



INVOICE FOR OUR TRAILS

#TrailsTopUp
0001

BILLED TO: **PackUK**

(on behalf of the
Department for
Environment, Food
and Rural Affairs)

PAYMENT TO: **Trash Free Trails**

2 Orwig Terrace, Brynrefail, Gwynedd, LL55 3NY
Bank : Starling Bank
Account Name : Trash Free Trails C.i.c.
Account Number : 97756499
Sort Code: 60-83-71

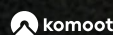
Description	Quantity	Cost
THIS IS THE TRUE COSTS OF KEEPING OUR TRAILS CLEAN		
Volunteer Hours @ £19.67 (Average Hourly Wage in the UK)	4,606	£90,600.02
Trash Free Trails: Annual Organisational Costs of Trail Clean Project Delivery (£75,488.98 / year for pEPR items)	6	£452,933.20
Environmental Impact Costs (22p / item)	4,718,080	£1,037,977.60
TOTAL		£1,581,510.82

Please note this would equate to an additional fee of **£387.82** for the 4,078 businesses required to pay disposal fees under pEPR as of October 21st 2025.

Payment is required within **30 days** of invoice date.
For further information please contact hello@trashfreetrails.org

THANK YOU FOR HELPING TO PROTECT OUR WILD PLACES AND WHERE THEY TAKE US.

The State of Our Trails Report 2025: *Extended Producer Responsibility Special Edition*





THE

SINCE 2019 TRASH FREE TRAILS HAS



REMOVED AND
SURVEYED

550,826

ITEMS OF SINGLE-USE POLLUTION

WITH THE
HELP OF
7018
VOLUNTEERS

WHO HAVE
DONATED
11,515
HOURS OF
THEIR TIME

AND CLEANED
14,193
KILOMETRES
OF TRAILS

STATE

OF

88%

OF ITEMS
SURVEYED WERE
CLASSED AS
SINGLE-USE



77%



OF VOLUNTEERS
FELT MORE CONNECTED
TO THEIR WILD PLACES
AFTER TRAIL CLEANING

OUR TRAILS

2



5



40%

OF SINGLE-USE
POLLUTION FOUND IS
MADE OF MATERIAL
TYPES COVERED BY

PACKAGING EXTENDED
PRODUCER RESPONSIBILITY
IN THE UK.

THAT'S

16
ITEMS

ON EVERY KILOMETRE
OF UK TRAIL THIS
SCHEME COULD
ERADICATE

THIS REPORT IS ABOUT THE MILLIONS OF ITEMS OF
SINGLE-USE PACKAGING THAT LEAK INTO OUR WILD
PLACES EACH YEAR, AND HOW WE CAN TURN OFF THE TAP.

Introduction

Packaging and the Overlooked Cost to our Trails

The harm single-use pollution (SUP) causes to nature, to wildlife and to our experiences out on the trails is clear to see. But when it comes to taking responsibility, things get a little murky.

For decades, the big corporations driving this waste have been allowed to deliberately pass the buck. The financial burden has landed on the shoulders of tax payers and the true price has been paid by our environment. Finally, a new policy in the UK is flipping that script, placing accountability and the cost of packaging waste where it belongs: with those who profit from it.

Under packaging Extended Producer Responsibility (pEPR), any business putting packaging out into the UK market must track it, report it, and pay for its entire journey; from production, to the shelves, to recycling.

Introduced incrementally from 2023, the scheme aims to improve recycling rates, reduce packaging waste and promote a circular economy across the UK. The more easily recyclable or reusable the packaging these companies produce is, and the less material they use through smaller sizes and quantities, the lower the fees they have to pay.

Handled via PackUK - set up to run the scheme on behalf of the Department for Environment, Food and Rural Affairs (DEFRA) - the first invoices were sent out in October 2025, with the funds to be distributed to local authorities to improve waste and recycling services.

It's a simple idea with big potential; since recognising its essential role in the future of our wild places in our 2023 Report, we're thrilled to see it finally come into force. Unfortunately for our trails though, they have been left out of the funding loop.



Cleaning Up Britain?

While pEPR puts vital funds into the hands of local authorities to boost their recycling systems, there is no provision for tackling ground litter or for supporting the people who actually clean it up, particularly in our green and wild spaces.

The stewardship of our countryside, forests, trails and parks is undertaken by land owners and managers, National Park authorities, NGOs, community groups and individual volunteers. However, under the current policy, these stakeholders are completely ignored, despite 40% of the trash we find in these spaces being eligible under the scheme.

Without channelling resources to those on the ground, pEPR risks falling short of its potential to clean up Britain.

What's more, despite the need to provide data on their packaging, brands aren't required to include leakage - that which

escapes collection and ends up littering the land and waterways - in their reporting. Once again rather than the brands being accountable for their share of the responsibility, the environment is left to take the hit.

This is about more than bins and recycling targets. The introduction of pEPR has the potential to eliminate more than 4.7 million items of single-use pollution from our trails. Paired with the forthcoming Deposit Return Scheme (DRS) on drinks containers, it is a game-changing opportunity to protect and enhance the invaluable green spaces in which people connect with nature.

But without addressing these blindspots, it's an opportunity wasted. These are fixable flaws, and as an organisation standing up for our wild places and recreational trails, we have some simple recommendations to fix them.



The Aim of our Invoice

In the six years since Trash Free Trails was founded, we've agonised over the many questions that tackling single-use pollution poses. Among them, a question seemingly too big for us to ask: **how much is all this trash actually worth?**

The work PackUK has done to define this for packaging allows us to begin to answer this question for the first time. Using the information available on their calculations to create pEPR fees for producers and our wider research on global producer responsibility, we've done some maths of our own to calculate the cost of single-use pollution to recreational trails and the people who care for them.

Combining calculations on the environmental impact of single-use pollution with the broader costs of our time, resources, expertise and most vitally, volunteer donations, we're naming this fee the Trails Top Up. We've sent this Invoice and Report to PackUK to shine a light on these voiceless and overlooked ecosystems, and showcase

why proper protection for our wild places can't wait. Through this work, we aim to:

- Act as critical friends of PackUK, supporting the ambition of pEPR while challenging them to tackle the UK's single-use pollution crisis effectively and comprehensively.
- Redefine how we value our environment and the cost of neglecting it, using our volunteer-gathered data to put a real price-tag on trail pollution.
- Highlight the vital role of NGOs, charities, community groups, and volunteers - without whom we wouldn't get anywhere close to achieving Trash Free Trails.

Thanks to the hard, hopeful work of our volunteers, we have six years of data to draw from. For the first time, we are using that data to create evidence-based estimates alongside government figures on the financial cost of single-use pollution. We do so to draw closer attention to this new policy, translating its importance in protecting the spaces so important to us.

OUR INVOICE FOR OUR TRAILS HAS SEVERAL ITEMS:

Part One: The Cost of Trash on Our Trails	p008
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Part One is an explainer to accompany the Invoice.

Parts Two & Three act as wider context and detail from our analysis.

Part Four lays out our recommendations to producers, government and volunteers.

Together this is our roadmap to Extended Producer Responsibility that champions our wild places.

The Power of Citizen Science

As an NGO, we constantly tread the line between academic rigour and grassroots action. And while we might not have a full team of academics or lab resources behind us, we do have 7,018 committed volunteers - people donating their time, focus, and talent not just to our mission, but to a future where trails are truly free from single-use pollution.

Without having access to all of PackUK's data and methodologies, the figures in this Report are intended to be illustrative, but are grounded in real world data. They are captured through academically scrutinised methods, taken out onto the trails by our volunteers every day.

Our methods are built for these citizen scientists, stitching together their passion for environmental care with global standards in single-use pollution monitoring. It is robust science, powered by the people who ride, run and roam in these places.

THE COST OF TRASH ON OUR TRAILS

PART

Part One:
The Cost of Trash on our Trails

1

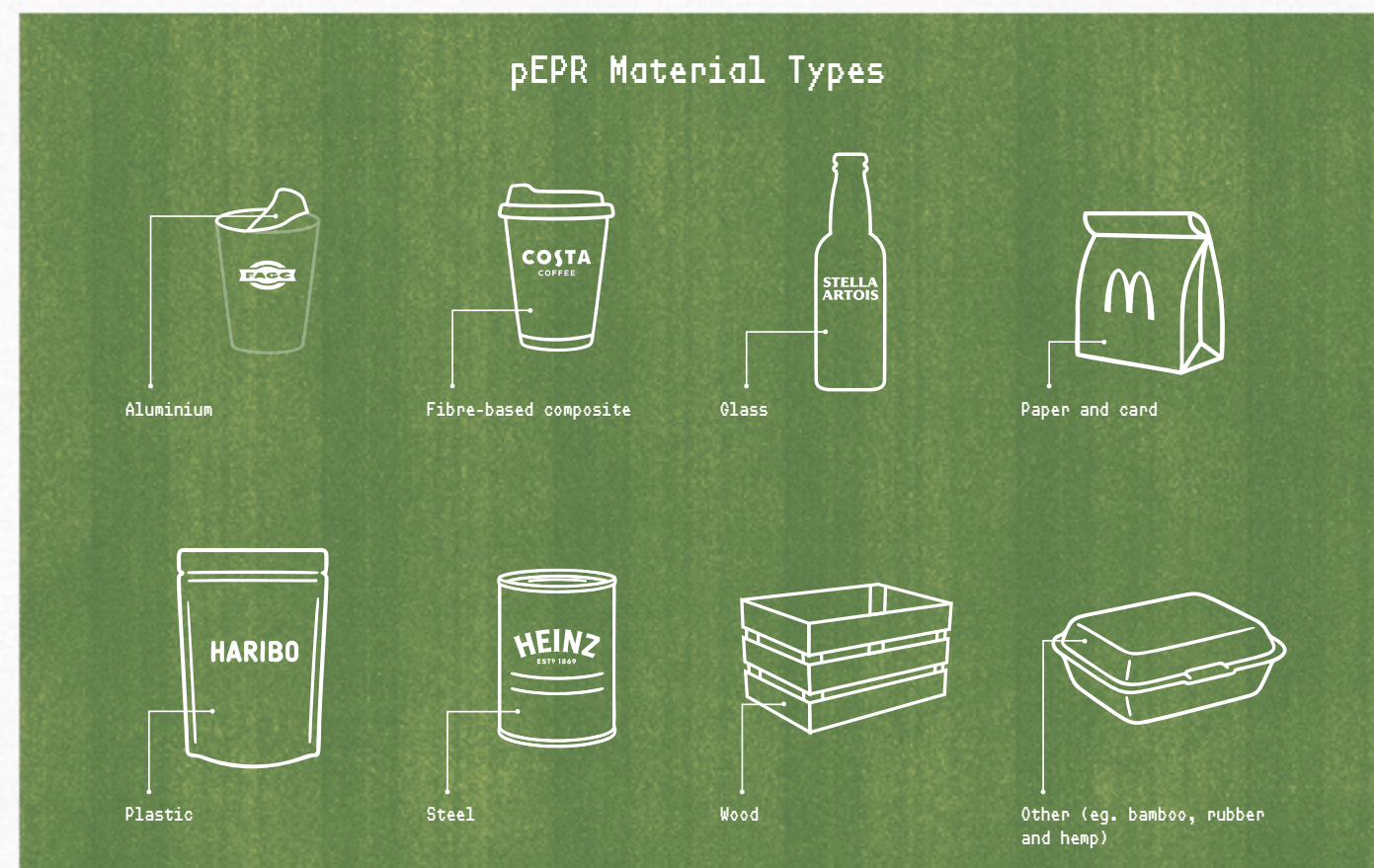
Six years of volunteer-led Surveys on our trails have yielded a wealth of data. Now, we bring together our analysis to quantify the costs of single-use pollution - insights that shape the Invoice for Our Trails on the cover of this Report.

The Composition of Trail Pollution & A pEPR Price Tag

By counting and categorising every item we remove, our Trash Surveys allow us to

take note of everything - from the types of items and materials, to the brands present, to the interactions we observe with animals, plants and ourselves.

Since 2019, our volunteers have removed over half a million items of single-use pollution. 40% of this was made of materials that are 'in scope' for pEPR - these being covered by the Scheme and requiring fees to be paid to contribute to their recycling and disposal.



This 40% excludes drinks containers eligible for the forthcoming UK Deposit Return Scheme (DRS) which we focused on in our 2024 Report.

For this Report we have analysed our single-use pollution data through the lens of pEPR material types. While some of the designated pEPR materials are less common in our trail

cleans, others are persistent, showing up in almost every Survey our volunteers report.

Confectionary wrappers, often made of plastic which tears easily into small pieces or invites the user to 'tear off' a corner to access the sweets inside, make up 14% of all trail single-use pollution. Wrapper tear offs alone make up 4%.

Top 6 pEPR Items Found on our Trails as a Proportion of all Items



What goes into the act of removing single-use pollution?

Crisp packets, glass bottles, takeaway food packaging - the act of removing these from a place you love is the visible outcome of a long, considered journey a volunteer goes on, one carefully facilitated by organisations like us. We never take the donation of time for granted; we never take the work that goes into that donation for granted either.

Akin to how PackUK has calculated pEPR material fees based on the costs incurred by Local Authorities (LAs) to manage waste and 'other relevant costs', our Invoice for Our Trails attempts to identify the costs not only to trail ecosystems, but also to those who take it upon themselves to protect and enhance them.

Based on our data, there are potentially up to **4.7 million pEPR eligible items of single-use pollution** on UK Public Rights of Way (PRoW), right now. If we used PackUK's material fees, this would raise **£34,437.10**. A substantial fee, but worth a mere 11p for every kilometre of trail.

Without taking into consideration the costs of removing, recording and reporting it, these items lack the value that's been given to those that end up in household bins. And if these items lack value, **what does that say about the places they pollute?**

Calculating Our Trails Top Up



Hours Spent Removing, Reporting & Recording pEPR items by Volunteers (if paid the UK Median Hourly Wage £19.67)

4,606 hours

£90,600.02



Costs to Trash Free Trails delivering Trail Clean Projects and Activities

6 years of Administration, Resources, Overheads & Wages

£452,933.20



Environmental Impact of pEPR items on recreational trails (22p / item)

Cost of environmental damage inflicted on trail ecosystems, reducing their 'serviceable value'

£1,037,977.60

This includes the cost Trash Free Trails has incurred as an organisation since our founding in 2019 to deliver trail cleans, citizen science and single-use pollution research programmes, and the cost of a volunteer's time at the Median Hourly Wage for the UK (£19.67). These have been calculated proportional to the 40% of pEPR eligible items we find. It's important to note that a Local Authority Litter Picker's pay is often far less than the hourly wage listed here.

We have also included an 'Environmental Impact' fee per item. The significance of this cost warrants a whole separate section, found in Part Two.

At the point of publishing this Report, our 'fee' for the removal of pEPR items on UK

Public Rights of Way is **£1,581,510.82**. If split equally between the 4,078 businesses required to pay pEPR fees as of October 21st 2025, this fee – our 'Trails Top Up' – would be only £387.82 per business. **That's less than £400 each to transform the health of our recreational trails.**

It's important to note that our illustrative figures are based solely on TFT's data, resources, time and volunteer donations. If we were to add up these for every NGO, land manager, charity, community group and individual out there removing single-use pollution from our wild places, the number on this invoice would be far higher, but its impact, if paid, would be far further reaching.

We pull these together with transparency to pose a crucial question:

***WHAT DO YOU
THINK THESE
PLACES, WHICH
MEAN SO MUCH TO
US, ARE WORTH?***



THE SERVICE OF TRAILS & ENVIRONMENTAL IMPACTS

PART

Part Two: The Service of Trails
& Environmental Impacts

2

There is widespread understanding that time spent in wild places has significant emotional, physical and social benefits. 77% of our volunteers report feeling more connected to nature after spending time trail cleaning - even if the intention isn't solely to 'get outdoors', time on our trails has substantial benefits.

Despite this, we are living in an unprecedented time of biodiversity and green space loss in the UK. We feel the benefits of

our trails as individuals, but to champion them through policy we need to speak in the same terms as schemes like pEPR - to determine their economic, cultural and environmental value.

Trail ecosystems, situated across parks, woodlands and national parks offer numerous 'services' - the cost benefits of these can be determined. Additionally, these services can be negatively impacted by the presence of single-use pollution.



Research already exists that emphasises the economic impact of pollution in our oceans through the decline of these 'ecosystem services' and a loss of natural capital - **it should be no different for their terrestrial counterparts.** Based on the work of our peers in the marine conservation sector, we have calculated an environmental impact cost of 22p per item on recreational trails, equating to just over £1 million on our Invoice.

Beyond Pounds and Pennies - Ecological and Experiential Impacts

Though we recognise the power in speaking of the value of our trails in economic terms, it is somewhat ‘against our nature’ as an organisation to reduce the impacts of single-use pollution to pounds and pennies. Below we expand beyond the sole idea of service and capture some of the ways single-use pollution affects plants, animals, soil, and human beings.



Animals

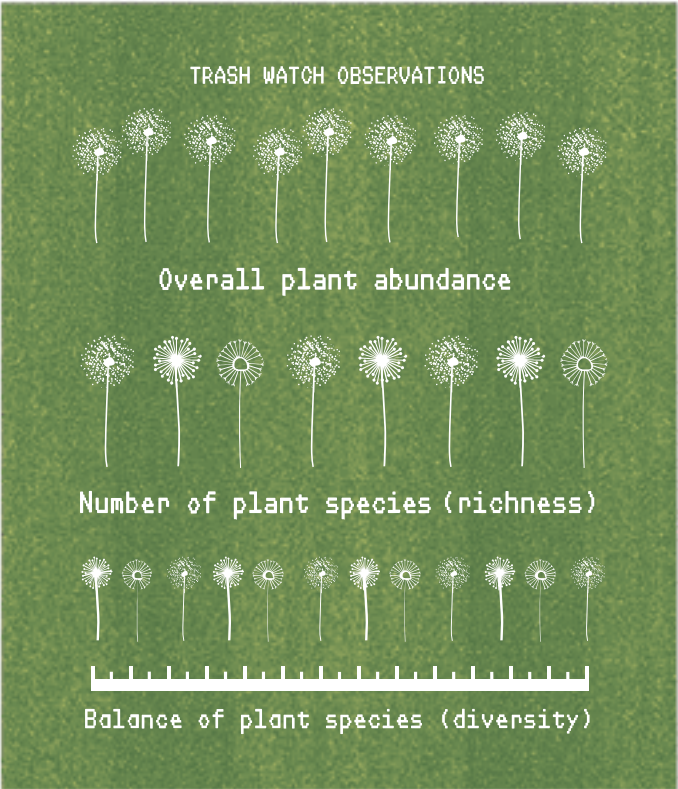
Across all our Surveys, volunteers are encouraged to identify and report examples of animal interaction they find with single-use pollution. From chew and peck marks to nesting, habitation and even devastating incidences of death through entrapment: 27% report examples

of animal interaction, with 4% of all surveys reporting incidences of animal death.

As highlighted in our 2024 Report, glass bottles pose a disproportionately significant threat of entrapment, but we are increasingly observing this with other types of pEPR eligible items, such as crisp packets.

Plants

Our Trash Watch methodology sees volunteers place collected single-use items in marked trail plots for several months or years, revisiting to observe and record impacts on:



Trash Watch has shown how single-use pollution can significantly influence floral ecosystems. By blocking light and leaching chemicals or microplastics into the soil, we observed increased plant coverage but reduced diversity. Early results support growing evidence that terrestrial single-use pollution can significantly reshape vegetation, particularly when made of plastic.

Soil

It might take over 80 years for a crisp packet to degrade, but it's the traces it leaves along the way that will scar our wild places. It's vital then, to look at the impact of microplastic and microparticle breakdown on soil composition and function.

We took soil samples from key monitoring locations in North Wales - Coed y Brenin, Coed Gwydyr and Coed Beddgelert. In all samples we found microplastics of varying sizes, including fibres consistent with synthetic textile or composite sources.

Much of the packaging we find is made of different materials stitched together - take the metallic lining in an oat milk carton for example. These composites are harder and more costly to recycle and when leaked into the environment, take longer to degrade, releasing more harmful microparticles into the soil.

Through pEPR we'll see less and less packaging like this, as the policy encourages innovation and improved packaging design, and rewards moves towards circularity. It's better for the bill producers face, and better for the trails too.



“FOR NEARLY THREE YEARS, I’VE BEEN REMOVING SINGLE-USE POLLUTION FROM A POPULAR STRETCH OF THE RIVER ELWY, AND WHILE I BELIEVE CONSUMERS MUST TAKE RESPONSIBILITY FOR THEIR WASTE, MAJOR BRANDS ALSO NEED TO BE HELD ACCOUNTABLE FOR THEIR EXCESSIVE PACKAGING - IT’S ALWAYS THE SAME ONES.”

- Mark Wilson

MARK WILSON

CASE STUDY



Along the banks of the River
Elwy in St Asaph, North Wales.

60% of items
removed in
scope for pEPR 46% plastic

74 volunteer
hours donated £1,455.58

Environmental
Impact £394.46

Total £1,850.04

Human Experience

Unique to Trash Free Trails is our ambition to understand and quantify the impact of single-use pollution on human beings; as individuals, as communities, and as advocates for our wild places. Here we share the impacts of pEPR eligible pollution on one of our volunteer Ambassadors and River Elwy he loves.

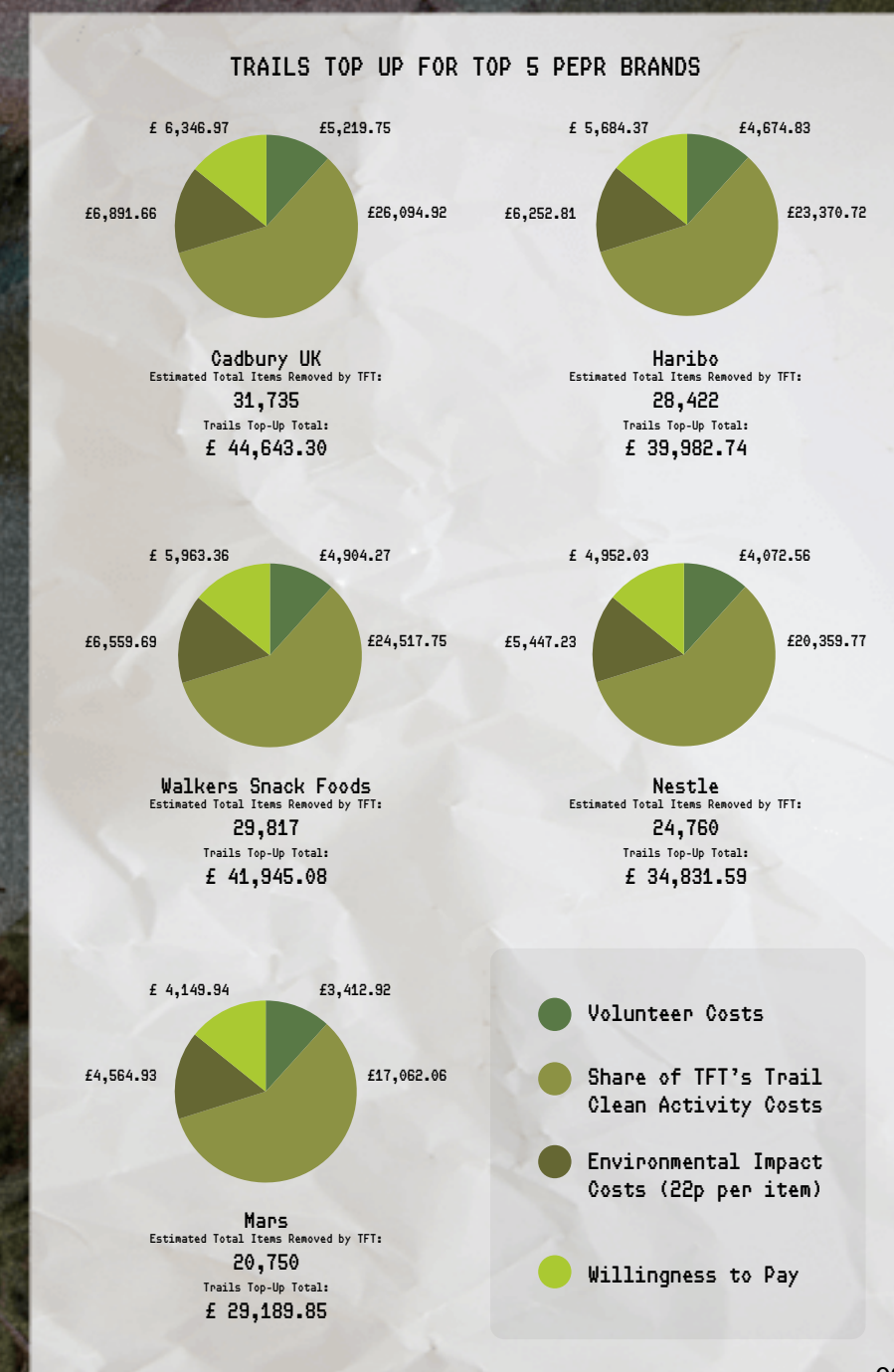
OWNING Y(OUR) SH*T

PART 3

Part Three: Owning Y(our) Sh*t

In 2023, our State of Our Trails Report called for Shared Responsibility as we work towards a Trash Free Future. We wanted to see producers of packaging pollution that we find on our trails formally acknowledge a shared moral responsibility for single-use pollution alongside their consumers.

Core to realising this vision of shared responsibility is pEPR. It's as much a win for producers seeking to capture the attention of conscious consumers as it is for policy makers and consumers. But given the current legislation doesn't yet resource those protecting recreational trails from SUP, we've kindly calculated this cost for the five brands we find most often (out of the 157 brands our volunteers have identified) and sent them their own personalised invoice.



Using our Trash Survey and Brand Audit sample we've calculated the number of items our community has removed in the last six years, and how much these items are valued at under pEPR based on their material. Given the current material fee calculations don't take into account costs incurred by non-LAs, we have included our own.

Though our volunteers are diligent surveyors of trash, only a small proportion of branded items are identifiable due to the breakdown of packaging pollution. The reality is the figures here should be far higher, but without stronger guidelines from government that enforce more traceability, accountability remains blurred.

Is a Trails Top-Up too much to ask?

We're by no means denying that our 'Trails Top-Up' fee is significant, and we haven't sent these invoices lightly, without awareness of the costs facing UK producers in the wider economic climate, or without having done further research. These five brands had a cumulative profit of over £10 billion between 2023 - 2024. Other than Mars, whose 'Mars

Sustainability Investment Fund' was announced in July of this year, we couldn't find any public information on how much money, if any, these brands have put into UK-based environmental causes or organisations.

On the flip side, their marketing budgets alone far outweigh the amount we are invoicing for - Cadbury UK alone spent £100 million on national advertisement in 2024. By comparison, the cost of our Trails Top-Up is a drop in the ocean, yet it could transform our ability to protect recreational trails, enhancing them for ecological and public benefit.

Additionally, we've added in a 'Willingness to Pay' fee to our producer invoices. Research undertaken by DEFRA found that the UK public would be willing to pay approximately £57 a year per household to see cleaner communities. We believe packaging producers should be just as willing as their customers, so we've translated this into a per-item cost.

It's important to note the figures above are based solely on the single-use pollution Trash Free Trails volunteers have removed and recorded so far. Our research suggests there could be 4.7 million items of pEPR-relevant single-use pollution on UK PRoW right now. That's a lot of chocolate bar wrappers and crisp packets - and a much heftier invoice.

It's Our Sh*t Too

Fundamentally, pEPR ensures that the brands profiting from single-use products pay their fair share of the real costs of managing the product's entire journey, even after its intended use. We stand by this principle wholeheartedly, but we also recognise this should not be their burden alone - we, as individuals, are also responsible for how we use and dispose of the single-use products we consume.

pEPR isn't a free pass for us as consumers and tax payers - it means owning our sh*t too. Understanding how and why single-use pollution finds its way onto our trails remains central to our work, as does our role in preventing it. Achieving truly Trash Free Trails requires a renewed connection with nature on an individual, community and society-wide level - with this we will grow a deeper sense of collective care and responsibility to the environments we spend time in.

With this Report, we celebrate a rebalancing of responsibility, while acknowledging we as individuals have work to do too - together - to create a society that champions our trails and the wild places they take us to.



TAKING pEPR TO THE TRAILS (RECOMMENDATIONS)

PART

Part Four:
Taking pEPR to the Trails
(Recommendations)

4

Recommendations

Six years of data shows the vast numbers of single-use pollution on our trails, teaching us the damage it causes and ultimately highlighting a grave oversight in this policy. This is not only in the shape of missing funding for DEFRA, PackUK and local authorities, but also in the direct consequences for animals, plant life and to the communities who ride, run and roam on recreational trails.

By ignoring this oversight, how will we ever protect these spaces which are so vital?

With that in mind, we've outlined a series of recommendations - tangible actions for policy makers, producers and volunteers alike - to help us enhance and evolve pEPR to be a world-leading legislation framework that promotes circularity, innovation, and most importantly, protection of our wild places.

For DEFRA and PackUK

- Add an amendment to the legislation that incorporates a Trails Top Up ; further fees towards covering the impact of ground litter in independently managed green spaces.
- Make a portion of funds raised available for everyone bearing the costs: land managers, NGOs, community groups and volunteers.
- Formally recognise the role of eNGOs (like us) in:
 - Delivering robust single-use pollution monitoring programmes to support national litter analysis and pEPR payment calculations.
 - Providing community and educational programmes that remove existing single-use pollution and prevent future packaging leakage.

To Brands

- For now, pay the invoices we send, and consider donating to other NGOs, volunteer groups and local clean-up initiatives fighting to protect and enhance all ecosystems.
- Set time-bound reduction targets for in-scope SUP.

- Alongside EPR-relevant packaging reports, publish insights into 'leakage risk and impact', so we can work together to meaningfully attend to the problem of branded SUP.
- Swap to 'less-leaky' formats and champion innovation in packaging material and design.

To Volunteers

- Send this Report to a brand you love (or loathe!), and ask them to make the Trails Top-Up pledge.
- Send this Report to your local MP, MS, MSP and/or MLA, highlighting the local green spaces you care about and advocating for the Trails Top Up to be incorporated into EPR regulations.
- Continue to submit Trash Surveys and help contribute to the most detailed picture of trail pollution in the world.

CONCLUSION: SO WHAT NOW?

Extended Producer Responsibility is built on a simple concept: the polluter pays. But responsibility doesn't end with producers and pEPR isn't a cue for us to pack up our pickers and move on. Despite our and countless other organisations and volunteers' efforts, single-use pollution is on the rise - and that isn't because we're picking it up less.

Unsurprisingly, there is a direct correlation between single-use packaging production and pollution. Here in the UK, pEPR will go some way to creating more recyclable packaging and better equipping local authorities to deal with what's left, but it does nothing to tackle the speed and scale at which plastics in particular are being produced.

We stand by our call for a binding UN Global Plastics Treaty which addresses the full lifecycle of single-use products and halts the exponential growth of virgin plastic production since the 1950s. We must turn off the tap, and together find ways to finally reduce our reliance on single-use products.

Beyond policy, there is still a deep, cross societal disconnection from nature. Building a shared understanding about why single-use pollution leaks onto our trails, and how to stop it is just as vital as removing it.

So, as policy begins to reduce what's left behind, we'll still need people - riders, runners, roamers and nature lovers to work together to help these places flourish. Because every time we host a trail clean, every time a young person engages with the issue for the first time, every moment of connection, we move towards lasting change, to a future where our trails are totally free from single-use pollution.

Over the next five years we'll be continuing to advocate for the development of policies like pEPR that have direct, tangible benefits for our trails. We'll also turn our attention, more than ever before, to what we believe is the root causes of the 'litter problem', and the potential of trail cleaning to address it; quite literally, how meaningful is the act of removing single-use pollution from a place you love?

WE CAN'T WAIT TO FIND OUT.

ACKNOWLEDGEMENTS

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SPECIAL THANKS TO THE TRASH
FREE TRAILS TEAM AND A-TEAM
AMBASSADORS

THIS REPORT WOULD NOT BE
POSSIBLE WITHOUT THE SUPPORT
OF OUR STATE OF OUR TRAILS
RESEARCH PROGRAMME PARTNERS:



OUR WORKINGS

OUR DATA IS VOLUNTEER-DRIVEN; AS SUCH WE BELIEVE WE SHOULD MAKE THE PROCESS OF OUR ANALYSIS AS TRANSPARENT AS POSSIBLE - SO THAT ANYONE, ANYWHERE, CAN SEE THE POWER OF CITIZEN SCIENCE.

HEAD TO OUR WEBSITE TO SEE OUR WORKINGS FOR THIS REPORT:

[HTTPS://WWW.TRASHFREETRAILS.ORG/STATE-OF-OUR-TRAILS-REPORT](https://www.trashfreetrails.org/state-of-our-trails-report)

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