



5<sup>th</sup> January 2023

**Ref:** UNEP-INC-2022-0005

**Executive Secretary**

International Negotiating Committee on plastic pollution  
United Nations Avenue, Gigiri  
PO Box 30552 - 00100, Nairobi, Kenya

By email: [unep-incplastic.secretariat@un.org](mailto:unep-incplastic.secretariat@un.org)

**Re:** Written Submission from No More Butts Ltd

Dear Secretariat,

No More Butts appreciates the opportunity to provide a submission to the INC on plastic pollution.

[No More Butts](#) was formed to tackle the most littered item in the world: cigarette butts. Our vision is for a 'butt free environment'. Performing multiple functions from research, consulting to peak bodies 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.

As a registered environmental charity in Australia, 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 an attendee at WHO FCTC virtual events. In 2022, we have presented on the impact of cigarette butt litter at six conferences, including a virtual poster presentation at the UNEP 7<sup>th</sup> International Marine Debris Conference in Korea. Recently, we have engaged with Action on Smoking and Health (ASH) and the Stop Tobacco Pollution Alliance (STPA) in preparation for INC submissions.

Name of organization (for observers to the committee)	No More Butts Ltd
Contact person and contact information for the submission	Mr. Shannon Mead (Founder / CEO) <a href="mailto:shannon@nomorebutts.org">shannon@nomorebutts.org</a>
Date	5 <sup>th</sup> January 2023

**I. Substantive elements**

**1. Objective(s)**

*Proposed Objective(s):*

1. The elimination of plastic pollution in all environments
2. Removal of toxic and unnecessary single-use plastics, including tobacco filters
3. Sustainable production and consumption of necessary plastics

*Explanatory Text:*

It is important to be bold, clear and concise with the objective(s). We cannot simply aim to reduce plastic pollution. We need to ensure a way forward for the recovery and treatment of existing plastic pollution and put in measured steps around design, awareness, waste management and source reduction to prevent future mass pollution from occurring. This should include all terrestrial and marine environments.

Ubiquitous plastic considered both toxic and unnecessary should be phased out at an accelerated rate with adherence globally and without interference from industry players. A key example of this are plastic tobacco filters found almost exclusively in all cigarettes globally.

Necessary plastics without alternatives, such as those required in medical procedures need to be considered carefully, with End of Life being carefully considered at the design phase.

**2. Core obligations, control measures and voluntary approaches**

Voluntary measures encouraged or led by industry rarely have the same positive outcomes as they are generally reliant on flexible cost structures and timelines designed to benefit the industry.

The World Health Organization (WHO) Framework Convention for Tobacco Control (FCTC) Article 5.3 should be considered when reviewing appropriate control measures for engaging with industry across elements throughout the whole life cycle of necessary plastics. This limits the engagement from industry when identifying solutions to address the problem.

Transparent reporting and commitments in writing from any industry players should be considered mandatory if there is engagement, as a form of obligation.

## **II. Implementation elements**

### **1. Implementation measures**

Similar to the FCTC, signatories must ensure adherence to the agreed instrument and accelerate actions where possible to meet a high ambition.

Single-use plastic bans on unnecessary and toxic plastics (such as tobacco filters) should be harmonized and accelerated as a priority.

National reporting frameworks, with aligned classes and codes for pollution reporting are key. Alignment of codes across all geographies, using a common data model is important to measure the baseline and future success of plastic pollution. Tools such as the GPML Data Hub could be used, or the Australian National Plastic Pollution Portal.

Similar to the WHO FCTC Guidelines for the Implementation of Art 5.3 noting that “there is a fundamental and irreconcilable conflict between the tobacco industry’s interests and public health policy interests”, the INC should consider the vested interests of industry players. Appropriate obligations, ensuring compliance will be key to ensure the observation and moderation of the industry.

### **2. Means of Implementation**

Financing is key in treaty implementation. Signatories should consider levies and taxation encouraged under the WHO FCTC as a source of funding, which would not only generate funding, but would also be reasonably expected to reduce consumption of tobacco products.

### III. Additional input

#### 1. Prioritisation on the ban of tobacco filters

Made from plastic, cigarette butts are the most littered item globally<sup>1</sup>. Estimates suggest that up to 4.5 trillion cigarette butts are discarded into the environment every year<sup>2</sup>. They are easily carried in stormwater runoff through drainage systems and eventually to local streams, rivers, and waterways<sup>3</sup>.

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<sup>4</sup>. Globally, it has been reported that 40% of discarded cigarette butts make it into our oceans and waterways<sup>5</sup>.

With a plastic filter made from cellulose acetate<sup>6</sup>, cigarette butts are photodegradable<sup>7</sup>, not biodegradable. Tobacco producer, Philip Morris International, notes that it can take up to 15 years for a cigarette butt to break down<sup>8</sup>. During this process, thousands of plastic micro fibres are created<sup>9</sup>.

Using the littering rates and the average weight of a cigarette butt<sup>10</sup>, it can be estimated that at least 350 thousand tonnes of plastic tobacco filters end up in waterways globally each year. With 15 years of litter accumulating, up to 5.3 million tonnes of cigarette butts could 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 stream<sup>11</sup>.

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 organisms<sup>12</sup>. With over 7,000 chemicals<sup>13</sup> and research showing that each butt can contaminate up to 40 litres of water<sup>14</sup>, 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 water<sup>15</sup>.

The impacts to our waterways and ocean are greater than just plastic pollution. Based on the amount expected to end up in our waterways, it is estimated that nearly 72 quadrillion litres of water are polluted annually by toxic cigarette butts.

---

<sup>1</sup> <https://environmentjournal.online/articles/an-estimated-4-5-trillion-cigarettes-are-thrown-away-each-year/>

<sup>2</sup> Ibid.

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

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

<sup>5</sup> <https://kwit.app/en/blog/posts/cigarette-butts-the-main-source-of-sea-and-ocean-pollution/>

<sup>6</sup> <https://www.theguardian.com/environment/2022/aug/18/cigarette-butts-how-the-no-1-most-littered-objects-are-choking-our-coasts>

<sup>7</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2697937/>

<sup>8</sup> <https://www.worldnoashtray.com/en/be-aware/>

<sup>9</sup> <https://www.sciencedirect.com/science/article/pii/S0048969721034550>

<sup>10</sup> <https://www.worldnoashtray.com/en/cigarette-butt-littering-information.html>

<sup>11</sup> <https://www.sciencedaily.com/releases/2016/07/160707083024.htm>

<sup>12</sup> Ibid.

<sup>13</sup> <https://www.aihw.gov.au/reports-data/behaviours-risk-factors/smoking/overview>

<sup>14</sup> <https://au.whales.org/2019/05/31/how-cigarette-butts-pollute-the-ocean-and-harm-whales-and-dolphins/>

<sup>15</sup> [https://newscenter.sdsu.edu/sdsu\\_newscenter/news\\_story.aspx?sid=71209](https://newscenter.sdsu.edu/sdsu_newscenter/news_story.aspx?sid=71209)

## **2. Triple Planetary Crisis**

Pollution is one element of our Triple Planetary Crisis, which is largely driven by unsustainable production and consumption. It is important for the INC to consider alignment with the UN Sustainable Development Goals, ensuring health-focused outcomes are considered, in addition to environmental outcomes. Consideration for economic, gender and cultural factors must also be included.

## **3. Leveraging expertise from players not connected to Industry**

NGOs and researchers, such as No More Butts, ASH, STPA and others should be called upon to provide additional information when considering the elimination of various forms of plastic pollution, such as tobacco filters.