



Improved Management of Contaminated Aquifers by Integration of Source Tracking, Monitoring Tools and Decision Strategies



**Notes from the third Project Income workshop titled 'Decades of illegal dump sites. Are we really unable to find a path towards effective *solutions?* '**



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On Thursday 19.05.2011, at the premises of JP Vodovod-Kanalizacija d.o.o., a third workshop, titled 'Decades of illegal dump sites. Are we really unable to find a path towards effective solutions?' was held as part of the project Income. Participants at the meeting were experts, representatives of NGOs, local and national institutions, employees of municipal utilities, and the general public. Participants at the workshop looked at what are the causes, conditions and factors for the formation occurrence of illegal dumping sites, what is the role of different institutions in solving such problems, what are the measures that have so far been identified as effective and ineffective, and what solutions would be successful and effective in solving the problem. The workshop was held from 9 until 12 in the morning and was attended by 28 participants.

In the introduction to the workshop, the guest and participant of the workshop, Janez Matos, a member of the Society of Ecologists Without Borders, presented the Register of illegal dump sites. Peter Meglič from the Geological Survey of Slovenia, a partner of project Income, presented an application for the City Administration of the Municipality of Ljubljana that provides quick and easy displays of the requirements for rehabilitation of illegal dump sites. Concurrently, in a GIS environment the application provides easy entry of information on new dump sites, and information analysis that does not require expert knowledge. One of the purposes of the project Income is creating tools for decision makers to manage the different areas affecting land use in terms of protection of water resources.

Why are the illegal dump sites dangerous? Apart from their unattractive visual component, they represent a threat to human health and the natural environment. They are one of the culprits responsible for pollution of drinking water, soil and air, they spoil the appearance of the landscape, reduce the value of real estate and tourism opportunities, and they also represent several million Euros of costs per year. Regular cleaning, as emphasised by Janez Matos from the Society of Ecologists Without Borders, is not a long-term solution, and is already a 20-year fight in Slovenia without real results. At the same time there is fragmentation and duplication of actions and resources. Regular monitoring and control of illegal dump sites is very expensive, while projects such as the Register of illegal dump sites (<http://register.ocistimo.si/>) undoubtedly contribute to a clearer overview of the problem.





In addition to problems of currently active illegal dump sites, the participants raised the problem of old dump sites and old burdens, among which we include former legal and illegal municipal dump sites that are currently closed, but are largely inadequately rehabilitated, and former illegal dump sites that are now covered naturally or as a result of human activities that in most cases have taken place without professional supervision. The problem of old burdens is hidden out of sight and therefore less recognised by the general public, yet no less dangerous to water resources.

### **Causes for the formation of illegal dump sites and factors that promote them**

The workshop expounded many constructive observations and suggestions. The workshop participants ranked among the main causes of the formation of illegal dump sites, indifference, negligence, low awareness, consumerism, as well as ignorance and consequently an inappropriate attitude towards the environment.

Despite the possibility of free disposal at a landfill and free periodic removal of bulky waste (appliances, electronics, and furniture), such waste is still fly-tipped into the environment.

Factors that promote the formation of illegal dump sites are accessibility and proximity of lands that are not economically exploited and give the impression of not being owned. In areas where the illegal dumping of waste is already taking place, further fly-tipping only intensifies.

Unregulated collection and processing of construction waste is a factor which when organised properly throughout Slovenia, would lead to significant progress in reducing the number of illegal dump sites. Today, businesses avoid the financial burden of proper legal disposal of construction waste with illegal disposal in nature. The deficient traceability of construction waste disposal is also a deficiency in the process of construction waste management. An additional obstacle in handing over construction waste is caused by the strict requirements for the preparation of construction waste prior to disposal.

The current state of a poorly informed population is not only due to the lack of information about the conditions and locations where construction and bulky waste material can be disposed of, but also springs from disinterest.

The otherwise appropriate legislation, allowing the operation of competent authorities at the local and national level, is completely ineffective, as these do not regard the problems of illegal dump sites as one of their priorities. The lack of professional personnel and the uncoordinated work of various supervisory authorities is already a recognised problem. Participants stressed that on the other hand, effective work of inspection bodies is not possible, as legislative





regulations are to some extent even contradictory. Participants expressed hesitancy on whether the legislation was being properly utilised, as an impression is being formed that not even legal experts fully utilise all the potentials already provided by the legislature in their procedures. In addition, the division of competencies of inspection duties on a local and national level complicates coordinated work and allows for inadmissible evasion of responsibility.

Due to the inactivity of competent agencies, offenders are aware that the likelihood of sanctions against them is low, thus, the inadequate criminal justice policy encourages illegal activity. There are virtually no visible preventive functions by supervisory authorities, and there are no responses to current problems.

The speakers also stressed the absence of economic approaches to encourage environmentally-friendly disposal, while participants deplored over the absence of economic mechanisms to encourage the return of waste.

They also noted the lack of educational programmes in the area of environmental protection at specific levels of education, especially at the level of vocational education, in which future trades and craftsmen are trained. These artisans, especially those with small-scale activities, are among the less environmentally sensitive population.

### **Are we environmentally sensitive?**

According to most of the representatives, the environmental sensitivity of the population has increased in recent years, also evident in last year's successful campaign Očistimo Slovenijo (Let's clean Slovenia). On the other hand, a survey researching the awareness of the population on issues related to groundwater (Income, Smrekar et al., <http://www.life-income.si/strokovna-gradiva>) unequivocally does not confirm this. People generally acknowledge that the environment is a value, but willingness to marked changes outside their own backyards can not be observed.

### **Can we find ways to appropriate solutions?**

The participants agreed that rehabilitation of illegal dump sites is inappropriate to resolving this problem, as long as the reasons for their formation and supporting factors remain unchanged. It is in the elimination of these reasons and supporting factors that most of the changes are expected from competent institutions.

The participants expressed serious doubt on whether the placement of signs, warning that illegal dumping of waste is prohibited, is a sensible primary instrument for preventing fly-tipping in nature. The placement of obstacles and





barriers is also not a suitable solution, as experience has shown that offenders merely circumvent them. Real or dummy cameras are also a weak tool to prevent fly-tipping.

A systemic approach to the issue must be established, which among other things, would include education and awareness of environmental issues throughout the educational process. While the educational content is emphasised in the early part of elementary education, it is insufficiently present during adolescence. Part of the teenage population is quite insensitive to these problems. It is necessary to raise their interest by integrating contents into the educational system and with other approaches.

Competent inspection bodies must devote their attention to the illegal disposal of waste on a larger scale than before. The Society of Ecologists Without Borders will periodically check the extent of the handled cases and publish them publicly. In this manner, they will try to gain more attention for this subject through public pressure. Greater horizontal, and interministerial coordination, as well as vertical coordination between the state and local communities is expected from the competent institutions. A review of the legal basis for transferring competency of preventive control to the municipal level (e.g. municipal constabulary) is proposed.

The focus must be placed on informing the general public of the problem of illegal dump sites, emphasising the importance of preventing the spread of these dump sites, and how the public can contribute. We need easily accessible and broad information on how offenders can be reported, and also information on where and under what conditions can waste be disposed of.

Participants of the workshop also identified changing the land use in critical areas as an appropriate solution for preventing the spread of illegal dump sites.

Financial incentives (old for new) for certain types of waste where possible, are expected to be an encouragement. The participants received information that this action is not feasible for certain types of waste due to non-compliance with EU regulations.

We are not familiar with any high-profile cases in Slovenian media, where a private or legal person was sanctioned for fly-tipping. While potential offenders are still encouraged to commit offences because the likelihood of criminal proceedings is low, there will be no changes in the field. The participants suggested that some successfully resolved





problems should be deliberately exposed to the media. The public must realise that fly-tipping is a serious violation of the Criminal Code and that violators will be punished.

Rehabilitation measures are irrelevant and irrational, until there are suitable conditions in place for collecting and processing construction and bulky waste. We need an orderly system (public utility service at the regional level for construction waste, and concessionaires at the local level) where operators of these activities are economically encouraged.

The workshop participants emphasised that the consistent implementation of the requirement to provide proof of delivery of construction waste to an authorised agent, must be an imperative part of the documentation on the acquisition of an operating permit. In cases where rehabilitation is carried out without a planning permission, the solution is to raise information and environmental awareness of the investors/owners of the buildings.

#### **Stakeholders' tasks**

The participants expect from the state to establish a formal legal framework for the establishment of a public service for construction waste management. At the local level, economic incentives for the establishment of local centres and increased interest of construction waste collectors is expected. In this manner, part of the funds intended for the rehabilitation of dump sites could be directed to concessionary activity, can cover at least part of the costs and partially lower the cost of waste holders. Waste holders would have a greater interest in legally disposing of waste. It is expected that the establishment of new collection centres for bulky waste, which would be closer to residents is to be considered.

The workshop participants have developed an original idea, that it would be appropriate to consider the possibility of granting concessions for the rehabilitation of illegal dump sites and not just for the collection and processing of construction waste, which in times of economic recession would prove to be a new economic opportunity for the construction sector. The project INCOME group is expecting a response to this idea from state institutions.

The state must ensure that competent national authorities start with more intensive and coordinated interministerial prosecution of environmental laws violators.





Upgrading environmental issues in the educational processes and promoting such content through media recognisable campaigns is expected at the national level.

The state can encourage the resolution of this problem by promoting administrative assistance in obtaining funds from the EU.

The state must diligently manage state-owned land and be an example to other owners, as illegal dump sites are also located on state land.

Among the tasks municipalities will be responsible for, the participants included: economic land management, the establishment of preventive controls, monitoring of the situation, frequent removal of bulky material, awareness campaigns in cooperation with the civil society, the establishment of adequate infrastructure for waste disposal, and support for concessionary activities in the area of waste through appropriate land use planning and with economic incentives. Cooperation at an inter-municipal level is expected.

The tasks of NGOs are primarily promoting the importance of a healthy and clean environment, education and training, highlighting problems, and a pro-active role by putting pressure on persons responsible for action. Non-governmental organisations are expected to play an intermediary role between the peoples, the profession, and the local and national institutions. The promotion of volunteer work and encouragement of the population to be actively involved is also one of the important functions of NGOs.

The participants have included public waste disposal and water supply services, professional and educational institutions, chambers, political parties, and the media, among other stakeholders that can contribute in preventing the spread of illegal dump sites.

Illegal dump sites that critically threaten water resources should be given priority for rehabilitation. According to the participants, merely political will and placing the resolution of this problem to a position of priority in political party programmes, is what is needed for the resolution of the fly-tipping problem. Participants expressed a clear opinion that the rehabilitation of illegal dump sites is generally not sensible, until enough solid conditions preventing further fly-tipping are established.





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