

NOMOREBUTTS

RESPONSE TO THE
DRAFT CONSULTATION
FOR THE DEVELOPMENT OF THE NEXT
NATIONAL TOBACCO STRATEGY

March 2022



Executive Summary

Cigarette butts are the most littered item in Australia¹.

Most recent estimates suggest that up to 8.9 billion cigarette butts are littered into the Australian environment every year². With a plastic filter made from cellulose acetate, cigarette butts are not biodegradable. The filter contains toxic chemicals that leach into the environment, causing significant damage.

With over 7,000 chemicals³ and the view that each butt can contaminate up to 40 litres of water⁴, and have been proven to kill fish in as little as one litre,⁵ the environmental impacts of littering alone are substantial. Tobacco producer, Philip Morris International, states on their materials that it can take up to 15 years for a cigarette butt to break down⁶. During this process, thousands of plastic micro fibres are created, and hundreds of litres of water are polluted.

Further environmental devastation is caused by the hundreds of fires attributed to cigarettes each year⁷.

As a product available in all Australian states and territories, and with momentum of stewardship programs being implemented around the world, it is time for cigarette butts to receive the attention necessary in Australia to enable positive impacts to our environment.

With the costs attached to infrastructure, awareness, and clean ups currently shouldered by taxpayers and government bodies, the consideration of shifting this financial accountability towards the producers is well overdue.

If 1% of the 2022-23 projected revenue from tobacco was set aside from the federal budget, an initial fund of more than \$130 million⁸ would enable significant and swift action of stewardship initiatives in a coordinated, national approach. This would pave the way for producer responsibility in future budgets.

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Purpose of this Document

This document offers comprehensive evidence to be considered as part of the final consultation to help develop the next Australian National Tobacco Strategy.

It is prepared as an extended response to the online survey, “National Tobacco Strategy 2022-2030”, as promoted by the Australian Government Department of Health in February 2022.

Further, this document can be considered as a resource for the Commonwealth Government and related departments, including DAWE to further understand the issue of cigarette butt litter, as well as the status of stewardship initiatives overseas.

The information contained in this document is the result of research conducted by No More Butts during the course of fulfilling their charitable purpose: the protection of the natural environment. The results and findings are based upon No More Butts’ professional judgment, experience and expertise, based upon the reliance of the research and information used to prepare this report.

Further research links have been included in the Appendix. They have not, however, been cited in the responses to the formal questions as this was initially prepared to submit online.



Plastic cigarette filters continue to be the most littered item individually in Australia

A butt free environment

Tobacco filters are the most littered item in Australia. Made from a plastic (cellulose acetate) filter, they can exist in nature for up to 15 years, and are not biodegradable.


With thousands of trace elements of toxic chemicals and heavy metals, when a cigarette butt is littered into the environment, it can have devastating impact on soil, vegetation, animals, water quality and marine life.

Up to 3,500 tonnes of plastic waste tobacco filters are generated from the estimated 17.8 billion cigarettes consumed in Australia annually. Any reduction of this amount up to half of this entering our environment, there is an impact our marine life with less threat of ingesting micro plastics. On land, it would enable better soil quality and allow the regeneration of flora.

Whilst removal of plastics from tobacco filters would be the primary recommendation, we would support alternative measures under a regulated product stewardship scheme. Voluntary schemes have not proven effective to date in any country.

No More Butts is tackling cigarette butt litter. Our vision is for a 'butt free environment'.

SECTION 1



**RESPONSE TO
ONLINE SURVEY**

NOMOREBUTTS

Do you agree with the goals and smoking prevalence targets for the draft NTS 2022-2030? Please provide an explanation for your selection.

Agree.

However, No More Butts believes any National Tobacco Strategy should also include litter reduction targets.

At a minimum, there should be a comment in the summary that highlights the positive environmental impact that a reduction in smoking will ultimately have.

Do you agree with the objectives for the draft NTS 2022-2030? Please provide an explanation for your selection.

Agree.

However, No More Butts believes building awareness of the impact to the environment should be included in the overall objectives.

In the introduction, the environment is referred to being an associated cost of tobacco use, however there are no activities listed that go reducing this impact.

At a minimum, awareness of environmental impacts should be integrated into programs designed around health impacts and reasons to quit.

No More Butts would encourage the addition of the following objective:

- Protect and restore the environment through the reduction in consumption of tobacco products, resulting in reductions of deforestation, carbon emissions, landfill rates, littering rates, marine debris, and water and soil quality.

Do you agree with the guiding principles for the draft NTS 2022-2030? Please provide an explanation for your selection.

Agree.

No More Butts supports any initiatives that include expectations and resulting penalties for wholesalers, sponsors and retailers regarding the reporting of importation and retail sales. This should be at a granular level of registered premise. This information will help inform policy and help build targeted awareness programs, as well as support reductions in illicit tobacco trading.

This information should be available across government departments and NGOs to help support product stewardship initiatives and extended producer responsibility schemes to ensure tobacco companies are responsible for paying for the litter and waste that they generate through their sales.

Do you agree with the priority areas for the draft NTS 2022-2030? Please provide an explanation for your selection.

Agree.

However, No More Butts would like to highlight that whilst these priority areas are thorough and will have positive impact on a Health perspective, it is not all-encompassing as it does not include specific effects of the tobacco industry on the Australian environment.

As such, No More Butts would encourage a specific priority for the environment:

Provide greater protection to our natural environment via specific actions designed to impact reduction in littering rates and move the related costs to producers.

Do you agree with the actions listed under each priority area for the draft NTS 2022-2030? Please provide an explanation for your section.

Agree.

Whilst No More Butts does agree that the actions listed under each priority area are great from a Health perspective, there is no activity that goes towards reducing the environmental impact of tobacco in Australia.

No More Butts proposes the following additional actions under each Priority Area:

Priority Area 1

- Raise awareness of the environmental impacts of tobacco products and support the implementation of schemes from state and federal government environment departments and relevant NGOs.

Responsibility: Australian government, state and territory governments, NGOs

Priority Area 2

- Include information around the environmental impact of smoking and littering tobacco products in awareness campaigns, information leaflets and smoker surveys.

Responsibility: Australian government, NGOs

Priority Area 3

- Complement tobacco excise increases with litter abatement tax at retail to be directed into covering the cost of infrastructure, programs and clean up efforts in a user pays system

Responsibility: Australian, state and territory and local governments, NGOs

Priority Area 4

- Build awareness of the impacts of tobacco related litter amongst Aboriginal and Torres Strait Islander People, using their strong connection and custody of land and sea.

Responsibility: Australian Government, state and territory governments, Aboriginal community-controlled organisations

Priority Area 5

- Build in awareness of the impact to the environment into programs targeted to groups that are at a higher risk of tobacco consumption, who also have a higher propensity to litter.

Responsibility: Australian Government, state and territory governments, NGOs

Priority Area 6

- Introduce labelling on the cigarette packet that highlights the impact of litter on the environment.

Responsibility: Australian Government, retailers

Priority Area 7

- Consider alternative options for plastic cigarette filters, including the potential removal of them all together.

Responsibility: Australian Government

Priority Area 8

- Mandate availability of portable ash trays at all points of purchase.

Responsibility: Australian Government, retailers

Priority Area 9

- Introduce a return scheme for vaping devices at registered locations to ensure a new stream of litter and waste is managed.

Responsibility: Australian, state and territory governments, retailers

Priority Area 10

- Standardise smoking exclusion zones nationally and ensure adequate infrastructure near these exclusion zones

Responsibility: Australian, state and territory and local governments

- Introduce fines for businesses that are identified as having litter within the exclusion zone, or within the boundaries of their site / business location.

Responsibility: Australian, state and territory and local governments, industry

Priority Area 11

- Include information around the environmental impacts of tobacco products in all discussions with smokers and working groups

Responsibility: Australian, state and territory and local governments, NGOs

SECTION 2

ENVIRONMENTAL IMPACT

OF

TOBACCO IN AUSTRALIA

NOMOREBUTTS

Tobacco filters

A cigarette butt is defined as the part of the cigarette thrown away after the smoker has finished smoking it (Collins English Dictionary definition). The filter is made of cellulose acetate, a non-biodegradable plastic.

Cellulose acetate refers to any acetate ester of cellulose, usually cellulose diacetate. A bioplastic, cellulose acetate is used as a film base in photography, as a component in some coatings, and as a frame material for eyeglasses; it is also used as a synthetic fiber in the manufacture of cigarette filters and playing cards.

The cellulose acetate tow fibers are thinner than sewing thread, white, and packed tightly together to create a filter; they can look like cotton.

Other materials have been tried and rejected in favor of the taste that acetate produces. Filters vary in filtration efficiency, depending on whether the cigarette is to be "light" or regular.

The following is quoted from a research paper by researchers from the New York State Department of Health, the Roswell Park Cancer Institute, and Cornell University.

"Viewing the white face of the cigarette filter with the naked eye and compression of the filter column with the fingers would suggest that the filter is made of a sponge-like material. However, opening the cigarette filter, by cutting it lengthwise with a razor, reveals that it consists of a fibrous mass. Spreading apart the matrix reveals some of the more than 12 000 white fibers. Microscopically, these fibers are Y shaped and contain the delustrant titanium dioxide. The fibers are made of cellulose acetate, a synthetic plastic-like substance used commonly for photographic films. A plasticiser, triacetin (glycerol triacetate), is applied to bond the fibers."

Environmental impacts of tobacco filters

Plastic

When cigarette butts are littered into the environment, they can remain there for up to 15 years. Cellulose acetate is photodegradable, meaning elements such as sunlight are required to break down. Being made from fibrous plastic, thousands of strands of plastic micro fibres enter the environment during this journey.

It has not been proven that the filters provide any health benefits to smokers.

Despite a minor reduction in smoking percentages, population increase suggests that the absolute number of smokers (and therefore resulting litter) is expected to continue without national, coordinated intervention.

Toxic chemicals

Cigarettes are reported to contain up to 7,000 chemicals, including 250 that are known to be harmful. These include hydrogen cyanide, carbon monoxide, and ammonia, which are known independently to be hazardous chemicals.

This ultimately means that chemicals are absorbed into the filter. When littered, the chemicals begin leaching into the surrounding environment. In water, this has been shown to impact up to 40 litres per cigarette butt.

Fires

When a lit cigarette is littered, they can contribute to fires. This can have devastating impacts on communities and nature and can result in further impact to our valuable ecosystem.

Other impacts

In addition to the reported adverse impacts of deforestation, and health issues related to tobacco farming and carbon emissions prior to departure from their manufacturing origin, there is a carbon impact related to the logistics - including freight to and within the Australia, and storage.



Cigarette butts are often mistaken for food by animals and marine life.

(Karen Mason/Facebook)

The financial costs of managing waste tobacco filters

In Australia, research commissioned by WWF in 2021 shows \$71m would be required to tackle the (up to) 8.9 billion cigarette butts littered each year. This is similar to estimates from R. Tait in 2019 of a cost of 73m AUD. Based on estimated sales data, this would be 0.004 per cigarette sold.

However, this only takes into account the clean-up costs, not other initiatives.

Costs from funding community clean-up events to proportion of total waste management costs of a local government area can all be attributed to managing tobacco filters. Further, project management resources, percentage of emissions from landfill should also be considered.

The City of San Francisco implemented a \$1 litter abatement tax for all retail sales, which has increased to 1.05 USD from 1st January 2022. On the assumption that this is based on 25 cigarettes in a packet, you could assume 0.04-5 USD per cigarette stick sold.

SECTION 3

CONSIDERATIONS

AND

OPPORTUNITIES

NOMOREBUTTS

Terminology

In this document, No More Butts makes some certain assumptions, but due to inconsistencies in data sources unfortunately cannot make representations of scientific fact.

There are inconsistent terms used across industry and environmental organisations in relation to the materials and the process of degradation after being littered. It is reported that they are photodegradable, which means they will decompose by the action of light, specifically sunlight. However, there are suggestions that cigarette butt filters are a bioplastic and therefore are technically biodegradable, despite not meeting global standards.

Further, there are often opposing view on whether a cigarette butt breaks up, or down. Similarly, there are questions whether or not it is already a micro plastic or creates thousands of micro plastics as the cigarette butt filter degrades over time.

There is a large discrepancy in the time that a cigarette butt will take to photodegrade. Naturally, exposure to light and other elements may vary the lifecycle. The most common length used, even by Philip Morris, is 15 years, however environmental organisations, such as Clean Up Australia have reported as short a time as 5 years.

Generally, environmental organisations seem to promote the most sensationalist figure without a strong scientific basis.

From a government perspective, cigarette butt filters haven't been included in the definition of waste plastic, or mixed plastic, so have been excluded from activities leveraging the Recycling Modernisation Fund.

It is imperative that Terms and Definitions are agreed on to use as a base for any Tobacco Industry Product Stewardship Schemes in the future.

Data and reporting

There are multiple data platforms that exist and are in use by various organisations and contracted companies. These platforms are often basic, stored locally and are not integrated with each other. Much of this data runs the risk of being duplicated as eager citizen scientists report their audits and collections across multiple platforms.

Without a governance model in place, citizen scientist reports may not be viable. Similarly, some groups may rely on this data to enable continued access to grants, with information derived from reports of volume of litter collected or volunteer hours contributed, without formal oversight and approval from government departments.

Councils generally do not make provision for data collection, so there's no way to know how many cigarette butts are being collected weekly, what the trend is and more importantly the true cost to address the issue.

No More Butts is supportive of the implementation of a national framework for data collection, including the methodology and believes there should be a consistent taxonomy for all litter items across all data platforms. Similarly, users should be required to agree to Terms and Conditions around multiple entries and false reports.

Programs to protect the environment

Campaigns aimed at promoting responsible disposal

National awareness campaigns are critical to allow smokers and non-smokers the opportunity to learn about the impacts of their littering behaviour - on the environment around them.

Local Area Marketing / BTL marketing will be more effective with a national ATL campaign (TVC, Billboard, Newspaper, Digital, Radio).

Provision of bins and management of binned filters

Any awareness program needs to be complemented by adequate quantities of fit-for-purpose infrastructure. In general, smokers won't make the effort to go more than 5 to 10 metres out of their way to bin their cigarette butt after consumption.

The answer is not necessarily doubling the quantity bins, but ensuring dedicated bins are visible and located in line with hotspots that are associated with frequent smokers and littering.

There is an argument for the dedicated infrastructure being made within the country, rather than imported from overseas.

Clearing up ground litter and subsequent treatment

Community clean up events and cost of local government and council waste collection and disposal can be estimated and proportionately allocated based on population and/or smoking rates within the locale. Further data gathering can lead towards this allocation of funding.

Not much consideration has been drawn towards remediation of soil and vegetation from known hot-spots, which should also be a part of a 360 degree program.

Data gathering and reporting

Ensuring a nationally consistent reporting methodology and litter taxonomy is an important step towards creating a valid baseline to measure future success and metrics from.

Registration and accreditation of users will be important, to ensure integrity of data collection.

Also, data on bin fill rates should be implemented if dedicated infrastructure is provided. This should be overlaid with litter audits within the proximity of the infrastructure to generate a complete picture.

Overlaying importation and retail sales data is also a critical component to effectively measure littering rates as a percentage of consumption and purchase behaviour.

Additionally, Design for Environment (alternative materials), Recycling (upcycling, return schemes)

Additional activities to charge to tobacco companies:

- Progressing research into alternative filter materials
- Progressing research into the use of tobacco filters
- Funding of set up and operation of return schemes

Other regulatory approaches to consider

The key consideration if plastic tobacco filters continue to be sold in Australia will be how to take coordinated and regulated action on the reduction of littering.

If banning plastic tobacco filters is not an immediate option, then implementing a cross-sectorial, regulated product stewardship scheme for all tobacco products will be critical to progress initiatives to ensure the adequate protection of the environment moving forward.

An effective product stewardship scheme will enable positive environmental outcomes. There is expected to be a halo effect on smoking reduction rates, which will ultimately provide health benefits to the smoking population, as well as reducing second-hand and third-hand smoke.

Without a formal scheme in place, the current non-accredited, voluntary industry scheme will remain ineffective.

Additional regulatory approaches that could exist under a TIPSS, or independently should include:

- Mandating that tobacco packaging highlights the plastic in the filter
- Smoking bans in public places
- Implementation of Designated Smoking Areas
- Enforcement of littering and smoking laws
- Empowerment of more officers, including parking inspectors, to implement fines
- Implementation of smoke-free zones and designated smoking areas
- Implementation of 'smoke-safe' permits for building and construction sites
- Implementation of standards for dedicated infrastructure

Product stewardship

A Tobacco Industry Product Stewardship Scheme and could cover the following items:

Design and deploy a national smokers survey, to understand behavioural triggers, awareness of cigarette contents and environmental impacts (behavioural)

National and local awareness campaigns on the contents of cigarette butt filters and the impact to the environment

Dedicated and adequate, infrastructure; and

Programs to enable diversion from landfill; and

Scaling abilities for the re-use of plastic cigarette butt filters

Research into alternative materials for cigarette butt filters - Design for Environment (DfE)

Availability of recyclable 'butt pockets' at all points of purchase

Inclusion of a recycled and re-usable 'butt pocket' at the tobacco company factory to ensure 100% coverage of a solution for smokers

Investigation into IoT and AI for data collection within infrastructure

Research funding via grants to advance research into recycling methods and uses for recycled products

National and global support for action

The Australian Government has set an action to tackle cigarette butt litter as part of their National Plastics Plan.

Separately at a state level in Australia, the NSW Government has already targeted an Extended Producer Responsibility scheme for cigarette butts in their Plastic Action Plan. With the recent passing of their Plastics Reduction and Circular Economy Bill 2021, they now have the ability to implement Product Stewardship measures for tobacco companies.

The Queensland and South Australian governments are also considering which additional single use plastics that they should ban next.

No More Butts has sourced Letters of Support from Australian based environmental organisations and NGOs, local government bodies, as well as waste and recycling industry businesses and research partners for cigarette butts as part of a nomination for tobacco filter to be included under the Minister's Priority List for products to be considered for Product Stewardship. These are included in this document in Appendix 1.

Tobacco company, Philip Morris, states on their international website that their objective is a 50% reduction in plastic litter of their products by 2025. A removal of filters, or a reduction in litter, would enable this target.

In addition to initiatives taking place around the world, this level of support gives No More Butts significant confidence that all relevant stakeholders are ready to deliver the outcomes planned as part of an implementation of a ban in plastic filters or an overall product stewardship scheme.

Global examples

Around the world, there is growing momentum for product stewardship and extended producer responsibility schemes for cigarette butts and tobacco products.

Across Europe, as well as in California, The Netherlands, and Canada, programs of varying degrees are already being implemented. New Zealand announced their Smokefree Aotearoa 2025 Action Plan on 9th December 2021.

The EU has recently implemented a “filter contains plastic” label on sales of all cigarette packets, helping to increase awareness of the potential impact of the smokers’ decision to litter their butt after finishing their cigarette.

San Francisco has a history of collecting litter taxes from retailers, along with charging tobacco companies for the cost of cleaning up.

In Canada, social enterprise, TerraCycle, has implemented a refund scheme to encourage smokers and the community to return their cigarette butts. With strong examples of CDS implementations across Australian states, this should be a strong consideration.

Most initiatives are legislated by Government and implemented by NGOs, with limited leadership and support from Tobacco companies.

Under the WHO FCTC, there are potential restrictions for the Commonwealth Government to engage with Tobacco collaboratively on projects. No More Butts should be considered as a strong option to lead the design and implementation of programs.



In Europe, from July 2021, where a cigarette has plastic in the filter, the package must clearly include a disclaimer that the product contains plastic, in a harmonised approach to other single use plastics that weren't part of the immediate ban.

Resource recovery opportunities

As cigarette butt filters are made of plastic, this creates opportunities for the recycling, or upcycling, of cigarette butts. A global social enterprise already has a commercially scaled model based in America. There they process the cellulose to a stage where it can be sold as a low-grade plastic pellet, which can be used in the creation of new plastic materials, such as park benches and ashtrays.

RMIT in Australia has over 15 years of research to consider shredded cigarette butts as a composite material in clay-fired bricks. More recently, No More Butts has engaged a mycologist to investigate using a trained species of oyster mushrooms to break down the cellulose in the filters and assist to remove some of the toxins.

Further, for a grant application, No More Butts has previously received an endorsement from a large Australian construction supply company to trial cigarette butts within concreting projects, such as bus stops, asphalt and pavements. No More Butts has also been engaging with research institutes on using cigarette butts, along with other problematic items, as a composite in other construction materials.

There is also provisional research on using activated carbons from cigarettes butts in CO2 capture, uranium removal, and soil remediation (biochar).

Alternatives to cellulose acetate tobacco filters

A major consideration is Design for Environment (DfE). Should energy and resource be put into identifying biodegradable filters? There are two examples from India and Canada where different filter types have been trialed. However, if there is not adequate awareness and infrastructure, changing the material will still result in toxic litter, even though they may not exist in nature for as long.

Filter-less cigarettes

Filter-less cigarettes are an option worth considering. It has not been proven that the filters provide any health benefits to smokers.

Reusable filters

A smoker could purchase a mouthpiece (made of metal, wood, bamboo, or even plastic), which includes the provision for a multi-use filter. The mouthpiece would then be inserted into the filter-less cigarette stick. It is estimated to get 7 – 20 uses before this filter would need replacing. Whilst there would still be toxic chemicals, the attachment to a multi-use product would see less littering of the product.

Biodegradable filters

Whilst a biodegradable filter would not persist in nature for as long and would be unlikely to cause as much impact, having a chemical-containing filter would still leach toxins into the environment if it was littered at the same rate. Arguably, if people knew it was biodegradable, they may actually litter even more.

The Tobacco industry is openly focused on a smoke-free future, so R&D funds are being spent on products such as e-cigarettes. Australian tobacco companies have advised that nothing exists at scale that could be implemented as an alternative to plastic filters.

SECTION 4



THE PROPONENT

NOMOREBUTTS

Proponent

Founded in June 2020 under the original entity name, NO BUTTS ABOUT IT (INTERNATIONAL) LTD, No More Butts is a registered Australian charity, entered into the Register of Environmental Organisations in December 2020.

In August 2020, No More Butts made a submission to the Australian Commonwealth Government for the New Product Stewardship Investment Fund for cigarettes. Since then, No More Butts has continued to work extensively across industry, environmental groups, peak bodies, and Commonwealth, State and Local government departments to build a strong network in Australia.

In December 2020, No More Butts consulted to Equilibrium in their preparation of the report commissioned by WWF regarding cigarette butt litter, which has just been released in November 2021. In June of 2021, NSW EPA contracted No More Butts to consult on this topic, helping to prepare monitoring and evaluation framework and provide guidance for future programs.

Based on an abstract submission, No More Butts were invited to present on the considerations and proposed framework for a national Product Stewardship Scheme for cigarettes at KAB NSW Litter Congress in April at UTS in Sydney, with their presentation titled “Igniting a new scheme: Addressing our most littered item - cigarette butts”. Following this presentation, No More Butts were guests on the Ocean Protect and Banish podcasts to talk about the issue. This was followed up by another speaking engagement at Waste and Recycle Conference 2021.

No More Butts has engaged with the Commonwealth Plastics Plan team across 2021 around different actions in the March plan, including the creation of a national framework for litter reporting.

No More Butts has continually engaged with the leadership team of the Product Stewardship Centre of Excellence and has also engaged with the offices of the Federal Minister and the Assistant Minister for the Environment to discuss potential actions and considerations to address this waste problem.

More recently, No More Butts has deployed programs in Wollongong (NSW) and across Perth (Western Australia) to bring solutions to LGAs.

With a board containing a former senior Microsoft executive, and a Director of an Australian manufacturing and retail brand, No More Butts bring the experience required to deliver this project for the Australian Government. As a company limited by guarantee, it is run by volunteers based across Australia and has members across the world.

Our Vision

“A butt free environment”.

We see a future where cigarette butts will be recycled, with the products created having a further positive impact on the community.

Our Mission

We run national awareness campaigns on the impact of littering and recycling options, with the aim to make people think twice before carelessly discarding their butts.

We assist in the beautification and regeneration of our natural environment through participation in, or coordination of, clean-up events.

We intend to scale national recycling programs and research alternative solutions whilst challenging industry to identify more environmentally friendly materials for cigarette butt filters.

Our Approach

Re-educate - We re-educate people, businesses, governments and organisations on the importance of the correct disposal, options for awareness programs and infrastructure, and on the ability to recycle.

Retrieve - We retrieve cigarette butts where they have been discarded, promoting the preservation and recovery of the natural environment. We partner with groups and run our own events.

Recycle - We promote existing recycling options and intend to scale these into as many communities and workplaces as possible.

Research – We work across research foundations and engage industry to identify alternative recycling methods, commercialise products made from the recycled materials, and progress research into alternative materials for filters.

Reward - We plan to pilot rewards schemes, with support from companies and governments, to drive a step-change in awareness and mindset.

Governance

Structure

NO MORE BUTTS LTD is an Australian based charity, as a public company, limited by guarantee.

The No More Butts Public Fund has been granted Deductible Gift Recipient status in Australia, and as such, all donors are entitled to a tax receipt and a full tax deduction for their donations.

Policies

The Board works with a number of Policies, which provide a framework for the corporate governance of NO MORE BUTTS LTD.

All Directors are required upon appointment to disclose any conflict of interest and must complete a Declaration for Responsible Persons, confirming that they are not disqualified under Governance Standard 4 to hold a Director position on the Board.

Membership

In order to be entered and retained on the Register of Environmental Organisations (REO), No More Butts conducted a recruitment drive in the first year of our operation.

Using our website, along with organic Facebook, LinkedIn, and Instagram marketing, we reached and retained the requirement of a minimum of 50 members.

As a public company, limited by guarantee, our members have a financial obligation to the company. This obligation can either be fulfilled up front, or if ever called upon. In our constitution, we resolved to have this membership fee at \$10.

There is currently no separation of obligations or entitlements for members who have already contributed their obligation.

We are required to submit a annual report to retain our REO status, confirming the current level of membership. This was completed after the Annual General Meeting, where a motion was passed to change the name of the legal entity from NO BUTTS ABOUT IT (INTERNATIONAL) LTD to NO MORE BUTTS LTD.

Memberships



One planet
handle with care

Alignment with United Nations SDGs



Our Values



Respect

“We respect the natural environment and we respect the diverse backgrounds and opinions of those involved in our charitable purpose.”



Preserve

“We preserve the natural environment by supporting activities related to sustainable litter and waste management along with clean-up events.”



Question

“We question and challenge how things have been done and how innovation can lead towards the best outcomes for the environment and our charity.”



Grow

“We seek opportunities to support the personal and professional growth of our team. We identify opportunities for funding to help our charity grow.”

APPENDIX 1



LETTERS OF SUPPORT

NOMOREBUTTS

Index of Letters of Support Index

These Letters of Support were written for the Australian Commonwealth Product Stewardship Priority List nominations in December 2021.

Whilst we are confident that these groups still support initiatives in Australia and abroad and therefore this nomination, the inclusion of these letters should not be considered as a specific endorsement by them for tobacco filters to be considered for future policy making in Australia.

- NSW Government - Department of Planning, Industry & Environment
- Melbourne Waste & Resource Recovery Group
- Keep Australia Beautiful Council (WA)
- Equilibrium consulting
- RMIT
- Seabin™
- Byron Shire Council
- Cairns Regional Council
- Wollongong City Council
- Let's Do It World (Australia)
- Boomerang Alliance
- Sea Shepherd



Our ref: EF21/18642

By email: shannon@nomorebutts.org

16 December 2021

To Whom It May Concern,

Subject: LETTER OF SUPPORT - PRODUCT STEWARDSHIP PRIORITY PRODUCT LIST

I refer to the nomination made by No More Butts to add cigarette butts to the Australian Minister for the Environment's product stewardship priority product list in accordance with the Recycling and Waste Reduction Act 2020.

The NSW Government is committed to product stewardship and recognises the impact of cigarette butt litter on the environment and economy.

The NSW Government recently passed the *Plastic Reduction and Circular Economy Act 2021* (the Act). The Act will give effect to the Government's commitment to prohibit problematic or unnecessary plastic items, set design standards for certain items and establish mandatory product stewardship requirements for brand owners of regulated products.

As you may be aware, the NSW Government released the NSW Plastics Action Plan in June 2021. The Plan includes a commitment to investigating an Extended Producer Responsibility (EPR) scheme that will make brand owners of tobacco products take responsibility for the litter impacts of their products. This commitment recognises that cigarette butts are highly littered in NSW and brand owners are not currently required to take action to prevent cigarette butts being littered or pay for the cost of cleaning up the litter.

The passage of the Act is the first step towards meeting this commitment. The Act establishes a product stewardship framework where brand owners of products prescribed by regulations to be 'regulated products' will be required to meet mandatory product stewardship targets or requirements. This may include targets such as the recovery of products at the end of their life.

The Act also has the power to require brand owners to hold an approved Action Plan before a regulated product is supplied in or into NSW. Such an Action Plan will outline how the brand owner plans to meet their product stewardship targets. These plans will hold brand owners to account, while providing them the flexibility to meet their targets in a manner that suits their business model. Before product stewardship requirements are established for any industry, the Government will undertake extensive public and targeted consultation on the development of the requirements.

This letter provides our support for No More Butts' nomination to add cigarette butts to the Minister's product stewardship priority product list, and for a coordinated national product stewardship scheme.



Should an opportunity arise for a state government to contribute to the development of a national product stewardship for cigarette butts, I would be delighted to offer our expertise.

Should you require any further information, please contact Susan Read at susan.read@environment.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Emily Yip'.

Emily Yip

Director Circular Economy Policy and Markets

Climate Change and Sustainability Division

Environment, Energy and Science Group

8 December 2021

By email: shannon@nomorebutts.org

To Whom It May Concern,

RE: LETTER OF SUPPORT - PRODUCT STEWARDSHIP PRIORITY PRODUCT LIST

We refer to the nomination made by No More Butts to add cigarette butts to the Australian Minister for the Environment's product stewardship priority product list in accordance with the Recycling and Waste Reduction Act 2020.

Through our work in litter prevention and management with metropolitan Melbourne's 31 councils, we have found that cigarette butts are a common and problem litter item in our region. In the [Litter Hotspots Program](#) that we administered, we captured 179 tonnes of litter, including over 1.29 million cigarette butts. Cigarette butt litter contributes to the \$80 million per year cost of clean up services by Victorian councils.

The purpose of this letter is to confirm that we have no objection to No More Butts' recommendation of adding cigarette butts to the Minister's product stewardship priority product list, and for a coordinated national product stewardship scheme.

Should you require any further information of us, please contact Jess Hand at jess.hand@mwrrg.vic.gov.au.

Yours sincerely



Josephine Regel
Director Operations, Planning and People
Metropolitan Waste and Resource Recovery Group
ABN: 64 480 279 309



Keep Australia Beautiful Council (WA)

Prime House, 8 Davidson Terrace, Joondalup WA 6027

Postal Locked Bag 10, Joondalup DC 6919

T 6364 7210 E kabc@kabc.wa.gov.au

ABN 71 028 403 985

Our ref: KAB 254/21

Enquiries: Linda Thoresen

Phone: 6364 6642

Email: Linda.Thoresen@dwer.wa.gov.au

To Whom It May Concern

KEEP AUSTRALIA BEAUTIFUL COUNCIL SUPPORT FOR A NOMINATION BY NO MORE BUTTS TO THE MINISTER'S PRODUCT STEWARDSHIP PRIORITY PRODUCTS LIST

This letter supports the nomination made by No More Butts to add cigarette butts to the Minister's product stewardship priority product list.

As the most littered item in Australia, cigarette butts have a negative impact on our environment. Cigarettes are known to contain over 4,000 chemicals, most of which are trapped in the filter (butt) and littered into the environment where they pollute soil and water. A reduction in the amount of litter would have a positive impact on flora, fauna and marine life, as well as on soil quality. Research suggests that those who eat fish may be consuming microplastics, including the strands of cellulose from cigarette butts.

There is enormous cost to clean-ups for the community, local and state governments and businesses. Main Roads Western Australia estimates that it spends over \$6 million on roadside litter clean-ups. While litter in Western Australia has decreased over time, cigarette butts remain a stubborn 33 per cent of littered items, with the most prevalent counts being in industrial areas, along highways and on beaches. A strategic approach is now required to bolster behaviour change initiatives that are less effective with hard-to-reach sections of the community.

We believe that a coordinated national product stewardship scheme would enable the necessary strategic action to be taken. It is important to note that cigarette butts are toxic single-use plastics that are currently littered or end up in landfill. A product stewardship regime for cigarette butts would have a similar effect on litter as the container deposit systems that now operate across Australia, with the added benefit of a reduction in toxic materials poisoning flora and fauna. Reducing the cost of clean-ups may also result, as butts are time consuming to collect. Product stewardship also shifts the financial accountability from state and local governments and the community to producers.

In general, while we believe that a positive environmental impact is being achieved through the delivery of KABC's programs and those proposed by No More Butts around awareness, infrastructure and recycling initiatives, cigarette butts require a strong strategic approach for change to occur.

We endorse the nomination for cigarette butts to be added to the Minister's product stewardship priority product list.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Aspinall', written in a cursive style.

Michael Aspinall
Chairman
Keep Australia Beautiful Council

9 December 2021



sustainability performance reputation

14 December 2021

Shannon Mead

No More Butts

shannon@nomorebutts.org

Re: Priority product stewardship listing

Dear Shannon,

Equilibrium is writing to express support for you putting forward cigarette butts for consideration by the Australian Government for listing as a priority class of products for product stewardship.

Equilibrium was engaged by the WorldWide Fund for Nature Australia in 2021 to undertake an analysis of cigarette butt litter and to assess potential solutions to the environmental problem of cigarette filter and butt litter.

One of the fundamental observations and findings in that work is that cigarette butt littering and associated problems are persistent. In the absence of revised and refreshed approaches and solutions, the problem will continue.

The analysis Equilibrium conducted found that product stewardship interventions can have a positive effect.

Research and engagement for the project also identified that product stewardship and extended producer responsibility schemes are gaining momentum internationally including Europe, the USA and New Zealand. Such approaches are increasing global corporate and

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equil.com.au info@equil.com.au

Government use of product stewardship for efficient and effective environmental improvements.

Listing of cigarette butts as a priority for product stewardship may motivate revised and refreshed solutions and product stewardship interventions, and therefore be a positive step towards reducing the problems identified in this recent work and for using product stewardship as a tool to address the problems.

Yours sincerely



Nicholas Harford
Managing Director

29th November 2021

To Whom It May Concern:

This letter is to support the nomination made by No More Butts to add cigarette butts to the Minister's Product Stewardship Priority Product List.

RMIT has conducted over 10 years of research to re-purpose and recycle cigarette butts into bricks because we recognise the negative impact of cigarette butt litter on the environment.

We support the belief that a coordinated national product stewardship scheme would enable greater action to be taken.

- Reduction in littering of single use plastics
- Diversion of waste plastics from landfill
- Reduction in waste/mixed plastic being exported
- Opportunities for new materials to be used in a more circular fashion
- Consumer awareness of plastics in filters
- Reduction of related cleaning costs
- Shifting financial accountability from councils to producers
- Obvious health benefits from the reduction of smoking as a result of increased awareness

In general, we believe that a positive environmental impact can be achieved through the delivery of programs (such as those proposed by No More Butts) around awareness, infrastructure and recycling initiatives.

We endorse the nomination for cigarette butts to be added to the Ministers priority list. If you have any questions about this endorsement, please do not hesitate to contact the undersigned.

Yours sincerely,



Jie Li
Professor
B.Eng, M.Eng, PhD, MIEAust

Assistant Associate Dean - Civil and Infrastructure Engineering
School of Engineering
Tel: 03 9925 3554
Email: jie.li@rmit.edu.au

29th November 2021

To Whom It May Concern:

This letter is to support the nomination made by No More Butts to add cigarette butts to the Minister's product stewardship priority product list.

As the most littered item in Australia, cigarette butts have a negative impact on health and our environment:

- Cigarettes are known to contain over 4,000 chemicals, most of which are trapped in the filter (butt) and littered into the environment where they pollute soil and water
- Global programs exist for scaled recycling of cigarette butts
- A reduction in the amount of litter would have a positive impact on flora, fauna and marine life, as well as soil quality
- A reduction in smoking from increased awareness of the impacts to the environment would have health benefits for humans. There is also an assumption that those who eat fish may be consuming micro plastics, including the strands of cellulose from the filters

There is enormous cost to clean-up for local councils and businesses.

We believe that a coordinated national product stewardship scheme would enable greater action to be taken.

- Reduction in littering of single use plastics
- Diversion of waste plastics from landfill
- Reduction in waste/mixed plastic being exported
- Opportunities for new materials to be used in a more circular fashion
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- Obvious health benefits from the reduction of smoking as a result of increased awareness

In general, we believe that a positive environmental impact can be achieved through the delivery of programs (such as those proposed by No More Butts) around awareness, infrastructure and recycling initiatives.

We endorse the nomination for cigarette butts to be added to the Ministers priority list. If you have any questions about this endorsement, please don't hesitate to contact the undersigned.

Yours sincerely,



Name: Solomon J. Wadani
Title | Department: Data and Program Manager
Company: SeabinTM
Contact number: 0475 101 879
Contact email: solomon@seabinproject.com



30 November 2021

To Whom It May Concern,

This letter is to support the nomination made by No More Butts to add cigarette butts to the Minister's product stewardship priority product list. Cigarette butts have, and continue to be the number one littered item within the Byron Shire, despite considerable efforts to reduce this through our campaign 'Butt Free Byron Shire'. To achieve further reductions in cigarette butt litter, a greater nation-wide shift is required.

The implementation of a product stewardship scheme would allow considerable reductions in cigarette butt litter to be achieved that would have substantial social, environmental and economic benefits for our organisation and Australia as a whole. As the most littered item in Australia, cigarette butts have a negative impact on human health and our environment:

- Cigarettes are known to contain over 4,000 chemicals, most of which are trapped in the filter (butt) and littered into the environment where they pollute soil and water
- These chemicals when leached into the environment have harmful effects on marine life and have been shown to lead to the death of fish in studies.
- Studies have identified that microplastics (such as the strands of cellulose from the filters) are now found in over 90% of salt products and 1/3 of fish. The human ingestion of plastics and its chemical substances through these foods is known to have harmful effects on human health.
- Cigarette butts are also extremely costly to clean-up for local councils and businesses.

Cigarette butts should be added to the Minister's product stewardship priority product list because:

- Global programs exist for scaled recycling of cigarette butts, meaning there is potential for these resources to be recovered
- A reduction in the amount of cigarette butt litter would lessen the environmental impacts on flora, fauna and marine life, as well as soil quality
- A reduction in smoking from increased awareness of the impacts to the environment would have health benefits for humans.

We believe that a coordinated national product stewardship scheme would enable greater action to be taken that would achieve the following:

- Reduction in littering of single use plastics
- Diversion of waste plastics from landfill
- Reduction in waste/mixed plastic being exported
- Opportunities for new materials to be used in a more circular fashion



TRADITIONAL HOME OF
THE BUNDJALUNG PEOPLE

ALL COMMUNICATIONS TO BE
ADDRESSED TO THE GENERAL MANAGER
PO Box 219 Mullumbimby NSW 2482 (70 Station Street)
E: council@byron.nsw.gov.au
P: 02 6626 7000 F: 02 6684 3018
www.byron.nsw.gov.au ABN: 14 472 131 473

- Consumer awareness of plastics in filters
- Reduction of related cleaning costs
- Shifting financial accountability from councils to producers
- Obvious health benefits from the reduction of smoking as a result of increased awareness

In general, we believe that a positive environmental impact can be achieved through the delivery of programs (such as those proposed by No More Butts) around awareness, infrastructure and recycling initiatives.

We endorse the nomination for cigarette butts to be added to the Ministers priority list. If you have any questions about this endorsement, please don't hesitate to contact the undersigned.

Yours sincerely,



Zoe White
Waste Education and Compliance Officer | Resource Recovery
Byron Shire Council
Contact number: 6626 7236
Contact email: zwhite@byron.nsw.gov.au



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THE BUNDJALUNG PEOPLE

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P: 02 6626 7000 F: 02 6684 3018
www.byron.nsw.gov.au ABN: 14 472 131 473

30/11/2021

To whom it may concern

Product Stewardship Priority – Cigarette Butts

This letter is to support the nomination made by No More Butts to add cigarette butts to the Minister's product stewardship priority product list.

Cigarette butts are a single-use plastic and the most littered item in Australia.

Cigarette butt litter is highly toxic and highly mobile, resulting in large quantities of polluted plastic ending up in the terrestrial and marine environments each year.

As cigarette butts break up in the environment, they produce contaminated micro-plastics that can harm and kill wildlife, as well as enter the food chain.

Reducing cigarette butt litter through product stewardship and responsible disposal reduces bushfire risk and associated impacts on environment, community and economy.

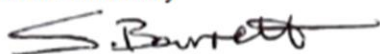
A coordinated national product stewardship scheme would enable:

- Reduction in littering of single use plastics
- Diversion of waste plastics from landfill
- Reduction in waste/mixed plastic being exported
- Opportunities for new materials to be used in a more circular fashion
- Consumer awareness of plastics in filters
- Reduction of related cleaning costs
- Shifting financial accountability from councils to producers
- Obvious health benefits from the reduction of smoking as a result of increased awareness

In general, we believe that a positive environmental impact can be achieved through the delivery of programs (such as those proposed by No More Butts) around awareness, infrastructure and recycling initiatives.

Council officers endorse the nomination for cigarette butts to be added to the Ministers priority list. If you have any questions about this endorsement, please don't hesitate to contact the undersigned.

Yours sincerely



Sophie Barrett
Coordinator Sustainability



We believe that a coordinated national product stewardship scheme would enable greater action to be taken.

- Reduction in littering of single use plastics
- Diversion of waste plastics from landfill
- Reduction in waste/mixed plastic being exported
- Opportunities for new materials to be used in a more circular fashion
- Consumer awareness of plastics in filters
- Reduction of related cleaning costs
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- Obvious health benefits from the reduction of smoking as a result of increased awareness

In general, we believe that a positive environmental impact can be achieved through the delivery of programs (such as those proposed by No More Butts) around awareness, infrastructure and recycling initiatives.

We endorse the nomination for cigarette butts to be added to the Ministers priority list. If you have any questions about this endorsement, please don't hesitate to contact the undersigned.

Yours sincerely,
Amanda Morgan

Director and Head of Research and Development
Fungi Solutions Pty Ltd
0423306537
Amanda@fungisolutions.com.au

Our Ref:

Z21/270992

File:

IW-075.385.04.019

Date:

15 December 2021

To whom it may concern,

PRODUCT STEWARDSHIP PRIORITY PRODUCT LIST NOMINATION

This letter is to support the nomination made by No More Butts to add cigarette butts to the Minister's product stewardship priority product list.

As the most littered item in Australia, cigarette butts have a negative impact on health and our environment:

- Cigarettes are known to contain over 4,000 chemicals, most of which are trapped in the filter (butt) and littered into the environment where they pollute soil and water
- Global programs exist for scaled recycling of cigarette butts
- A reduction in the amount of litter would have a positive impact on flora, fauna and marine life, as well as soil quality
- A reduction in smoking from increased awareness of the impacts to the environment would have health benefits for humans. There is also an assumption that those who eat fish may be consuming micro plastics, including the strands of cellulose from the filters

There is enormous cost to clean-up for local councils and businesses.

We believe that a coordinated national product stewardship scheme would enable greater action to be taken.

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- Shifting financial accountability from councils to producers
- Obvious health benefits from the reduction of smoking as a result of increased awareness

In general, we believe that a positive environmental impact can be achieved through the delivery of programs (such as those proposed by No More Butts) around awareness, infrastructure and recycling initiatives.

We endorse the nomination for cigarette butts to be added to the Ministers priority list.

Please contact me should you require further information.

This letter is authorised by

Paul Tracey
Manager Open Space and Environmental Services (Acting)
Wollongong City Council
Telephone (02) 4227 7111

18 SEPTEMBER 2021



7th December 2021

To Whom It May Concern:

This letter is to support the nomination made by No More Butts to add cigarette butts to the Minister's product stewardship priority product list.

As the most littered item in Australia, cigarette butts have a negative impact on health and our environment.

There is enormous cost to clean-up for local councils and businesses.

We believe that a coordinated national product stewardship scheme would enable greater action to be taken.

In general, we believe that a positive environmental impact can be achieved through the delivery of programs (such as those proposed by No More Butts) around awareness, infrastructure and recycling initiatives.

Let's Do It Australia is a proud supporter of all efforts to reduce waste and clean up our natural and built environment. In our experience, No More Butts is a responsible, committed organisation driven by a passion for the environment. Let's Do It Australia hopes to find further opportunities in the future to collaborate with No More Butts on clean-up activities and awareness.

We endorse the nomination for cigarette butts to be added to the Ministers priority list. If you have any questions about this endorsement, please don't hesitate to contact the undersigned.

Best Regards,

Vashti Maher, President

Let's Do It Australia Incorporated (ABN 21 838 858 033)

LDIAustralia.Incorporated@gmail.com

0425 851 153

Sign up for World Cleanup Day <https://www.worldcleanupday.org/country/australia>

18 SEPTEMBER 2021



Commonwealth Department of Agriculture, Water and Environment
Canberra, ACT 2600

17 December 2021

By email: ministers.stewardship.list@awe.gov.au

RE: Nominations for Ministers Priority List 2022-23 - Product Stewardship

Thank you for the opportunity to provide our views on the next nominated products for the Ministers Priority list for a product stewardship scheme.

In Brief

The Boomerang Alliance and our allied groups, urge the establishment of a mandatory Product Stewardship (PS) Scheme for Problematic and Unnecessary Plastics as a priority for 2022-23. This PS Scheme should also have mandatory targets consistent with National Waste Plan 2025 goals.

To make the scheme manageable, achievable, and transparent, we have outlined a PS Scheme for Plastics that includes:

- Current and existing plastic items under PS arrangements
- A program to ban problematic plastics
- A PS scheme for cigarette butts

For over 25 years (or longer) our organisations and the broader community have observed the promises and the failures of voluntary product schemes. It is time to put in place a regulatory framework that will be effective in delivering 2025 targets.

Product Stewardship

The Boomerang Alliance would like to note that any products listed under Product Stewardship arrangements have been nominated because they are recognised as problem wastes that have not been properly addressed by the manufacturer or manufacturing sector.



Good morning Shannon,

My apologies for the delay in replying.

I have followed up with our National Marine Debris Coordinator and she came back and advised that we have put in a submission and support your nomination.

Keep up the great work.

Have a great day
Grahame Lloyd
Sea Shepherd Marine Debris Campaign Australia

Every third breath we take comes from our oceans

DEFEND - CONSERVE - PROTECT

W: www.seashepherd.org.au/marinedebris/

FB: <https://facebook.com/SSAUBeachCleanUps/>

IG: seashepherdmarinedebristeam

APPENDIX 2

REFERENCE

MATERIAL

NOMOREBUTTS

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Acronyms

Acronym	Definition
APCO	Australian Packaging Covenant Organisation
ARL	Australasian Recycling Label
ALM / AusLM	Australian Litter Measure
DAWE	Dept. Agriculture, Water and the Environment
BATA	British American Tobacco Australia
DfE	Design for Environment
EPA	Environmental Protection Agency
EPR	Extended Producer Responsibility
ITA	Imperial Tobacco Australia
KAB	Keep Australia Beautiful
KPI	Key Performance Indicator
LDIW	Let's Do It World
NGO	Non Government Organisation
PMI	Philip Morris International
PML	Philip Morris Limited
RMIT	Royal Melbourne Institute of Technology
TIPSS	Tobacco Industry Product Stewardship Scheme
WWF	World Wide Fund for Nature

NOMOREBUTTS

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@NoMoreButtsAU
#nomorebutts



ABN: 48 641 916 903



NOMOREBUTTS