understandable for all audiences.

The National Park Authority have consistently promoted the 'take your litter home' message to our visitors, encouraging them to take personal responsibility for the waste they have produced, though this is not consistent across all areas of the National Park. This message

will remain at the heart of our litter prevention communication, and we will continue to reinforce this to ensure that people come to the National Park with a plan for how they will pack their litter and waste back out.

From sharing messaging via social media and our website, through to on-site information and signage, we have a wide range of communication channels available. In particular, our in-person engagement has proved one of the most impactful when delivering litter prevention information. Both our Ranger Service and Volunteers are critical to this success as they are often the people members of the public engage with first. A series of resources including anti-littering bags and leaflets have been created to better engage with visitors.

In addition, we have had particular success when focussing our communications at specific audiences and single waste behaviours. For example, our human waste campaign took a targeted approach to irresponsible toileting and began conversations changing behaviour around this particularly difficult subject. We will pull this approach into our litter prevention messaging.

Through this strategy we will seek to expand upon the success of our engagement with targeted audiences, focusing on changing behaviours by promoting personal responsibility over litter and waste. Whilst we can deliver these communications ourselves, with the support of the steering group partners reinforcing these, we will hugely increase the reach and effectiveness of the messaging.

3.1.3 Engagement - key priorities

1. Integrate litter prevention messaging into a responsible visitor behaviour communications campaign, targeting new and inexperienced audiences to educate them on appropriate behaviours in rural environments.
2. Increase and deepen engagement with volunteers and scheduled groups, in particular building on our litter picking opportunities to target heavily littered, harder to reach sites across the National Park.
3. Continue to engage with the Scottish Government and Zero Waste Scotland to support the review of the National Litter Strategy and to assist with the implementation of subsequent projects.

3.2 Infrastructure

3.2.1 Infrastructure ambition

We will collaborate with partners to strengthen the litter infrastructure, ensuring everyone understands what to do with their litter and waste, wherever they are in the National Park.

3.2.2 Infrastructure context

Litter and waste infrastructure goes beyond just bins. Whilst of course bins play an integral part, infrastructure also incorporates all the supporting systems which enable litter free places. This includes litter, flytipping and waste management policies, litter picking schedules, monitoring and evaluation processes, networks of litter management organisations and Scottish Government direction on litter and waste.

Reflecting the complexity of the landownership across the National Park, infrastructure for litter is varied, with different stakeholders taking differing approaches (e.g. whether or not to place bins in laybys). Whilst there are various operational reasons behind this infrastructure,

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for members of the public the lack of consistency can sometimes be confusing or frustrating, and potentially contribute to littering behaviours.

As a National Park Authority, we have always encouraged our visitors to take personal responsibility for the waste they have produced, and as such, promote a 'take your litter home' message. This 'leave no trace' ethos is commonplace across other National Parks or conservation groups, and seeks to preserve the character of the site and protect the environment. Our infrastructure reflects this ethos, with minimal on-site infrastructure to reinforce personal responsibility for litter.

There are some particularly popular 'honeypot' sites where there are bins. We would promote only placing bins onto a site where the risk of littering is particularly high and where they can be efficiently supported with a servicing plan, as from experience we have found that bins often lead to more issues where people leave litter alongside them. Where we have bins, we will endeavour to promote and support recycling when appropriate.

Through this strategy we will seek to bring together stakeholders from across the National Park to provide appropriate, fit for purpose infrastructure, supported by effective and joined up service delivery.

3.2.3 Infrastructure - key priorities

1. Establish a cross-sector stakeholder and expert steering group, who will drive action from the strategy.
2. Review our infrastructure, in conjunction with our partners, to ensure it is fit for purpose, consistent and effective.
3. Maintain a regular auditing and review process, established through the monitoring of our Camping Management Byelaws, which enables efficient site management decisions to be made.

3.3 Enforcement

3.3.1 Enforcement ambition

We will uphold robust enforcement strategies, designing these as a deterrent to future behaviour by highlighting the negative consequences of littering and flytipping.

3.3.2 Enforcement context

All Local Authorities in Scotland have enforcement powers available to tackle littering and flytipping. This power is underpinned by the Environment Protection Act 1990 (EPA). As a National Park Authority, we were granted with the powers to enforce against littering and flytipping under sections 33 and 87 of the EPA in April 2015.

The legislation carries the provision to offer Fixed Penalty Notices (FPN), where appropriate, as an alternative to a report to the Crown Office and Procurator Fiscal Service (COPFS). The penalty for flytipping under the FPN provision is currently £200 and for littering it is £80. However, if a FPN is not utilised and the case is referred to the COPFS, this can result in a variety of financial sanctions being imposed by the courts following a successful prosecution.

Applying the provisions available under this legislation carries considerable responsibility to ensure that action pursued is proportionate, consistent, transparent and in the public interest. We only utilise our enforcement powers as a last resort. Wherever possible, engagement with members of the public, to encourage an understanding of the negative

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impacts of littering or flytipping in order to change behaviour and limit these crimes in the first place, is always the preferred method.

Piecing together enough evidence to take forward these cases can be challenging and take a significant amount of staff time from detection to achieving a conclusion. The majority of the enforcement work undertaken by the National Park Authority has involved abandoned, fly-tipped campsites. These cases have involved direct reports to the Procurator Fiscal and offering FPN to those identified as having allegedly committed the offence. To date, no action has been pursued in relation to littering.

We have developed a robust approach to enforcement, including a suite of bespoke training and educational materials through which we annually train all our authorised staff in how to effectively and consistently deploy these powers. Our in-house procedures have been developed with, and continue to be supported by, Police Scotland, who we have a long-standing partnership with.

In addition to the partnership with Police Scotland, we have invested time developing the awareness of the COPFS and local Justices of the Peace in relation to the work carried out by the National Park Authority. This link is critical in highlighting the challenges experienced when enforcing legislation and gives the staff at the COPFS the insight required to consider the full environmental, social and economic ramifications of littering and flytipping in the National Park. This ongoing communication has proven useful, as the majority of cases reported have been taken forward by the Procurator Fiscal.

Through this strategy, we will seek to work closer with partners to increase the visibility of enforcement cases within the National Park, in order to strengthen the deterrent effect of this work.

3.3.3 Enforcement - key priorities

1. Continue to engage with the wider enforcement system, maintaining our relationships with Police Scotland and the COPFS to ensure that littering and flytipping cases are reported and taken seriously.
2. Ensure continued quality of enforcement activity both internally through our Ranger Service, with the four local authorities and other stakeholders in the National Park, aiming to coordinate enforcement activity, make best use of resources and to jointly issue communications, aiming to amplify the overall impact of enforcement.
3. Increase the visibility and deterrent effect of enforcement by highlighting the personal impacts linked to littering and flytipping, utilising positive enforcement cases from the National Park in our communications.