

# **NOMOREBUTTS**

**IGNITING A NEW SCHEME:**

**NOMINATION OF CIGARETTE BUTTS**

**FOR THE MINISTER'S**

**PRODUCT STEWARDSHIP**

**LIST OF PRIORITY PRODUCTS**

**January 2022**



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## Acronyms

Acronym	Definition
APCO	Australian Packaging Covenant Organisation
ARL	Australasian Recycling Label
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



## Executive Summary

Cigarette butts are the most littered item in Australia<sup>1</sup>.

Most recent estimates suggest that up to 8.9 billion cigarette butts are littered into the Australian environment every year<sup>2</sup>. 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 chemicals<sup>3</sup> and the view that each butt can contaminate up to 40 litres of water<sup>4</sup>, and have been proven to kill fish in as little as one litre,<sup>5</sup> 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 down<sup>6</sup>. 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 year<sup>7</sup>.

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 \$150 million<sup>8</sup> 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.

As a registered charity dedicated to this initiative, No More Butts is able to independently facilitate the formation of a task force, and drive outcomes, to ensure the successful implementation of initiatives under a Tobacco Industry Product Stewardship Scheme.

## The National Plastics Plan

On March 4<sup>th</sup> 2021, the Assistant Minister for Waste Reduction and Environmental Management, along with the Federal Minister for the Environment, announced that, as part of the National Plastics Plan, an action would be taken to address the issue of plastics in cigarette butt filters.

Specifically, this action notes that the Australian Government will initiate an industry-led, cross-sectoral stewardship task force to reduce cigarette butt litter in Australia, and consider potential stewardship schemes.

At the time of writing, No More Butts has not been informed of any concrete progress towards these planned actions.

## Minister's List of Priority Products

In November 2021, the Minister announced that nominations were open for the 2022 – 23 list of priority products.

*“Each year the Minister for the Environment releases a product stewardship priority list. This annual list identifies products and materials for which industry is expected to take product stewardship action. Product stewardship plays an important role in helping individuals and companies take responsibility for reducing the environmental, social and health impacts of their manufactured goods and materials across the whole life cycle.”*

No More Butts notes that, *“priority will be given to products and materials where there are clearly identifiable product stewardship actions that provide environmental, social and health benefits, where there is industry buy-in to change practices, and where these actions will contribute to domestic targets and international commitments.”*

## Purpose of this Document

This document provides a comprehensive overview to support a nomination for **cigarette butts** to be included in the Minister's list of priority products for product stewardship for 2022 – 2023.

Further, this document should be considered as a resource for the Commonwealth Government and related departments, including the Plastics Plan team 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.

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



*A Product Stewardship scheme exists for tyres – can it exist for cigarette butts?*

# SECTION 1

**PRIORITY LIST**

**NOMINATION**

**NOMOREBUTTS**



## Product or Material

*Briefly describe the product or material you are nominating for inclusion on the Minister's priority list.*

The specific product nominated for inclusion is cigarette butt 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.

No More Butts recommends that, in addition to cigarette butt filters, all tobacco and non-tobacco related smoking products should be included in an overall stewardship approach, including but not limited to: smoking related packaging, along with both nicotine and non-nicotine vaping devices and products.



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

*(Karen Mason/Facebook)*

## Product or Material

*Provide one or more measurable and realistic target(s) for the nominated product or material that could be achieved once the proposed actions have been taken. (e.g. waste to landfill reduced by x%, increased market share for reusable / recycled product).*

- A 50% reduction in littering rates of cigarettes and related packaging, resulting in more than 4 billion butts (approximately 800 tonnes of waste plastic) being prevented from entering the environment every year
- A 20% reduction of cigarette butt waste to landfill, resulting in the reduction of an estimated nearly 400 tonnes of waste plastic
- An annual saving of at least \$50 million from Australian council and government agency budgets related to cigarette butt litter programs
- A reduction of smoking as an indirect consequence of increased awareness regarding the environmental impacts of smoking to below 10%, which is in line with the Australian target
- Implementation of 'recycled' cigarette butt filters as a source material in recycled content procurement, enabling objectives of circular economy to be accelerated

## Support for Action

*Provide evidence that the proposed actions are likely to be led, driven and achieved by industry groups, consumer groups, local, state and territory governments and / or others that have sufficient capacity and resources.*

No More Butts has sourced endorsements and Letters of Support from other environmental organisations and NGOs, local government bodies, as well as waste and recycling industry businesses and research partners. These are included in this document in Appendix 1.

In addition, 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.

The NSW State Government has already targeted an Extended Producer Responsibility scheme for cigarette butts in their Plastic Action Plan.

This level of support gives No More Butts significant confidence that all Australian stakeholders are ready to deliver the outcomes planned as part of the implementation of a product stewardship scheme.

## Reasons for Listing

*Provide evidence that the product or material is sold in more than one state or territory – consistent with the product stewardship criteria set out in section 14 of the Recycling and Waste Reduction Act 2020.*

The supply of cigarettes is ubiquitous across all Australian states and territories. Although sale is restricted to those aged over 18, they are readily available in most supermarkets, convenience stores, petrol stations, and specialist tobacconist stores. They have traditionally been the highest revenue contributor within supermarkets, which are the highest ranked business type across Australia in terms of cigarette sales.

*Which criteria does this product or material address – consistent with the product stewardship criteria set out in section 14 of the Recycling and Waste Reduction Act 2020. [choose as many as are relevant]:*

*the product contains hazardous substances;*

*there is the potential to significantly increase the conservation of materials used in the product or the recovery of resources (including materials and energy) from waste from the product;*

*there is the potential to significantly reduce the impact that the product has on the environment, or that substances in the product have on the environment, or on the health or safety of humans.*



## Reasons for Listing

*Provide evidence of how this applies in relation to the product or material*

Cigarettes are reported by the Australian Government 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.

The filter of a cigarette is made of cellulose acetate fibres. In addition to providing a texture and taste for the smoker, the filter modifies the particulate smoke components through particle retention. 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.

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.

## Reasons for Listing

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

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.

While Design for Environment (DfE) and EOL management are both key items, national awareness of the environmental impacts of cigarette butt filters and reduction of litter, as well as scaling of national infrastructure and litter retrieval programs based on KPIs and a national database of reporting, will also reduce the negative effects of cigarette butts on both humans and the environment.

*What are the current negative environmental and health impacts of this product or material? At what stages of the product's or material's lifecycle do these impacts occur? How will these impacts increase, decrease, or remain unchanged if action is taken and if action is not taken?*

The primary concern of the Australian government when it comes to cigarette butts is when, how, and by whom they are consumed and discarded.

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 Australia, and storage.

## Reasons for Listing

Cigarettes contain 7,000 chemicals, including 250 that are known to be harmful, including hydrogen cyanide, carbon monoxide, and ammonia. The negative health impacts are well documented, with an estimated 24,000 deaths attributed to smoking in Australia each year. It has not been proven that the filters provide any health benefits to smokers.

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.

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.

Whilst cigarette butt filters are the primary focus of the product stewardship, consideration needs to be given for the emerging trend of vaping and the implications to the environment of vaping devices.



*Cigarette butt litter remains the most reported litter item*

## Proposed actions and timeframes

*What actions need to be taken at relevant steps in the product's lifecycle to help achieve the product stewardship targets described in Question 4? How do you propose these actions will be conducted and who is responsible for these actions? What timeframes are required to complete the proposed actions?*

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

Filterless cigarettes are an option worth considering.

The key consideration and action is based around the awareness, reduction in littering, diversion from landfill, and scaling abilities for the re-use of plastic cigarette butt filters as a composite.

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.

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.



## Proposed actions and timeframes

No More Butts has designed programs that can be implemented to support the collection and recycling of cigarette butts, including enabling a rebate for those collecting the butts as a source material.

By implementing fit-for-purpose infrastructure across LGAs, implementing smoke-free zones and/or designated smoking areas, there would be a significant reduction in the toxic waste ending up in landfill.

With collection depots and potentially recycling / mycocycling centres across Australia, the source material would end up being readily available to scale provision for recycled content construction projects across LGAs.

Councils, along with the recycling and waste industry and environmental organisations, would be expected to continue to execute programs. However, they should follow a national framework and be funded by tobacco companies, proportionate to reported market share. Ultimately, the financial responsibility should sit with Producers (tobacco) after a baseline has been set. The baseline activities could be funded through a percentage of the overall duties and excise collected from the sale of cigarettes in Australia. 1% would enable a budget of 150 million dollars.

A national awareness program would be the first coordinated step, which could happen immediately. No More Butts has created specific assets which can be made available for use on a national basis. Alternatively, pre-existing assets used by peak bodies, such as EPA NSW, could be scaled across the country.

Activities could commence immediately after funding is confirmed and would be completed by 2025, in line with Waste targets and also in line with Producer targets and the new New Zealand smokefree plan.

## Proposed actions and timeframes

*How likely is the adoption by industry of the proposed actions (e.g. technology is ready and available at scale, action could be economically viable, action is easy to implement). Are there any key barriers that need addressing for large-scale adoption of new practices?*

With the right awareness programs, adequate fit-for-purpose infrastructure, and the utilisation of existing sorting facilities, the litter and landfill re-direction actions can easily be implemented.

Data collection to set a baseline and track success is a key item that needs addressing, but this is listed as a separate action in the National Plastics Plan. So, whilst this is a dependency, it should not be considered as a barrier.

Alignment with the Commonwealth Health Department to enable changes to legislation to include labelling to highlight the adverse environmental impacts of filtered cigarettes would be required, whilst reviewing the ultimate need for removal of plastic filters from cigarettes.

Barriers for large-scale adoption of using cigarette butt filters as a commodity and source material for recycled content projects include the ability to be included in Recycling Modernisation Fund rounds. As a waste plastic, this should already be the case, but states have been hesitant to allow submissions because cigarette butts aren't a 'priority product'. It is known, however, through at least three different methods, that cigarette butt filters can be recycled/upcycled with minimal investment.

## Proposed actions and timeframes

*Briefly describe any potential knowledge and / or technology gaps and barriers that may delay implementation of proposed actions across the sector. Provide recommendations as to how these are being / could be addressed.*

Access to consistent data has always been a big gap in litter reporting. The Commonwealth has already made a commitment in the National Plastics Plan to address this gap.

Legislation around Plain Packaging for tobacco is a potential barrier to implementation of environmental labelling. However, with the right advocacy and support from the Commonwealth government, this should be achievable.

Currently, Australia does not have equipment in country that enables the processing of the cellulose in the plastic filters to create plastic pellets that can be used in recycled content projects. However, this could be funded cost effectively by opening up future RMF applications to include cigarette butt filters as a waste (mixed) plastic.

Similarly, the ability to scale mycocyling centres is currently only restricted by knowledge and geographic reach. These can both be addressed through the provision of grants under RMF to scale centres in locations around Australia. It is possible that companies with an existing national footprint can scale mycocyling effectively without significant funding.

As a potential source material for construction materials such concrete, this is a matter of ensuring a supply chain to collect, transport, and store the cigarette butts from sources across Australia (such as litter, waste and landfill), using platforms such as ASPIRE.

## Proposed actions and timeframes

*Provide examples (if any) where the proposed or similar actions for the product or material are already occurring or are likely to occur soon. Describe what product stewardship related actions are occurring, who is leading the action, and what are the actual or potential outcomes. Describe how listing the proposed product or material on the Minister's priority list will initiate or accelerate product stewardship outcomes.*

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 9<sup>th</sup> December 2021.

UK is in the middle of a consultation period to remove plastic filters.

The EU has implemented mandatory labels to alert consumers that filters contain plastic, whereas San Francisco has a history of collecting litter taxes from retailers, along with charging tobacco companies for the cost of cleaning up.

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 from Governments engaging with Tobacco collaboratively on projects. No More Butts should be considered as a strong option to lead the design and implementation of programs.

By listing cigarette butt filters on the priority products list, this will enable discussion and action to take place in a coordinated and accountable manner with Tobacco companies in Australia. It will enable a cross-sectoral implementation of initiatives. Without a formal scheme in place, the current non-accredited, voluntary industry scheme will remain ineffective.

## Impacts

*How will outcomes be measured, and the achievement of targets be demonstrated?*

Ideally, we would use the planned national database for litter to enable the baseline measurement, however it is unlikely that it will be ready in time for this commencement of any product stewardship initiatives. It would therefore be a requirement of the steering committee to determine the best source data from the currently available databases to create a baseline of litter. Then, there should be yearly measurements made to identify the reduction at a rate consistent with the reduction target by 2025.

The key metrics would be the calculation of the reduction in litter, the amount of material that is used in recycled content projects, and the implementation of schemes, such as refund schemes.

Access to importation and retail sales data of cigarettes is a key element to this product stewardship program, so that there can be measures of the reduction of sales and consumption, as well as determining revenue and market share for financial accountability. This information is not currently readily available.

The ultimate goal could see the complete removal of cigarette butt filters, but this would need to be agreed to at the start, in conjunction with other state and Commonwealth Government departments, to ensure that any investments in using the filters as a commodity aren't wasted in the future.



## Impacts

*How will the proposed action contribute to Australia meeting its domestic and international commitments on waste and possibly greenhouse gas emissions reduction? For example, how will they contribute to targets set out in the [National Waste Policy Action Plan](#).*

When littered into the environment, each cigarette butt can contaminate up to 40 litres of water. The threats to the Great Barrier Reef include water quality and marine debris / micro plastics, to which cigarette butts contribute. A 50% reduction in litter will positively impact the Reef and our overall marine environment.

When a lit cigarette is littered, they can contribute to bushfires. These have devastating impacts on forests and result in further impact to our valuable ecosystem. A reduction in litter will naturally see a reduction in bushfires.

The re-direction of hundreds of tonnes of non-biodegradable plastic cigarette filters from landfill is expected to reduce the environmental impact of the toxic chemicals and heavy metals leaching into the environment.

As a waste plastic, saving hundreds of tonnes from impacting the environment and diverting hundreds more tonnes of plastic from landfill goes towards the National Waste Policy Action Plan. By including cigarette butts on the plastic export ban, this will address Target 1.

Target 5 of phasing out problematic plastics would be addressed, with a 50% reduction by 2025. By using cigarette butt filters as a source material for recycled content projects, this will help achieve Target 4.

## Impacts

*What adverse environmental and health impacts may the proposed action have – if any?*

Depending on the scale of implementation of agreed initiatives, there are limited impacts of proposed actions.

There is no research to suggest that the removal of plastic filters from cigarettes would have any adverse health impacts of smokers.

The implementation of wide scale initiatives, such as production and installation of additional infrastructure and transportation to centralised recycling facilities, would generate emissions. However, these would be more than offset by what is recovered from the environment and landfill.

Further research into mycocyling will determine any residual heavy metals and levels of toxicity present in remediated filters, although this will still be at a lower level than the current situation.

Using cigarette butts as a composite material in concrete creates a theoretical risk of leaching. This is expected to be mitigated by using additional products to encapsulate the cigarette butts. In any event, the risk is less than sitting in the environment or landfill.

## Privacy and confidentiality

Our response is not confidential.

We agree to our response being published on the DAW website.

We don't need to de-identify our response(s).

We have read and understood the privacy and submission declarations.

## SECTION 2



LETTERS OF SUPPORT

**NOMOREBUTTS**

# Index of Letters of Support for this Nomination

- NSW Government - Department of Planning, Industry & Environment
- Melbourne Waste & Resource Recovery Group
- KABC WA
- Equilibrium
- RMIT
- RecycleSmart
- Butt Out Australia
- Envirocorp
- Fungi Solutions
- Ocean Protect
- 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](mailto: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](mailto: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](mailto: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)

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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](mailto: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](http://equil.com.au) [info@equil.com.au](mailto: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**

29<sup>th</sup> 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](mailto:jie.li@rmit.edu.au)



**10 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:

- 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
- 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,

**Eugenie Alonzo**

Chief Marketing Officer

RecycleSmart

0431 243 546

[eugenie.alonzo@recyclesmart.com](mailto:eugenie.alonzo@recyclesmart.com)

A handwritten signature in black ink, appearing to be 'Eugenie Alonzo', written in a cursive style.

25<sup>th</sup> 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

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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- 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,



Cameron Fox  
General Manager  
Envirocorp Group Pty Ltd





25<sup>th</sup> 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

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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,

A handwritten signature in black ink, appearing to read "J. Kruisheer", is written over a light blue horizontal line.

Jeremy Kruisheer  
Managing Director  
Buttout Australia  
1800358258  
jeremy@buttoutaustralia.com.au



FUNGI SOLUTIONS PTY LTD  
ABN 31 644 612 000

Amanda Morgan  
Co-Founder, Fungi Solutions  
[Amanda@fungisolutions.com.au](mailto:Amanda@fungisolutions.com.au)  
0423306537

10 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. The toxic leachate from discarded cigarettes has a well documented run on impact that contaminates our natural resources, causes long term health impacts for communities and presents a growing landfill challenge.

- 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.

Our Ref: L.NoMoreButts.01

25 November 2021

**RE: SUPPORT FOR CIGARETTE BUTTS TO BE ADDED TO MINISTER'S PRODUCT STEWARDSHIP PRIORITY LIST**

I am Principal Environmental Engineer at Ocean Protect and Adjunct Lecturer at Griffith University.

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
- 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.

Please do not hesitate to contact me if you have any questions or would like to discuss anything further.

**Yours faithfully**

A handwritten signature in blue ink, appearing to read "Brad Dalrymple". The signature is fluid and cursive, with a large initial "B" and "D".

**Brad Dalrymple**  
**Principal Environmental Engineer**

29<sup>th</sup> 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
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- 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 don't hesitate to contact the undersigned.

Yours sincerely,





**Name:** Solomon J. Wadani  
**Title | Department:** Data and Program Manager  
**Company:** Seabin<sup>TM</sup>  
**Contact number:** 0475 101 879  
**Contact email:** [solomon@seabinproject.com](mailto: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](mailto:council@byron.nsw.gov.au)  
P: 02 6626 7000 F: 02 6684 3018  
[www.byron.nsw.gov.au](http://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](mailto:zwhite@byron.nsw.gov.au)



TRADITIONAL HOME OF  
THE BUNDJALUNG PEOPLE

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PO Box 219 Mullumbimby NSW 2482 (70 Station Street)  
E: [council@byron.nsw.gov.au](mailto:council@byron.nsw.gov.au)  
P: 02 6626 7000 F: 02 6684 3018  
[www.byron.nsw.gov.au](http://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.

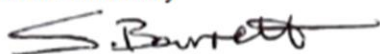
A coordinated national product stewardship scheme would enable:

- 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
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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



7<sup>th</sup> 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](mailto: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](mailto: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/](http://www.seashepherd.org.au/marinedebris/)

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

IG: seashepherdmarinedebristeam

## **Index of Letters of Support for previous Grants**

- City of Kingston
- ASPIRE
- Boral

*These letters have been included as an indication of support from further industry groups for product stewardship initiatives proposed under grant applications.*

*Whilst we are confident that these businesses still support initiatives and therefore this nomination, the inclusion of these letters should not be considered as specific endorsement of the No More Butts nomination for the Priority List.*



15<sup>th</sup> March 2021



**Re: Letter of Endorsement for No More Butts**

To Whom It May Concern:

This letter is to recognise the work that No More Butts, a business name of the registered Australian charity, NO BUTTS ABOUT IT (INTERNATIONAL) LTD, ABN: 48641916903 is doing within Victoria and Australia to address cigarette butt litter.

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

In particular, we understand that a program proposed under this grant application will engage our community, whilst helping reduce cigarette butts (non-organic material) from going to landfill.

A successful grant outcome will see our community engaged in a cigarette butt recycling program. Instead of ending up in landfill, the cigarette butts will be directed to an innovative Victorian business, who have created a process to break down cigarette butt filters using mycelium. In particular, oyster mushrooms and the mycelium derived from them have been found to be efficient at breaking down the cellulose acetate in cigarette butts filters, rendering it biodegradable. The by-product can then be used for a wide range of materials, such as non-plastic packaging, to further increase environmental sustainability and a recycling ethos.

We see this as driving awareness of circular economy initiatives within our community. With a successful implementation, this should be able to provide Victorian businesses with new opportunities, revenue and employment.

As such, we formally endorse the grant application made by No More Butts.

If you have any questions about this endorsement, please don't hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in black ink that reads 'Angela Stubbs'.

ANGELA STUBBS  
Senior Business Project Officer  
City of Kingston  
d 9581 4787 m 0419 874 774  
Contact email: [angela.stubbs@kingston.vic.gov.au](mailto:angela.stubbs@kingston.vic.gov.au)

17th March 2021

To Whom It May Concern:

This letter is to recognise the work that No More Butts, a business name of the registered Australian charity, NO BUTTS ABOUT IT (INTERNATIONAL) LTD, ABN: 48641916903 is doing within Australia to address cigarette butt litter.

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

In particular, we understand that a program proposed under this grant application will engage the community, whilst helping reduce cigarette butts (non-organic material) from going to landfill. A successful grant outcome will see the community engaged in a cigarette butt recycling program. Instead of ending up in landfill, they would be directed to commercialise 15 years of research by RMIT in delivering a field trial of using shredded cigarette butts as a composite material in a construction project. Using the resources of a national building supply company, they would be laying a concrete slab as a proof of concept and then looking to scale this solution across other building supply companies across Australia.

We see this as driving awareness of circular economy initiatives within our community. With a successful implementation, this should be able to provide businesses with new opportunities, revenue and employment.

As such, we formally endorse the grant application made by No More Butts and will assist them where possible to implement their idea, leveraging the ASPIRE platform to connect businesses with this new commodity.

If you have any questions about this endorsement, please don't hesitate to contact the undersigned.

Yours sincerely,

**Cameron McKenzie**  
CEO | Circular Economy  
☎ +61 417 212 240  
✉ [camm@aspireme.com](mailto:camm@aspireme.com)  
🏠 [www.aspireme.com](http://www.aspireme.com)



Boral Limited  
Level 3, 40 Mount Street  
North Sydney NSW 2060  
PO Box 1228  
North Sydney NSW 2059

M: 0447 127 000

E: Louise.keyte@boral.com.au

**Recycling Victoria Business Fund**

8th March 2021

To Whom It May Concern:

This letter is to support NO BUTTS ABOUT IT (INTERNATIONAL) LTD, a registered Australian charity in their grant application under Stream 1 of the Recycling Victoria Business Fund.

Operating under their registered business name, No More Butts, they are helping address the issue of cigarette butt waste across Victoria and Australia.

We understand that No More Butts will be applying for a grant under Stream 1 of the Recycling Victoria Business Fund to prevent cigarette butt waste from going to landfill, and similarly exploring the opportunity for a new recycling market for this waste stream.

A successful outcome will assist with landfill re-direction and will provide an opportunity to explore new materials for future sustainability projects within Victoria and Australia.

If No More Butts is awarded a grant, Boral will provide in-kind support to the project in the form of supply of concrete required a field test, staff time for design and supervision of field testing, as well as access to Boral sites to perform field testing. Field testing will aim at assessing the performance of cigarette butts in concrete to validate the methodology developed by RMIT and No More Butts.

Boral will further assist the project team in identifying potential product development and commercialisation opportunities based on the findings of laboratory investigation and field testing.

If you have any questions, please don't hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to be "Louise Keyte".

Dr Louise Keyte

GM Innovation Development

Boral Ltd

# SECTION 3

**DETAILED**

**BACKGROUND**

**NOMOREBUTTS**



# Product Stewardship

Product stewardship is an approach to managing the environmental impacts of different products and materials at different stages in their production, use and disposal. It is based on the assumption that there is a shared responsibility for those involved in producing, selling, using and disposing of products, to ensure that those products or materials are managed in a way that reduces their impact, throughout their lifecycle, on the environment and on human health and safety.

Extended Producer Responsibility is sometimes used as a term when discussing Product Stewardship. Whilst it has a similar approach, Product Stewardship extends the responsibility to everyone involved in the life-cycle of the product - not only manufacturers. While both concepts shift the responsibility of waste management for end-of-life products from the government to the manufacturers, Product Stewardship ensures inclusion of retailers, consumers and industry partners, such as recyclers.

As per the Australian Government Department of Agriculture, Water and the Environment:

*Product stewardship is an approach to managing the impacts of different products and materials on the environment and human health and safety. Product stewardship schemes help to manage these impacts over a product's life-cycle.*

*These schemes can be:*

- *industry-led voluntary schemes*
- *co-regulatory arrangements between industry and government\*
- *mandatory schemes under law.*

*Everyone who imports, designs, produces, sells, uses and disposes of products has a shared responsibility to reduce the environmental and human health and safety impacts of those products. Examples of good product stewardship are when:*

- people recycle products, and their packaging*
- companies design their products for easier recycling*
- companies use more recycled materials and less resources to manufacture their products*
- companies limit the hazardous materials their products contain*



## **The Importance of Product Stewardship for Tobacco in Australia**

Despite being the highest reported contributor to litter across Australian states, there is currently no formal Product Stewardship Scheme in place for cigarette butts.

No More Butts has engaged with multiple local, State and Commonwealth Government departments, environmental organisations, individuals, businesses, research companies and the tobacco industry to understand the current status. It was quickly identified that the well-meaning minor actions of some groups are limited in their impact. Many often only dedicate a portion of their time to this issue, and are not scaled to have a national impact when addressing the issue of cigarette butts.

A Product Stewardship Scheme would enable a greater focus on data and insights to be facilitated to help standardise national reporting. There is currently no adequate database for litter. These insights can assist in pushing for extended producer responsibility, along with requesting support from the Federal Government for redirection of taxes and planned price rises towards litter prevention and collection programs.

In overseas markets, data has driven both governments and tobacco industry to action, leading to successful waste redirection and recycling initiatives.

A Scheme could also pave the way for a stronger discussion on a State level to access funds from the Recycling Modernisation Fund, by defining cigarette butts as waste plastic.

With a new focus on remanufacturing, a product stewardship program could also aim to standardise Australian made butt bins to manufacture at volume, reducing cost impacts on local governments.

The implementation of a Product Stewardship Scheme will facilitate discussions across all stakeholders to drive the change required for a positive environmental impact.

## **The History of Tobacco Product Stewardship in Australia**

In 2003, tobacco companies in Australia came together to participate in a product stewardship scheme, led by British American Tobacco Australia. They reportedly generated \$5 million in funding and implemented a Butt Litter Trust. However, this made little impact into the issue. The funds seemingly focused on clean up events, rather than awareness and research. Whilst there was a recycling trial, the engagement was seemingly from environmental organisations, not businesses and retailers. This formal engagement and Trust appears to have ceased years ago.

### **Recent Australian initiatives**

In Australia, many state bodies have their own messaging campaigns, with some looking at cigarette butts as an isolated litter source and others considering it along side all other litter. Most grants that are made available, from organisations such as the EPA, focus on local clean-up events and prevention campaigns, including installations of dedicated infrastructure, rather than national awareness.

Byron Bay shire partnered with EnviroCorp to deliver dedicated receptacles that collected the butts. In addition, they provided local awareness campaigns and signage. This was seemingly an effective program, yet hasn't scaled to other areas. City of Melbourne also partners with EnviroCorp and TerraCycle to deploy infrastructure to collect cigarette butt waste and direct it to the US for recycling.

Wollongong City Council is renewing its effort to eliminate cigarette litter, with the launch of its educational No Butts Trail and the installation of 30 new cigarette butt bins. The 30 new bins will be installed across 10 waterside locations, from Stanwell Park Reserve, to the Windang Bridge. The locations are recognised community hotspots for traffic and cigarette use, and the installation of bins will provide options for smokers to dispose of butts correctly and safely. This project has been delivered in partnership with the NSW Environment Protection Authority, Waste Less Recycle More initiative funded from the waste levy.

In Sunshine Coast, one organisation implemented an idea from the UK of a Butt Ballot Box. This provided a reduction in one hot-spot, however the security and servicing of these bins needs to be assessed before a mass-scale deployment.

Wollongong has also recently engaged No More Butts to deliver an Australian-first program to collect, count and sort cigarette butts that are collected in the City and re-direct them from landfill for research into potential circular outcomes, using mycology.

## International initiatives

In Europe, Litterati has deployed pilots where data has been collected to determine the baseline cost associated with cleaning cigarette butt litter. They have then engaged with the government and tobacco companies on budgets for infrastructure and litter collection. In San Francisco, an earlier project provided an overview of annual costs to deal with cigarette butt litter. As a result, the City charges the tobacco companies \$4m USD annually to cover these costs.

In USA and Canada, tobacco companies have engaged with social enterprises to help meet their sustainability goals. In Canada, TerraCycle has an end-to-end solution where infrastructure is deployed and serviced, with the contents being recycled into plastic pellets. Backed by a tobacco company, TerraCycle offers money per pound for returned cigarette butt filters.

In South America, two different groups are implementing recycling programs around using cigarette butts in construction projects as well as using mushrooms to create living ashtrays to remediate the cigarette butts. In Kenya, LDIW is deploying portable ash trays and awareness programs.

## Tobacco industry perspective

Globally, Philip Morris International promotes a vision for a “Smoke-free future” and uses assets, such as their trademarked “The World is Not an Ashtray” website, to promote issues related to discarded cigarette butts. Their own objective is to reduce their consumption of plastics by 50%.

On their own site, PMI says: *“As a global manufacturer producing 766 billion cigarettes and heated tobacco units per year, sold across more than 180 markets, PMI is in a position to play an important role with its consumers in littering prevention. Plastic waste from consumables, devices, and packaging sold by PMI amounted in 2019 to 165,000 tons of plastic. The largest share (86 percent) is composed of the bioplastics used in the filters of conventional cigarettes ...”*

***“We support the concept of EPR, provided that the schemes put in place are ecologically and economically efficient and socially acceptable and deliver on the goal of reducing littering.”***

*– Philip Morris International*

## Recycling methods

### *TerraCycle*

TerraCycle is a North American social enterprise and has seemingly been the first to provide a commercial, scaled recycling option for cigarette butt filters.

This sees the cellulose stripped from the plastic filter and combined with other plastics to create a plastic pellet output that can then be sold to companies in North America to make products such as park benches, or even ash trays.

In Australia, TerraCycle offer Zero Waste collection boxes where individuals can purchase and deposit cigarette butts into these boxes in their home or business setting, before dropping the box to an Australia Post outlet. Once shipped to TerraCycle, they are aggregated with several other products and sent to the USA for recycling.

In addition, in some council areas, such as Byron Bay and City of Melbourne, TerraCycle has partnered with infrastructure providers to direct the contents of the serviced cigarette butt bins, for consolidation and sending overseas. The council pays for this service, including infrastructure, servicing and recycling costs.

Given that the filters are shipped overseas, Australia loses the benefit of employment and use of recovered materials. Additionally, whilst TerraCycle have studied the impact and believe that the carbon emissions of the transportation are more environmentally friendly than having the litter in the environment, Australia needs to assess whether this is a viable solution to deal with this litter stream.

Upon engagements with the Australia and New Zealand team, TerraCycle have confirmed that there isn't a consideration to introduce dedicated infrastructure in Australia to support the recycling of cigarette butts. If cigarette butts are now considered under the National Plastics Plan, the Federal Government should consider if they will continue to allow the export of these plastic cigarette butt filters in the future.

## *Cigarette butts as a composite material*

RMIT has engaged in more than 15 years of research which has identified a process, recipe and analysis of using cigarette butts as a composite in construction materials, such as clay fired bricks, asphalt and concrete.

Various options have been explored for the amount and method to use the cigarette butts in building materials.

As Prof. Abbas Mohajerani from RMIT notes in his research:

*During the research, it was concluded that the incorporation of cigarette butts into bricks can be beneficial in two main ways. Firstly, they can effectively solve the issue of litter worldwide as recycled butts can be placed in bricks without any fear of leaching or contamination.*

*Secondly, they are cheaper to produce in terms of energy requirements, and as more cigarette butts are incorporated the energy cost decreases further.*

*Cigarette butt bricks are a potential lightweight construction material, and its uses and properties can vary depending on the quantity of butts incorporated. They can be both loadbearing and nonloadbearing, and some properties can be improved with the incorporation of cigarette butts including a reduction in thermal conductivity.*

*Incorporating as little as 1% cigarette butt content in bricks can be of benefit to the environment. Only 2.5% of the world's annual brick production is necessary to completely offset the worldwide, annual cigarette production. As such, this paper proposes that brick manufacturers produce a small number of bricks with 1% cigarette butts incorporated*

In March 2021, Boral Ltd endorsed two grant applications made by No More Butts to Recycling Victoria. As part of this endorsement, Boral has confirmed that they will deploy a field trial using the research from RMIT to deliver a concrete slab.

Upon a successful field trial to confirm the research in a commercial environment, it is expected that cigarette butts can be considered a source material in future local sustainability projects, including other products, such as bricks, roof tiles and cladding. Once proven, an opportunity exists to scale cigarette butts as a commodity that can be bought or traded between councils and businesses.



## *Myco-cycling*

Mycology is the study of fungi and is an rapidly growing approach to reducing waste and recycling items. No More Butts has identified a Melbourne-based business, who has been progressing research into mycology to treat cigarette butt litter for more than five years. In a controlled environment, it is shown to be effective in the remediation of plastic cigarette butts by removing the toxicity, enabling the end product to be compostable.

The process of recycling waste materials with fungi involves training it to breakdown the hydrocarbon bonds of a specific toxic pollutant or waste material. The waste is recycled and fused together by cultivating the mycelium (the root network) of the fungi, which can be grown into a moulded form. The resulting composite material is lightweight, fire retardant, buoyant and insulating. The process takes 2 months from collection to remediation into a new material.

Work is ongoing to identify the properties of this new material to confirm its use in other products, such as packaging and insulation, which can create a truly circular economy.

As this solution is easily scalable, cost-effective, upon concluding research into the stability of the product and leachate analysis, this could be a commercially scalable solution, with recycling fields in each state, supplied by collection centres/depots.

The City of Kingston (Vic) earlier provided a written endorsement of this project as part of an unsuccessful grant submission.



© Mycelium Made | Reproduced with permission

*Mycelium running. The network is advancing and remediating the cigarette butts.*



© Mycelium Made | Reproduced with permission

*A living ash tray – mycelium consumes cigarette butts in a glass bowl.*

## Packaging

According to Australian tobacco companies, Australia is one of the few countries in the world where cigarette packs are not made from sustainable materials, nor is the packet considered to be recyclable with other paper and cardboard.

No More Butts has had initial contact with Planet Ark and the APCO to request support in discussions to initiate change in packaging design and steps required to implement the ARL.

In the task force, discussions should take place around requirements for sustainable packaging, including the foil insert and the plastic outer as well as the materials of the individual packet.

An ideal outcome would see the packaging made from recycled and recyclable materials and having the ability to show the ARL on the packet. This is likely to require discussions with the Federal Health Department who administer the Tobacco Plain Packaging Act 2011, which currently would not allow for such a label.



CREDIT: Photo: REUTERS

## Revenue generation

### *Federal Government*

Based on the total customs and excise duty reported in the Final Budget Outcome statements for each year (cash receipts), the reported Federal Government revenue from cigarette sales in 2019 was \$12 billion in Australia.

This revenue was projected to rise in 2020/2021, based on a pre-determined price increase. It is important to understand from the Treasury how this revenue is currently allocated across departments and states and if there is an allocation directed towards the Department of Agriculture, Water and the Environment.

Securing just 1% of this amount to support initiatives that protect the environment will have a significant impact on the implementation of an effective Product Stewardship suite of programs including research, awareness, litter reduction, packaging changes, landfill re-direction and recycling.

### *Tobacco companies*

In 2017-2018 BATA had net profits after tax of nearly \$700 million and held 38% of the retail market share. Imperial Brands (formerly ITA) followed in 2<sup>nd</sup> with 31% market share, however had significantly lower net profit of \$31 million, despite having healthy revenues. PML maintained 28% market share and reported a profit of \$113 million.

### *Retailers*

With \$14 billion in retail sales in 2017, this is a significant portion of the retail industry. Before significant increases in pricing from 2015, cigarettes were the leading product category for sales revenue across Australian groceries and supermarkets, as highlighted in **Table 8**.

## Terminology and data

In this document, No More Butts makes some certain assumptions, but due to inconsistencies in data sources unfortunately cannot make representations of scientific fact. It is imperative that through the creation of the task force, Terms and Definitions are agreed on to use as a base for the Tobacco Industry Product Stewardship Scheme in the future.

### *Terminology*

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 technical biodegradable, despite not meeting the global standards.

Further, there are often opposing views on whether a cigarette butt breaks up, or breaks 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.

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.

### *Data and reporting*

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 Clean Up Australia has reported as short a time as 5 years.

As demonstrated earlier, there is little common research that provides facts to highlight total consumed, total littered and total going to landfill.

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



# SECTION 4

**IMPLEMENTATION**

**RECOMMENDATIONS**

**NOMOREBUTTS**



## Task force implementation

No More Butts proposes to facilitate the development of the agenda of the task force and engage industry to design and implement an effective product stewardship suite of activities around product design, packaging, litter prevention, collection and recycling.

### Scope

The products in scope should be identified and prioritised by the appointed task force, but the following should be considered under a future Tobacco Industry Product Stewardship Scheme:

- Filtered cigarettes
- Packaging
- Filters
- Papers
- Lighters
- Vaping and e-cigarette products

### Participation

A task force should be carefully selected to ensure a cross-sectional representation of all groups impacted by the topic. It is important to note that whilst representatives from every major peak state environmental body and environmental organisation will want to participate, a moderated attendance is critical to ensure productive outputs. It is imperative that participants maintain an objective view and welcome collaboration from other participants.

Whilst the tobacco industry has the greatest ability to minimise adverse impacts, other stakeholders (such as retailers and consumers), also play a role. As such, we need a diverse representation. Engaging participants to represent groups where there is a higher index of smokers will assist in styling programs and deliverables that have a greater impact. It is critical that industry appoints the most relevant senior people who are accountable for actions agreed by the task force. Finding participants that have had experience in Product Stewardship programs and circular economy initiatives will be important.

In 2020, No More Butts engaged with representatives of two of the three major Australian tobacco companies to conduct an industry roundtable event to identify key issues and collaborate on initiatives. This approach may be similar in nature to the initiative of a task force. However, with federal government support and funding, it will likely have more urgency and impact and get the right level of engagement.

## Outcomes of the task force

Outcomes need to be based on impactful activities across multiple streams and should include:

- Reduction in direct and indirect costs related to cigarette butt waste across local government
- Amendment of the Tobacco Plain Packaging Act to enable sustainable packaging and the inclusion of the ARL to guide recycling communication
- Creation of opportunities for Australian-made infrastructure to avoid importation of products to address the issue
- Retail availability of Australian-made sustainable butt pockets (portable ash trays)
- Implementation of a national approach and taxonomy for data collection for tobacco related litter
- Funding programs to support innovation and new circular economies, related to cigarette butt research and recycling
- Introduction of a national recycling scheme, which provides an incentive for community to retrieve and return cigarette butts
- Introduction of sorting centres and recycling hubs
- Introduction of a 'return-and-earn' scheme, "Bucks for Butts" to encourage community and smoker collection
- Growth in community projects using cigarette butts as sustainable source material
- Creation of employment opportunities across construction and manufacturing

## KPI guidance

Specific metrics should be set as a result of agreed outcomes, but could include:

- Reduction in litter rates (eg. 50% by 2025)
- Reduction in costs incurred by councils related to cigarette butt litter and waste
- Increase in landfill re-direction rates (eg. reduction of 20% by 2025)
- Increase in number of smoke-free beaches
- Increase in awareness of the environmental impact of littering cigarette butts

## Initiatives and activities for discussion by the task force

Naturally, the agreed principles and outcomes of the task force will drive the implementation plan of TIPSS, however some considerations are listed below:

- Research into alternative materials for cigarette butt filters - Design for Environment (DfE)
- Design and deploy a national smokers survey, to understand behavioural triggers, awareness of cigarette contents and environmental impacts (behavioural)
- National awareness campaigns on the contents of cigarette butt filters and the impact to the environment (similar to the Grim Reaper AIDS campaign, or the TAC Drink Drive campaign)
- Implementation of smoke-free zones (beaches) and designated smoking areas
- Implementation of 'smoke-safe' permits for building and construction sites
- Standardisation of littering fines nationally
- Empowerment of more officers, including parking inspectors, to implement fines
- 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
- Standardisation of approach to infrastructure
- 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

## Funding and Governance

Moderate costs will be incurred for the facilitation of the initial meeting, including venue hire and secretariat services. It would be the expectation that all attendees cover their own costs to attend.

Feasibility studies required to be carried out prior to final implementation would also require funding. A proposed budget can be created by No More Butts during future discussions.

It is proposed that the Federal Government provides funding for these activities until a formal governance structure can be identified.

Once the task force is implemented, a formal governance process would need to be established to ascertain the flow and control of funding for ongoing projects of the task force, or upon the implementation of a TIPSS.

With an estimated \$15.6 billion in federal excise and customs taxation revenue on tobacco products in 2021, there is an opportunity to discuss a provision of one percent of this revenue to be directed to initiatives that reduce the environmental impact of cigarette butt litter.

No More Butts believes that eventually an EPR scheme should be implemented after initial data can be validated. As such, future TIPSS budgets could be funded proportionately by market share of each of the tobacco companies selling in Australia.



## **Initial Meeting**

### *Facilitation*

- Chair - An independent person from a group such as the CoE
- Secretariat services - No More Butts

### *Required participants*

- Minister / Asst. Minister
- Philip Morris
- Imperial Brands
- BATA
- National Plastics Plan / Department of AWE
- Australian Local Government Association
- 1 x EPA or similar peak body
- 1 x Environmental NGO
- A national Waste & Recycling company

### *Optional participants*

Given the nature of purchasing habits by Australians and the current revenues, it should be considered to have additional representation, at least in part from the following groups.

- Retail & wholesale trade industry
- APCO
- Health Department
- Indigenous affairs
- Treasury

### *Meeting date and location*

- A convenient date prior to June 30 2022, with the potential to leverage an existing event with common attendance
- 2-3 hours duration



## *Proposed Agenda*

- Introductions
- Context - National Plastics Plan
- Current state of play
  - Litter rates
  - Landfill rates
  - Environmental impact
  - Profile of Australian smokers
  - Sales and market share of tobacco products
  - Revenue generation
  - National & global initiatives
- Agree on scope and objectives of a Product Stewardship Scheme
- Agree high level principles
- Draft Terms of Reference
- Develop an implementation plan for an effective product stewardship program
- Propose Governance model
- Meeting Cadence
- Next Steps

## *Planned meeting outcomes*

After the products in scope are agreed, the task force needs to agree on high-level principles of the engagement, such as the need to reduce the amount of plastic cigarette butt filters that are currently littered into the environment.

It will need to be established if the focus of the task force should be on source reduction and DfE (ie. reduction or removal of plastics) and/or to focus on the lifecycle of the existing product to ensure litter reduction programs, landfill re-direction, and extension of EOL through circular economy initiatives.

Sources of data and methods to collect future baseline data collection needs to be agreed upon, as does appropriate terminology.

Draft Terms of Reference should be agreed upon to set out the objectives for the a Product Stewardship Scheme.

Finally, funding sources and Governance models need to be discussed, including consideration of allocation of Government Taxation Revenue, or the introduction of an Extended Producer Responsibility (EPR) scheme and how these funds would be managed, including any consultation with Treasury.

If industry chooses to not participate in the task force, alternatives may be discussed, including the request for inclusion of cigarette butts on the priority product list by the Minister for the Environment to help introduce a mandatory stewardship scheme.

# SECTION 5

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 charity, entered into the Register of Environmental Organisations in December 2020.

In August 2020, No More Butts made a submission to 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 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 and across Perth 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.

## 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.”*

# Governance

## Board

Roderic Byrnes (Executive Director)

Samuel Hawkins (Executive Director)

Shannon Mead (Executive Director)

Natalie Pharaoh (Company Secretary)

*We would like to acknowledge Beryl (Lynnette) Mead and Darrell Mead for serving as Non-Executive Directors in the first year of operation until they retired at the 2021 AGM.*

## Public Fund Committee

Roderic Byrnes

Shannon Mead

Natalie Pharaoh

## 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.

## Meetings

Due to COVID, the Board passed most motions as Directors Circular Resolutions. In addition, the Board met five times in 2021.

## Founder's Biography

After an early work history spanning hospitality and entertainment, our CEO - Shannon Mead, forged a successful corporate career over two decades with multi-national companies, including Nokia and Microsoft.

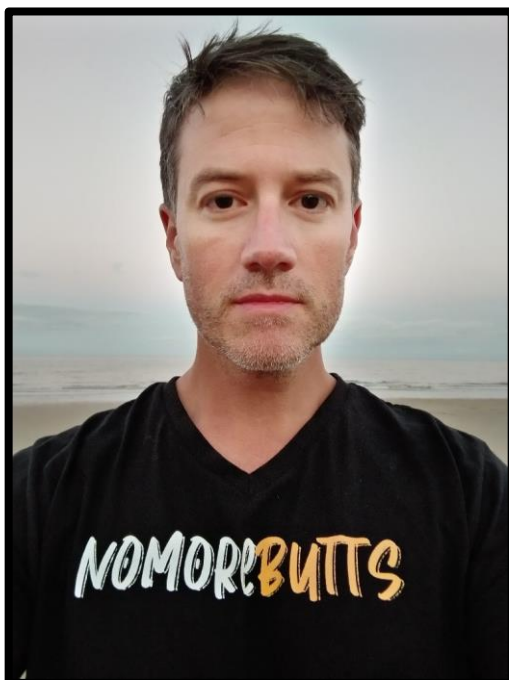
Most recently, Shannon led Commercial Operations & Go-to-market for a global consumer electronics company, accountable for governance, analytics, training, and retail operations across 14 countries in the Asia Pacific region, reporting to the Global Chief Commercial Officer. During his tenure, Shannon held the role of General Manager for Philippines, Singapore, Indonesia and Pacific Islands, living in the three former countries, giving him a greater sense of worldwide impact and cultural understanding.

Prior to joining this company, Shannon led Sales Operations across Australasia for Microsoft Devices after being involved in sales, product management, and training roles with Nokia.

In 2021, Shannon was invited to present at KAB NSW on the topic of cigarette butt litter, considerations for recycling and the importance of democratisation of data.

Along with a team of 10 others, Shannon works as a volunteer in the organisation, as a full-time focus and is an Executive Director.

Shannon was presented with the Cairns Regional Council 2022 Australia Day Awards "Volunteer of the Year" for his efforts with No More Butts.



# Our Volunteer Leadership team

As at 31<sup>st</sup> December 2021



**Rod Byrnes**  
Operations Manager



**Samuel Hawkins**  
Controller



**Natalie Pharaoh**  
Copywriter



**Emma Frampton**  
Legal Counsel



**Aidan Smith**  
Marketing & Communications



**Julie Tkalec**  
Volunteer Coordinator



**Yut Cheng**  
Admin & Analytics



**Deepthy John**  
Accountant

We also acknowledge Mabel Coelho and Emily Crowther for their fantastic assistance as volunteers in the first year of operation.

## 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.



# APPENDIX 1



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**NOMOREBUTTS**

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