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19th December 2022

Committee Secretary

Standing Committee on Climate Change, Energy, Environment and Water
PO Box 6021
Canberra ACT 2600

CCEEW@aph.gov.au

RE: Inquiry into Plastic Pollution in Australia's Ocean and Waterways

Dear Committee Secretariat,

No More Butts appreciates the opportunity to provide evidence to the Standing Committee as part of the Inquiry into Plastic Pollution in Australia's Ocean and Waterways.

[No More Butts](#) was formed to tackle Australia's most littered item: cigarette butts, and has a vision for a 'butt free environment'. We are an ACNC registered charity and are on the Register of Environmental Organisations. Performing multiple functions from research, to being engaged by peak bodies as a consultant in addition to performing pro bono work with councils and other environmental organisations, No More Butts is a subject matter expert on tobacco related waste.

No More Butts has been an active participant in several recent State and Commonwealth consultations and focus groups, including the International Plastic Pollution Treaty and the National Plastic Pollution Portal. Additionally, No More Butts is a member of the UNEP Global Partnership on Plastic Pollution and Marine Litter. We have recently attended virtual meetings of the High Ambition Coalition before and after INC-1, as well as being a regular attendee at WHO FCTC events. In 2022, we have presented on the impact of cigarette butt litter at six conferences, including a poster presentation at the 7th International Marine Debris Conference in Korea.

With at least 120 tonnes of plastic tobacco filters making their way into Australia's oceans and waterways annually, action needs to be taken.

The evidence and proposed actions by No More Butts in response to the Terms of Reference of the Inquiry are detailed in the following pages and summarised as follows:

Proposed actions

In response to the Inquiry, the Committee should consider some, or all, of the following recommendations:

1. Undertake a public consultation on plastic tobacco filters in cigarettes
2. Ensure the round table event initially proposed in the National Plastic Plan is delivered
3. Ensure that the environmental impact of tobacco litter is considered in any future tobacco strategies, by forming a joint departmental task force.
4. Introduce a cigarette butt litter abatement fee
5. Harmonise laws and penalties for littering cigarette butts across Australia
6. Implement bans on smoking cigarettes on all beaches across Australia
7. Deliver a national awareness campaign to help educate Australians of the impact on the ocean created by the littering of cigarette butts

No More Butts is available to appear as a witness in any upcoming hearings into the impact of plastic pollution, in particular tobacco filters. This submission is not confidential, and names do not need to be withheld.

Please don't hesitate to contact me if you wish to discuss any of the proposals or have any further questions about the submission.

Yours faithfully,



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Attachments:

Attachment 1: Letter from Hon Warren Entsch, Federal MP, Leichhardt / ex Special Envoy for the Great Barrier Reef

Attachment 2: Letter from Mr. Michael Healy, State MP, Cairns

Attachment 3: Letter from Byron Shire Council

Appendices:

Appendix 1: [No More Butts' Nomination of cigarette butts for the Minister's Priority List \(link\)](#)

Appendix 2: [No More Butts 2022-23 Pre-Budget Submission \(link\)](#)

Appendix 3: [No More Butts Response to National Tobacco Strategy Draft Consultation \(link\)](#)

cc.

The Hon Tanya Plibersek MP, Minister for the Environment and Water

The Hon Warren Entsch MP, Federal Member for Leichhardt



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The environmental impacts of plastic pollution particularly in oceans and waterways

Made from plastic, cigarette butts are the most littered item in Australia¹. Most recent estimates suggest that up to 8.9 billion cigarette butts are littered into the Australian environment every year².

As EPA NSW notes, they are easily carried in stormwater runoff through drainage systems and eventually to local streams, rivers, and waterways³.

According to au.wales.com⁴, a Local Environment Quality Survey of England 2017/18 showed that 52% of smokers who smoke every day thought putting a cigarette down the drain was acceptable and 39% of smokers admitted to throwing a cigarette butt down a drain within the past month.

In Australia, it has been reported from litter audits that nearly one third of littered cigarette butts make it into our oceans and waterways⁵. Globally, this number is estimated at 40%⁶.

With a plastic filter made from cellulose acetate⁷, cigarette butts are photodegradable⁸, not biodegradable. Tobacco producer, Philip Morris International, notes that it can take up to 15 years for a cigarette butt to break down⁹. During this process, thousands of plastic micro fibres are created¹⁰.

Using the littering rates and the average weight of a cigarette butt¹¹, it can be estimated that at least 120 tonnes of plastic tobacco filters are littered into Australian waterways annually. With 15 years of litter accumulating, nearly 18,000 tonnes of cigarette butts would currently be in our waterways. According to Macedo et al., 2011 and Santos et al., 2005, cigarette butts could accidentally be ingested by some marine species (such as fish, birds, and whales) during feeding. There is also research to suggest they enter our food stream¹².

Additionally, a WHO paper highlights research that has shown that harmful chemicals leached from discarded butts, which include nicotine, arsenic and heavy metals, can be acutely toxic to aquatic organisms¹³.

¹ <https://www.cleanup.org.au/cigarette-butts>

² <https://www.wwf.org.au/ArticleDocuments/353/pub-WWF-Australia-Ending-cigarette-butt-pollution-3Dec21.pdf.aspx>

³ <https://www.epa.nsw.gov.au/your-environment/litter/targeted-programs/reducing-cigarette-butt-litter>

⁴ <https://au.whales.org/2019/05/31/how-cigarette-butts-pollute-the-ocean-and-harm-whales-and-dolphins/>

⁵ <https://www.smh.com.au/environment/conservation/plastic-and-cigarette-butts-make-up-most-of-debris-in-waterways-20180303-p4z2od.html>

⁶ <https://kwit.app/en/blog/posts/cigarette-butts-the-main-source-of-sea-and-ocean-pollution#:~:text=Cigarette%20butts%20a%20major%20source%20of%20pollution%3A%20some%20figures&text=Knowing%20that%20a%20single%20cigarette,0n%20water%20resources%20are%20catastrophic.>

⁷ <https://www.theguardian.com/environment/2022/aug/18/cigarette-butts-how-the-no-1-most-littered-objects-are-choking-our-coasts>

⁸ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2697937/>

⁹ <https://www.worldnoashtray.com/en/be-aware/>

¹⁰ <https://www.sciencedirect.com/science/article/pii/S0048969721034550#:~:text=Another%20problem%20brought%20about%20by,released%20in%20the%20water%20environment.>

¹¹ <https://www.worldnoashtray.com/en/cigarette-butt-littering-information.html>

¹² <https://www.sciencedaily.com/releases/2016/07/160707083024.htm>

¹³ <https://www.sciencedaily.com/releases/2016/07/160707083024.htm>

The cost of cleaning up cigarette butt litter is estimated at \$73.3 million annually¹⁴, which is taken from Australian council and government agency budgets, with rate payers currently footing the bill. A report prepared by The Centre for International Economics has separately identified that there is a Willingness to Pay by residents of NSW, Queensland and Victoria of \$119 million annually to eliminate cigarette butt litter¹⁵.

With over 7,000 chemicals¹⁶ and research showing that each butt can contaminate up to 40 litres of water¹⁷, a San Diego State University suggested that the chemicals leached from one smoked cigarette butt were capable of killing half of the fish present in a one-litre bucket of water¹⁸.

The impacts to our waterways and ocean are greater than just plastic pollution. Based on the amount littered in Australian waterways, it is estimated that nearly 119 billion litres of water are polluted annually by toxic cigarette butts.

With declining water quality and marine debris both being listed as threats in the 2019 Outlook Report for the Great Barrier Reef¹⁹, now is the time to take action on plastic tobacco filters.

Proposed action

- *Undertake a public consultation on plastic tobacco filters in cigarettes.*

Case study

In early 2022, the UK DEFRA initiated a public consultation around the inclusion of tobacco filters in cigarettes²⁰. No More Butts recommends that Australia undertakes a similar consultation.

¹⁴ <https://www.wwf.org.au/ArticleDocuments/353/pub-WWF-Australia-Ending-cigarette-butt-pollution-3Dec21.pdf.aspx>

¹⁵ <https://www.epa.nsw.gov.au/publications/litter/willingness-to-pay-for-reduced-litter-and-illegal-dumping>

¹⁶ <https://www.aihw.gov.au/reports-data/behaviours-risk-factors/smoking/overview>

¹⁷ <https://au.whales.org/2019/05/31/how-cigarette-butts-pollute-the-ocean-and-harm-whales-and-dolphins/>

¹⁸ https://newscenter.sdsu.edu/sdsu_newscenter/news_story.aspx?sid=71209

¹⁹ <https://www.dccew.gov.au/sites/default/files/documents/reef-2050-long-term-sustainability-plan-2021-2025.pdf>

²⁰ <https://consult.defra.gov.uk/environmental-quality/call-for-evidence-on-commonly-littered-and-problem/>

The effectiveness of Australia's plastics management framework under the National Plastics Plan and related policies to reduce plastic pollution particularly in oceans and waterways

On March 4th 2021, Trevor Evans, the former Assistant Minister for Waste Reduction and Environmental Management, along with Sussan Ley, as Federal Minister for the Environment, announced that, as part of the [National Plastics Plan 2021](#), an action would be taken to address the issue of plastics in cigarette butt filters.

Specifically, Action 4 noted that the Australian Government would initiate an industry-led, cross-sectoral stewardship task force to reduce cigarette butt litter in Australia, and consider potential stewardship schemes.

In late June 2022, No More Butts spoke with several Department representatives who advised that due to considerations under Article 5.3 of the WHO Framework Convention for Tobacco Control (FCTC), the approach to the formation of the task force may need to be reconsidered. In December 2022, after being prompted for an update to share in this submission, the same representatives confirmed that there hasn't been any progress on Action 4.

It may also be important to note that tobacco filters were not included in the [2018 National Waste Policy](#) despite being able to help deliver key priorities under the [National Waste Policy Action Plan 2019](#), specifically in addressing Target 5, which is to phase out problematic and unnecessary plastics by 2025.

Removing filters would also assist in the achievement of Target 2 to reduce total waste generated by 10% per person by 2030. Recommendations would also go towards addressing threats highlighted in the Reef 2050 Plan around water quality and marine debris.

If plastic filters remain in cigarettes, initiatives should be put in place to restrict cigarette butt litter and create a supply chain for the collection. These actions would go towards Target 3 to recover 80% of all waste by 2030. In this case, cigarette butt filters should be considered in the list of eligible products for the [Recycling Modernisation Fund](#). Exports should also be formally regulated under the [Recycling and Waste Reduction Act 2020](#). Further, the use of filters in [Products made with recycled content](#) would help address Target 4 of the National Waste Policy Action Plan 2019. Research can be validated through potential [Cooperative Research Centres Project Grants](#).

Proposed action

- *Ensure the round table event initially proposed in the National Plastic Plan is delivered. It is recommended that the tobacco industry is excluded from this event. No More Butts is available to provide support in the delivery of this action.*

The effectiveness of the Australian Government's engagement with states, territories, industry and non-government organisations to reduce plastic pollution particularly in oceans and waterways

Relating to the issue of taking action to reduce plastic pollution in our waterways caused by the most littered item, cigarette butts, there has been limited engagement from the Australian Parliament Ministry and the Department (DCCEEW).

Over the past two years, Department representatives have provided reactive updates that they have been waiting for actions from overseas and domestic departments, or have been focussed on other priorities. Whilst competing priorities are well understood and appreciated, decisive action could have helped prevent thousands of tonnes of plastic pollution entering our waterways and poisoning our water. As other Action items have been, Action 4 could have been delegated to an independent subject matter expert to investigate and implement.

It may also be relevant to highlight that there appears to have been limited collaboration between the Commonwealth Environment and Health departments on Tobacco legislation historically. Evidence of this includes the environment initially not being considered in any proposed changes to tobacco legislation, or in the National Tobacco Strategy.

It should be highlighted that despite best intentions and significant funding through Australian grants, litter reports would suggest there has been limited to no positive impact on the level of plastic pollution in our waterways, especially that caused by plastic tobacco filters.

The lack of consistent smoking and littering laws across Australian States and Territories also make it difficult for enforcement, as well as education, which results in the continuation of hundreds of tonnes of tobacco filters ending up as plastic pollution in our waterways.

Proposed actions

- *Ensure that the environmental impact of tobacco litter is considered in any future tobacco strategies, by forming a joint departmental task force.*
- *Harmonise laws and penalties for littering cigarette butts across Australia*
- *Implement bans on smoking cigarettes on all beaches across Australia*

The effectiveness of community campaigns to reduce plastic pollution particularly in oceans and waterways and encourage the use of alternative materials

As the most littered form of plastic pollution, if we review cigarette butts specifically, there have been limited community campaigns that have been shown to reduce the amount of pollution heading into our waterways and oceans.

Several smokers still claim that they are not aware that cigarette butts are made from plastic. As such, there is not a conscious awareness that they are littering, when they discard their used cigarette butt onto the ground, into a garden, or down the drain. Smokers who don't consider their cigarette to be litter are more than three times likely to litter it²¹.

In September 2022, No More Butts, in partnership with Clean Up Australia and Cairns Regional Council, held an inaugural Big Cigarette Butt Hunt, attracting several participants, significant media coverage and saving thousands of filters and several kilograms of plastic pollution from entering the waterways, including the Great Barrier Reef. The work that Clean Up Australia continues to do to raise awareness and conduct clean up events year round also has a positive impact on the amount of pollution recovered before it enters our waterways.

It has been shared with No More Butts that some clean up groups have stopped collecting and reporting on cigarette butts due to the sheer number they come across and the corresponding drain on volunteer hours to collect them and record them. They have also preferred to focus on reporting items such as more well-known single-use plastic items, as well as container deposit schemes.

There has also been inconsistency in reporting structure, with cigarette butts often being reported under consumer items, or other. This should be rectified through the new Plastic Pollution Portal.

Other environmental groups, including Positive Change for Marine Life, Keep Australia Beautiful and Byron Bay Council have deployed their own programs around infrastructure, awareness and even recycling, however the impact and awareness is generally limited to the LGA they are deployed in. Even novel ideas deployed around voting boxes have limited exposure and success is again often only seen in the immediate area.

The NSW EPA runs a series of grants annually to provide funding to groups to help with installation, monitoring and awareness programs. They have also prepared assets and a library of resources to help LGAs and NGOs to tackle cigarette butt litter. Again, these are restricted due to the amount of funding available.

However, with 8.9 billion cigarette butts being litter every year, the efforts of community clean up groups can not tackle the enormity of this issue.

To date, whilst there has been coordinated action around the health impacts of smoking, there has yet to be a national awareness campaign around the environmental impact of cigarette butts as a form of plastic pollution.

²¹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3397372/>

Proposed action

- *Deliver a national awareness campaign to help educate Australians of the impact on the ocean created by the littering of cigarette butts*

A coordinated national approach needs to be taken to address this issue. A national campaign would focus on the impacts of litter on the environment, in particular Australia's oceans and waterways, including the Great Barrier Reef. With two threats to the Reef being listed as water quality and marine debris, a focus on Reef catchment areas is extremely important.

As a comparison for the budget, the Federal Government advertising budgets for Defence Recruitment and COVID response (Health and Treasury) were \$32m and \$64.5m in the 2020-21 financial year respectively²².

As a registered charity dedicated to this initiative, No More Butts is able to facilitate the deployment of this campaign with appropriate consultation and support from the Department of Climate Change, Energy, Environment and Water.

²² <https://www.finance.gov.au/sites/default/files/2022-01/campaign-advertising-by-australian-government-departments-and-agencies-report-2020%E2%80%9321.pdf>

Global initiatives underway to reduce plastic pollution particularly in oceans and waterways

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

In May this year, the WHO articulated their view that there is no evidence that filters provide any health benefit to consumers and should be banned²³. This supports the position from No More Butts that tobacco filters are a problematic and unnecessary single use plastic and should be banned.

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

Similar to Australia, most countries have fragmented approaches to public smoking laws, but Miami has recently passed a law banning public smoking in parks and on beaches.

In February 2022, UK DEFRA closed submissions for their consultation into plastic tobacco filters. The EU recently implemented a “filter contains plastic” label on sales of all cigarette packets, helping to increase awareness of the potential impact of the smokers’ decision to litter their butt after finishing their cigarette.

San Francisco has a history of collecting litter taxes from retailers, along with charging tobacco companies for the cost of cleaning up, charging retailers 1.05 USD per packer of cigarettes sold, which is ultimately passed on to the consumer.

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

Proposed actions

- *Undertake a public consultation on plastic tobacco filters in cigarettes*
- *Ensure participation from environment representatives in tobacco legislation reviews to ensure the environmental impact is considered in the deployment of any new tobacco strategies, such as packaging and retail reporting*
- *Harmonise laws and penalties for littering cigarette butts across Australia*
- *Implement bans on smoking cigarettes on all beaches across Australia*

²³ <https://www.who.int/news/item/31-05-2022-who-raises-alarm-on-tobacco-industry-environmental-impact>

Other relevant matters

Establishment of a Tobacco Waste Fund to enable a structured proportionate allocation of funding for costs associated with the prevention and cleaning of tobacco related waste in LGAs

If it is not seen as an immediate, nor easily implementable action to ban plastic tobacco filters, the Australian Government could choose to implement any of a variety of methods to raise awareness of the impacts of littering on our waterways and also remove the burden of the costs associated with the plastic pollution caused by cigarette butts.

There are three main funding options:

1. Implement a Litter Abatement Fee, chargeable to all retailers that sell cigarettes
2. Charge a fee to the tobacco Industry companies to offset the cost of cigarette butt litter. This could be in line with tobacco importation and/or retail sales
3. Allocate 1% of the revenue raised from federal tobacco excise and duties, which is currently funnelled into consolidated revenue.

The current cost of litter can be estimated between \$73.3 million and \$100 million annually²⁴ and does not include the environmental impacts of littering, or waste disposal. This cost is currently unfairly absorbed by LGAs and ratepayers. In fact, ratepayers along the eastern seaboard have said they would be willing to pay nearly \$120 million annually to eliminate waste.

By creating a funding mechanic for environmental initiatives, this would ensure that only those that consume the product would be subject to costs associated with it. This could free up financial resources within LGAs. With awareness campaigns and upcycling initiatives, the cost of litter would reduce over time.

A fund could be accessed for include dedicated clean up events, project management, local awareness programs, installation and servicing of dedicated infrastructure, and for a portion amount of overall waste management costs.

State and local governments could apply for funding and grants, based off a schedule of approved activities that would have maximum impact and support the national awareness campaign.

The Trust Fund could be managed by DCCEEW or by delegation to a new Authority, similar to GRBMPA.

²⁴ <https://ndri.curtin.edu.au/ndri/media/documents/publications/T273.pdf>

Provide funding for further research into circular economy initiatives related to resource recovery and productization of cigarette butt filters

As cigarette butt filters are made of plastic, this creates opportunities for the recycling, or upcycling, of cigarette butts. Research is a critical step to identifying circular initiatives for this pervasive product.

A global social enterprise already has a commercially scaled model based in America.²⁵ They process the cellulose to a stage where it can be sold as a low-grade plastic, which can be used in the creation of new plastic materials, such as park benches and ashtrays.

An Australia company created a prototype plastics mixer, however they have sent this to Europe, although they are planning to license this technology within Australia.²⁶

RMIT in Australia has over 15 years of research to consider shredded cigarette butts as a composite material in clay-fired bricks.²⁷

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.²⁸

In 2021, No More Butts received an endorsement from a large Australian construction supply company to trial using cigarette butts as a composite material for 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.

In 2022, No More Butts worked with students at RMIT on three projects to look at alternative uses for cigarette butt waste. There is provisional research on using activated carbons from cigarette butts in CO2 capture, uranium removal, and soil remediation (bio char).²⁹ An open, competitive grant scheme would see the awarding of feasibility studies, pilots and implementation programs until adequate stream(s) can be commercialised. Outcomes of the research projects will support the objectives of sustainable procurement, re-manufacturing, recycling modernisation and waste export bans.

²⁵ <https://www.terracycle.com/en-US/brigades/cigarette-waste-recycling>

²⁶ <https://plastechrecycling.com/product-development/>

²⁷ <https://www.rmit.edu.au/news/media-releases-and-expert-comments/2020/sep/cigarette-butt-bricks>

²⁸ <https://wollongong.nsw.gov.au/my-community/news-and-alerts/news/news/2021/november-2021/how-to-train-your-oyster-mushroom-no-really>

²⁹ https://www.gjesm.net/article_244343_fcde85da8dee9e3596e05af2c0a3322b.pdf

Resources

This submission and the recommendations contained within this document may need to be read in conjunction with:

[*Tobacco Excise Rates*](#)

[*Competition and Consumer \(Tobacco\) Information Standard 2011*](#)

[*Tobacco Advertising Prohibition Act 1992*](#)

[*Tobacco Advertising Prohibition Regulation 1993*](#)

[*Tobacco Plain Packaging Act 2011*](#)

[*Tobacco Plain Packaging Regulations 2011*](#)

[*Trade Practices \(Consumer Product Safety Standard\) \(Reduced Fire Risk Cigarettes\) Regulations 2008*](#)