

NOMOREBUTTS

IGNITING A NEW SCHEME:

EXTENDED GUIDE FOR NOMINATING

CIGARETTE BUTTS

FOR THE MINISTER'S PRODUCT STEWARDSHIP

LIST OF PRIORITY PRODUCTS

December 2021



Purpose of this Document

The purpose of this document is to enable individuals, businesses and organisations who are passionate about reducing the environmental impact of cigarette butts to provide a formal nomination, without needing to undertake the extensive research required to formulate a detailed response.

This document provides a comprehensive step-by-step guide on how to access and complete a nomination for cigarette butts to be included in the Minister's list of priority products for product stewardship for 2022 – 2023.

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.

Where available, references have been included in the Appendix. They have not, however, been referenced in the responses to the formal questions as the intention is for the reader/nominator to copy/paste the responses found within this document into an online field with limited characters.

Step 1 (optional)
Read Guide

Step 2
Letter of Support

Step 3
Register

Step 4
Start submission

Step 5
Paste submission



Executive Summary

Cigarette butts are the most littered item in Australia¹.

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

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

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

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

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

If 1% of the 2022-23 projected revenue from tobacco was set aside from the federal budget, an initial fund of more than \$150 million⁸ would enable significant and swift action of stewardship initiatives in a coordinated, national approach. This would pave the way for producer responsibility in future budgets.

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 4th 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.

As of December 2021, no further action has been documented, although No More Butts understands action may be taken early in the calendar year, which may be before the 2022-23 Priority List is announced in June 2022.



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

Minister's 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.”

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

As per the website, “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.”

It is recommended that people considering a submission read the [Nomination Guide](#).

The link to make a nomination for the Minister's product stewardship priority list nominations is: https://haveyoursay.awe.gov.au/ministers-product-stewardship-priority-list-nominations/survey_tools/ministers-product-stewardship-priority-list-nominations

Submissions close at **5pm on 17 December 2021**.

Nominator

Question 1. Your name

Answer: Enter your own **name**.

Question 2. Your email address

Answer: Enter your own **email address**.

Product or Material

Question 3. Briefly describe the product or material you are nominating for inclusion on the Minister's priority list.

Provide a concise definition of the scope of the product or material (e.g. all textiles or only clothing textiles).

Answer:

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.

Product or Material

Question 4. 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).

Answer:

- 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

Question 5. 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.

This could include a supporting letter, demonstrated documented commitment and / or setting of targets etc.

Answer:

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.

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.

Question 6. Upload a document to support your answer.

Answer: Attach the endorsement letter from No More Butts, which can be downloaded [here](#).

Reasons for Listing

Question 7. 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.

Answer:

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.

Question 8. 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]:

Answer: Please check all three boxes.

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

Question 9. Provide evidence of how this applies in relation to the product or material

Answer:

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

-> Question 9 (cont.) – do not include this text

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.

Reasons for Listing

Question 10. 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?

Answer:

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.

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.

Proposed actions and timeframes

Question 11. *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?*

Focus mainly on actions that are ready or near ready to be implemented at scale. Include outlines of action that needs to be taken in the medium to long-term – if relevant. If possible, draw on international examples.

Answer:

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

-> *Question 11 (cont.) – do not include this text*

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

Question 12. 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?

Consider whether the technology / action to be applied is available at scale, the actions are economically viable to do, the ease of implementing the proposed actions.

Answer:

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

Question 13. 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.

Answer:

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

Question 14. 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.

Answer:

Around the world, there is growing momentum for product stewardship and extended producer responsibility schemes for cigarette butts and tobacco products. Across Europe, as well as in California, The Netherlands, and Canada, programs of varying degrees are already being implemented. New Zealand announced their Smokefree Aotearoa 2025 Action Plan on 9th December 2021.

The EU has 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

Question 15. *How will outcomes be measured, and the achievement of targets be demonstrated?*

Examples include how values will be measured before, during and after the actions are undertaken; demonstration of cessation of action or use of product or material, or increased action or use of product or material.

Answer:

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

Question 16. 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](#).

Answer:

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

Question 17. *What adverse environmental and health impacts may the proposed action have – if any?*

For example, the creation of derivative hazardous substances, increasing net greenhouse gas emissions and/or negatively impacting energy and water resources or biodiversity.

Answer:

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 mycocycling 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

Question 18. Is your response confidential?

Answer: Submitter to decide. No More Butts opted for **no**.

Question 19. Do you agree to your response being published on our website?

Answer: Submitter to decide yes or no. No More Butts opted for **yes**.

Question 20. Please de-identify my response

Answer: Submitter to check yes or leave blank. No More Butts opted to leave blank.

Question 21. Confirm that you have read and understand this declaration.

Answer: Submitter to check box to agree.

Question 22. Confirm that you have read and understand this declaration.

Answer: Submitter to check box to agree.

APPENDIX



NOMOREBUTTS



ABN: 48 641 916 903

7th December 2021

To: Hon Sussan Ley MP, Minister for the Environment

CC: Hon Trevor Evans MP, Assistant Minister for Waste Reduction and Environmental Management

Ref: Minister's product stewardship priority list nominations

On the assumption that this document has been included as an attachment to support a nomination for **cigarette butts** to be included as a priority product for product stewardship in 2022-23, we are happy for this Letter of Support to be utilised by the organisation making the submission. We consent to it being publically available and/or published. Please formally consider this letter as a Letter of Support for this individual submission to nominate **cigarette butts** as a product for the 2022-23 Minister's Priority List.

Cigarette butts are the most littered item in Australia. Being sold in all states, they are made from a plastic filter, which can contain thousands of toxic chemicals, some known to be hazardous, which can leach into the environment.

With the ability to divert plastic landfill, introduce more recycled content programs and reduce litter of this toxic product by 50% by 2025, this product meets the criteria for selection and is ready to assist in addressing the National Waste Policy.

In addition to ongoing communications and discussions that No More Butts has been having with your office(s), No More Butts has been engaging across industry partners, peak bodies, NGOs, LGAs and other State and Federal departments to provide feedback and solutions to address the problem of cigarette butt litter in Australia. This includes providing an overview of successful programs and updates from across the globe and recommendations for action in Australia.

No More Butts also believes that there should be a coordinated, national effort in relation to all other waste streams relating to smoking, such as packaging and vaping devices and products, including both nicotine and non-nicotine delivery systems.

Based on the support received, Australia is ready to implement activities guided under a mandatory or co-regulatory product stewardship framework. No More Butts is positioned to design, facilitate and lead any programs, including provision of consultation and secretariat services for the government.

If you have any queries on the nomination, our support, or the initiatives and support that No More Butts can offer, please don't hesitate to contact me.

Yours faithfully,



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Australian Government
Department of Agriculture,
Water and the Environment

Guidance on nominating products for the Minister's product stewardship priority list



Background

Product stewardship activities support environmentally sound management of products and materials over their whole lifecycle. Those who import, design, produce, sell, use, dispose of and repurpose products have a shared responsibility to better manage the environmental and human health impacts of products and material streams.

Each year the Australian Minister for the Environment releases a product stewardship priority list in accordance with the *Recycling and Waste Reduction Act 2020*. The Minister's priority list identifies products and materials for which the Minister expects industry to take product stewardship action. It outlines the reasons a product or material has been listed, the actions required and the time frames for industry to lead action. If there is insufficient action in response to the listing of a product or material, the Minister may pursue co-regulatory or mandatory regulatory measures.

To update the Minister's priority list each year (Figure 1) we:

- (a) review already listed products and materials to determine whether they need to stay on the list (products may be removed when sufficient action has been taken, or if a decision has been made to regulate or co-regulate them), and
- (b) consider nominations for products and materials to be added to the list.

Figure 1 - Steps to prepare the Minister's priority list

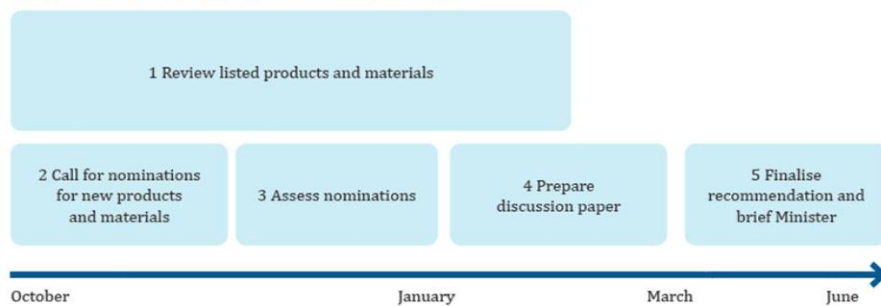


Image of Guidelines (page 2)

Your nomination

There are several things to consider when preparing your nomination for a product or material to be added to the Minister's priority list:

- Nominations must include:
 - a reason for listing the product or material
 - product stewardship actions that will provide environmental, social and health benefits
 - time frames for those actions.
- Actions must contribute to either (or both):
 - Australia's domestic targets (e.g. waste targets in the National Waste Policy Action Plan 2019)
 - Australia's international commitments (e.g. for climate change, fair work practices, biodiversity).
- Nominations may include proposed target(s) for the product, such as a percentage reduction in waste being sent to landfill.
- Listed products and materials must be sold in more than one state or territory.
- At least one of the following must apply:
 - The product or material contains hazardous substances
 - There is 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 potential to significantly reduce the impact that the material or product (or substances in it) has on the environment or on the health or safety of humans.

Criteria for assessing nominations

We assess each nomination based on how well it meets the following criteria:

1. **Definition** – A clear definition of the product or material and what it includes and does not include (e.g. clothing textiles, not all textiles).
2. **Proposed target(s)** – Achievable and measurable target(s) that provide beneficial product stewardship outcomes.
3. **Interest for change** – Clear indications that an industry, a consumer and / or government body or bodies are willing and able (i.e. has capacity and resources) to lead, embrace and drive change.
4. **The reason the product or material should be prioritised** – The potential to improve product stewardship outcomes for the product or material.
 - a. An estimate the scale of use of the product or material and its current impact on the environment and health.
 - b. Evidence demonstrating the extent of adverse environmental and health impacts currently resulting from the manufacture, use and disposal of the product or material.

- c. Evidence demonstrating whether the adverse impacts occur in Australia and/or whether they are a result of imported products, materials or substances making up the product or material.
- d. Evidence of the potential to improve product stewardship outcomes and reduce adverse environmental and health impacts.

5. Actions

- a. Identification of the stages in the lifecycle of the product or material where action can improve product stewardship outcomes.
- b. Description of the actions required for product stewardship benefits (e.g. change of materials in design and manufacture, recovery of material, improved efficiencies in use of water and energy resources, reductions in greenhouse gas emissions).
- c. Evidence demonstrating that actions have a waste avoidance focus that is aligned with circular economy principles (e.g. designing out waste and pollution from the outset).
- d. Inclusion of positive lessons from examples of good product stewardship action in other countries, if relevant.
- e. An estimate of the ease and scale of adoption of each proposed action (e.g. whether technology is ready and available at scale, whether action could be economically viable, whether action is easy to implement).
- f. Identification of potential knowledge and technology gaps and barriers that may delay actions across the sector, and recommendations as to how to address them.

6. Impacts

- a. Approach(es) to measure and report on progress toward environmental and health benefits as a result of the proposed actions.
- b. An estimate, based on evidence, as to how the proposed actions will contribute to Australia meeting its domestic and international environmental targets and commitments (e.g. waste, climate change).
- c. Consideration as to whether including the product or material on the list is likely to instigate or achieve the desired product stewardship outcomes – as opposed to these outcomes being likely to occur regardless of the listing.
- d. Evidence to determine whether the impact of the proposed actions will have other adverse impacts (e.g. create derivative hazardous substances, increasing net greenhouse gas emissions, negatively impacting energy and water resources).
- e. Evidence to demonstrate that the proposed reasons, targets and actions are an important public matter that needs addressing.



References

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