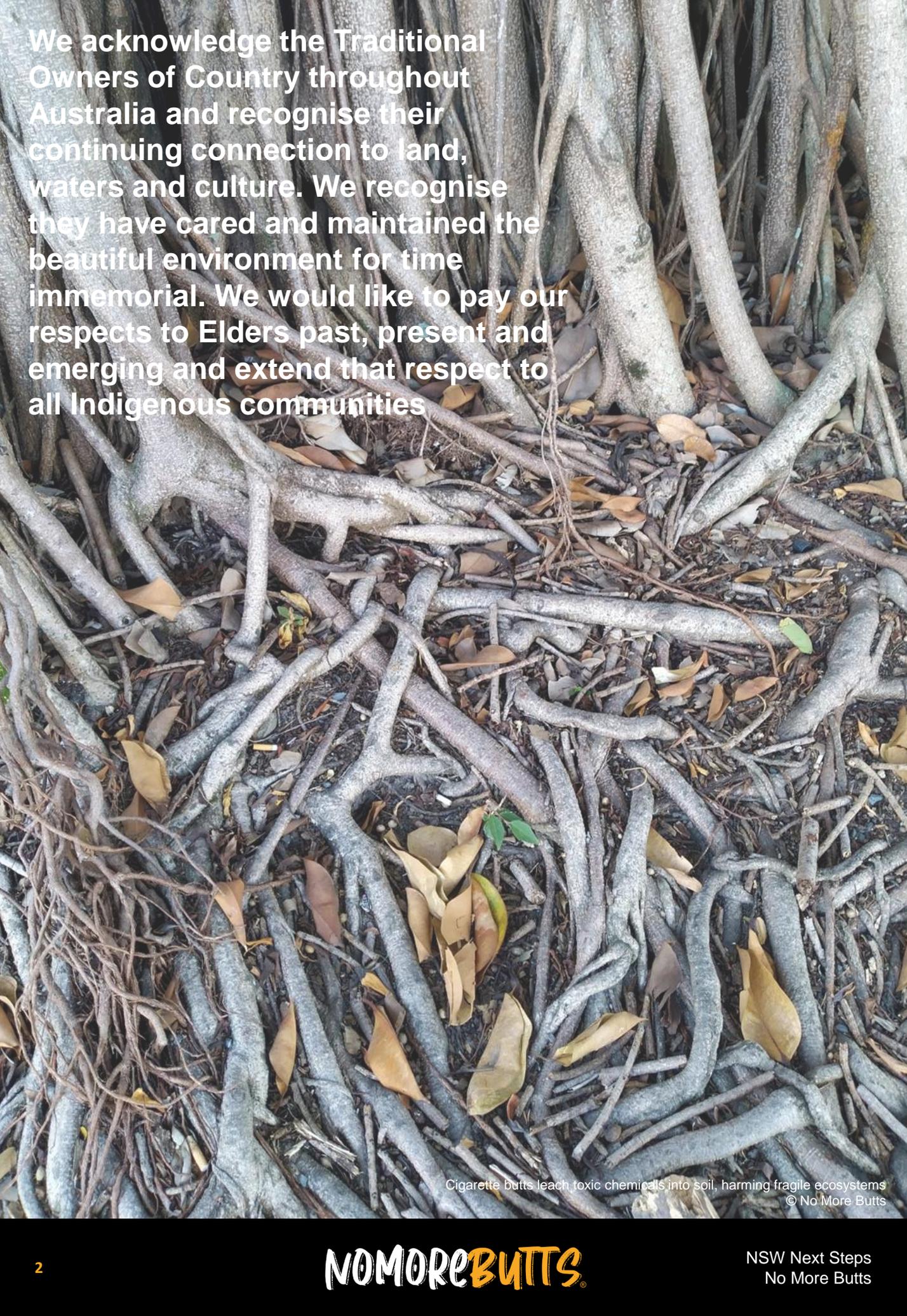


NOMOREBUTTS

**Next Steps for
tobacco filters:**

**A problematic and
unnecessary plastic
impacting the NSW
environment, and
human health**



A close-up photograph of a mangrove forest floor. The ground is covered with a complex network of grey, woody mangrove roots of various sizes and orientations. Interspersed among the roots are numerous discarded cigarette butts, some lying flat and others propped up. The scene is lit with natural, slightly overcast light, highlighting the textures of the roots and the paper of the butts.

We acknowledge the Traditional Owners of Country throughout Australia and recognise their continuing connection to land, waters and culture. We recognise they have cared and maintained the beautiful environment for time immemorial. We would like to pay our respects to Elders past, present and emerging and extend that respect to all Indigenous communities

Cigarette butts leach toxic chemicals into soil, harming fragile ecosystems
© No More Butts

Executive Summary

Sometimes, little things can have a big impact. Cigarette butts are a perfect example.

With almost all cigarettes containing a filter made of plastic, cigarette butts are the most littered item in the world. It is estimated that 4.5 trillion cigarette butts are littered into the environment every year, with up to 40% ending up in our waterways.

In New South Wales (NSW), it is estimated that 1.32 billion cigarettes butts are littered every year.

Not only do cigarette butts pollute tens of billions of tons of water each year in NSW alone, they can take up to 15 years to photodegrade, so the cumulative impact of plastic waste is also quite significant.

Cigarette butts contribute to the loss of biodiversity, by entering ecosystems and leaching toxic chemicals into soil, air and water. In addition, pollution is generated through the transportation of cigarettes, as well as the eventual plastic pollution issue which impacts the environment.

Tobacco filters are an unnecessary, avoidable plastic product. In addition to the microplastics created from the degradation, smoked tobacco filters collect several thousand chemicals, many of which are currently listed as Issues of Concern by the United Nations.

With a call from the World Health Organization in 2022 to ban tobacco filters being recently supported by research from the Belgian Superior Health Council, this consultation on cigarette filters is the perfect opportunity for NSW to take action on this form of toxic plastic pollution and set the standard for Australia.

Front: Cigarette butts are often found littered during beach clean ups.
Cover illustration created by No More Butts, using images by chercvc999 on Freepik

Inside cover: Cigarettes pose a threat to biodiversity.
Image: © No More Butts

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Photo credit: Karen Mason

Introduction

Cigarette butts are the most littered item globally¹.

Estimates suggest that up to 4.5 trillion cigarette butts are discarded into the environment every year². They are easily carried in stormwater runoff through drainage systems and eventually to local streams, rivers, and waterways³.

In NSW, 1.32 billion are littered every year⁴.

A Local Environment Quality Survey of England 2017/18⁵ 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. Globally, it has been reported that 40% of discarded cigarette butts make it into our oceans and waterways⁶.

With a plastic filter made from cellulose acetate⁷, cigarette butts are photodegradable, not biodegradable⁸. 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 microfibers are created¹⁰.

Using the littering rates and the average reported weight of a cigarette butt¹¹, it can be estimated that at least 350 thousand tons of plastic tobacco filters end up in waterways globally each year. With 15 years of litter accumulating, up to 5.3 million tons 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 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 organism¹³. With over 7,000 chemicals¹⁴ and research showing that each butt can contaminate up to 40 litres of water¹⁵, a study from 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 water¹⁶.

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 17.4 billion litres of water are polluted annually by toxic cigarette butts in NSW alone.



Photo credit: Linda Wick



Photo: © Mustafa Güner, generated by Canva / Getty Images Signature

The Triple Planetary Crisis

From deforestation through to the impacts of littered cigarette butts on ecosystems, including ingestion by land and marine species, cigarettes adversely contribute to all three elements of the Triple Planetary Crisis¹⁷.

Pollution

According to the World Health Organization (WHO), every year the tobacco industry clears 200 thousand hectares of land, cuts down 600 million trees, uses 22 billion tons of water, and emits 84 million tons of CO₂¹⁸.

Whether it's the farming of tobacco or the consumption of a cigarette stick, cigarettes also create air pollution. Additionally, emissions from transportation and the littering of plastic cigarette butts and packaging contribute further to the impacts of pollution.

The transportation of a finished pack of cigarettes to its point of sale often involves extensive transport costs, usually through diesel-driven trucks¹⁹. The WHO lists air pollution from transport in trucks as one of the primary causes of disease-related air pollution²⁰. As the most littered item on the planet²¹, cigarette butts contribute to 350 thousand tons of plastic pollution each year. In NSW, this amount is estimated to be 264 tons, accumulating up to four thousand tons over 15 years.

Climate Change

The WHO notes that climate change is impacted by contributions from CO2 emissions, with tobacco farming accounting for about 5% of total deforestation²².

Along with methane, nitrous oxide and other air pollutants, approximately 14g of CO2 is emitted per cigarette over its entire life cycle²³.

Filter-less cigarettes would reduce the amount of CO2 generated through a reduction in waste generated through production, as well as less weight during transportation.

Loss of Biodiversity

There is a significant impact on biodiversity throughout the production and littering of cigarette butts.

Tobacco farming leads to soil degradation, which hinders the maintenance of biodiversity. According to the WHO, to make 300 cigarettes roughly one tree is required²⁴. In 2017, the WHO identified thirteen countries where tobacco-driven habitat fragmentation and deforestation have led to significant loss of biodiversity²⁵.

Cigarettes also remain a cause of accidental and deliberate fires and wildfires. Discarded lit cigarettes are responsible for thousands of fires globally each year²⁶ and have been responsible for the significant loss of flora and fauna²⁷.

While the removal of cigarette filters may not lead to an immediate reduction in deforestation or wildfires, it would ensure less plastic pollution impacts our fragile ecosystems and enters our food chains.



Photo credit: National Autonomous University of Mexico



Cigarette butts that are littered get washed into waterways and pose an issue for marine species and water quality.
© No More Butts

Issues of Concern

Chemicals

With cigarettes known to contain 7,000 chemicals²⁸, cigarette filters trap many of these, as well as heavy metals from the tobacco through the process of smoking.

Initially promoted by the tobacco industry as making cigarettes safer, recent research has shown that filtered cigarettes have caused an increase in lung adenocarcinomas among smokers²⁹ and there are also suggestions that these plastic fibers can be ingested by smokers³⁰.

The University of California, Berkeley reports that toxic compounds in cigarette butts can include formaldehyde, nicotine, arsenic, lead, copper, chromium, cadmium, and a variety of polyaromatic hydrocarbons (PAHs)³¹.

The United Nations Environment Programme (UNEP) recently held a consultation on Chemicals and Waste Issues of Concern, noting 19 issues. Of those listed, it is worth noting that at least six of these substances are found in tobacco filters, including microplastics.

In addition to being a problematic and avoidable plastic in their own right, cigarette filters after consumption contain several chemicals of concern. Therefore, they should be a global concern, given they are the most littered item on the planet.

Secondary Releases of Microplastics

Comprised of a highly twisted network of thousands of cellulose acetate strands, tobacco filters could be determined as a microplastic fiber (or a plastic microfiber)³².

After being littered, these strands can break apart during photodegradation, causing the creation of thousands of microfibers.

These microfibers still contain several toxic chemicals which not only leach into the environment but can be ingested by aquatic organisms³³.



40% of discarded cigarette butts make their way into our oceans and waterways
© No More Butts



Image credit: United Nations Department of Economic and Social Affairs.

Connection to UN SDGs

Tobacco use and production is linked to negatively impacting all 17 of the United Nation (UN)'s Sustainable Development Goals (SDGs)³⁴.

With a specific connection to SDG3, Target 3a of the SDGs calls on members to adopt the WHO Framework Convention for Tobacco Control (FCTC).

Specifically related to waste and litter, cigarette filters also impact clean water and sanitation, due to their impacts on water quality. In many developing countries, where there is little education or infrastructure, cigarettes are consumed, and butts are littered in and around water sources that are used by the community for washing and even drinking.

There are also connections to responsible production and consumption: cigarette filters are an unnecessary plastic and therefore their production is unnecessarily causing impacts to emissions, impacting SDG3.

SDG14 and SDG15 are particularly impacted when we talk about protecting marine and terrestrial environments. With the toxic leachate from littered cigarette butts, our fragile ecosystems continue to be adversely impacted by the incorrect disposal of this plastic waste stream.

The removal of cigarette filters would help the NSW address their obligations to many of the SDGs.

Design for Environment

The Waste Hierarchy

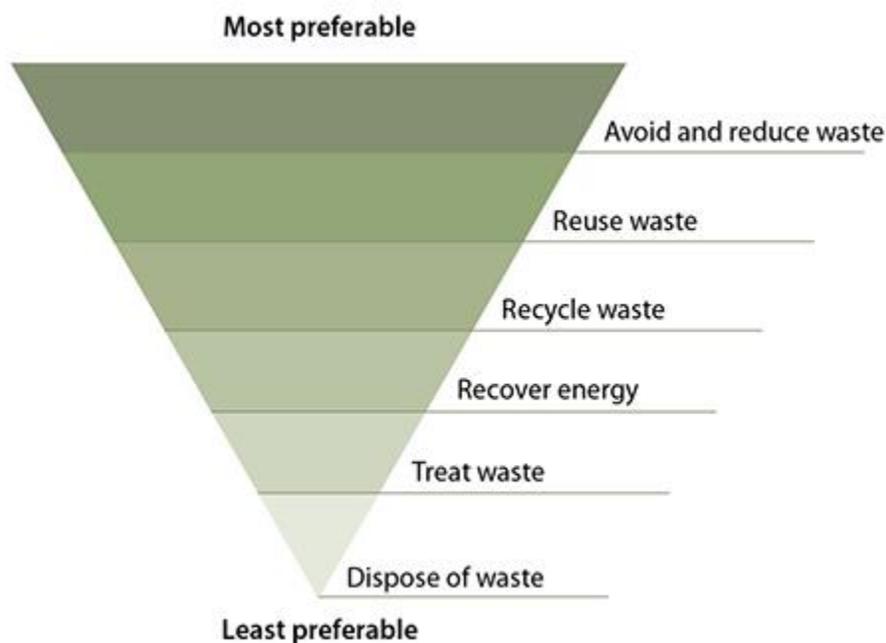


Image credit: NSW EPA. [Waste hierarchy. Ordered by most preferable: avoid and reduce; reuse; recycle; recover energy; treat; dispose of waste](#)

Cigarette butt litter is generated when smokers carelessly and illegally discard the remaining part of their cigarette into the environment. As such, most of the focus to date has been on cleaning up and prevention activities.

Prevention activities, including awareness programs and the provision of adequate infrastructure, are good initiatives to attempt to reduce the amount entering the environment. However, these initiatives focus on the accountability of the consumer, rather than treating the cause of the concern.

There have been some trial programs to recycle cigarette butts, but this is not currently viable in Australia, due to the relatively low volume and geographical spread of cities. Although this could be considered as a last resort, the focus should be on upstream measures.

As a problematic and unnecessary plastic additive, cigarette filters were introduced by the tobacco industry to respond to concerns around toxic chemicals and heavy metals.

Given the ongoing prevalence of cancer since cigarette filters were introduced, one could reasonably assume that it was a marketing technique used by tobacco companies to reduce their cost and maintain sales of cigarettes in the midst of a risk adverse consumer base.

Professor Thomas Novotny has published research about the potential damage to human health caused by cigarette filters³⁵.

Now that we know that cigarette filters are no safer than filter-less cigarettes for smokers, we need to move to the top of the waste hierarchy and design out this unnecessary waste stream, by mandating the removal of tobacco filters.

Product Stewardship

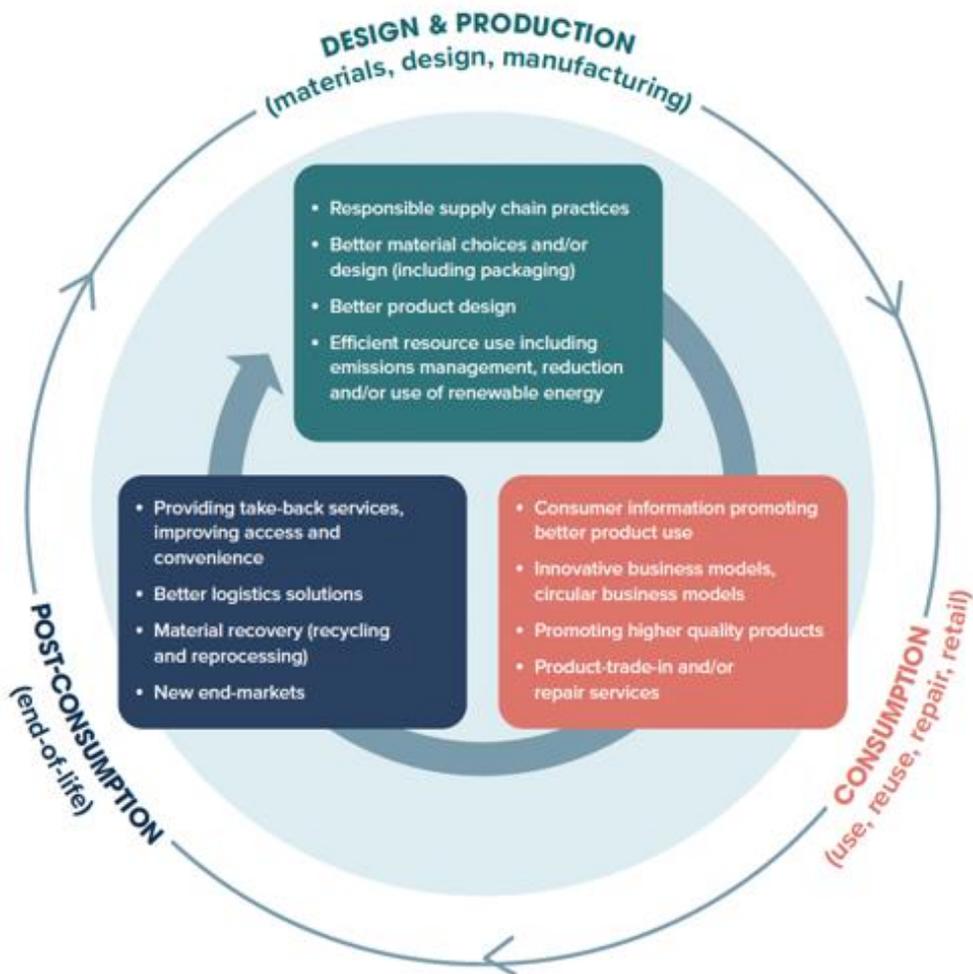
The Product Stewardship Centre of Excellence (PSCoE) has produced some great materials around the role of product stewardship and Extended Producer Responsibility schemes.

According to the PSCoE, product stewardship aims to manage and reduce the environmental and human health impacts of products and materials throughout their lifecycle, aligning with the core principles of a circular economy – design-out waste and pollution, keep products and materials in use and regenerate natural systems³⁶.

According to the product stewardship assessment framework provided by the PSCoE there are 33 distinct performance indicators³⁷.

Leading the Environmental indicators is “Eliminating the use of hazardous materials”³⁸.

As a product that uses an unnecessary plastic, which also contains hazardous substances during consumption, cigarette filters are a key example of where waste should be designed out.



Product stewardship activities across the product and material life-cycle

Image credit: Product Stewardship Centre of Excellence

National Updates

The EPA Waste Delivery Plan noted that the NSW Government will investigate extended producer responsibility options for problematic wastes, **starting with cigarette butts**³⁹. The proposed delivery plans included a proposed consultation phase from September 2021 to “commence investigating extended producer responsibility schemes for cigarette butts.”⁴⁰ Action 4 of the NSW Plastics Action Plan, released in June 2021, was to tackle cigarette butt litter⁴¹. Under Part 3 of the Plastics Reduction and Circular Economy Bill 2021 No 31, Product Stewardship controls are made available to the Government⁴². We are therefore encouraged by this current consultation.

The cost of cleaning up cigarette butt litter in Australia is estimated at \$73.3 million annually⁴³, 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 of \$47 million annually to eliminate cigarette butt litter⁴⁴.

Other Australian States have so far ignored action on cigarette filters in their single-use plastic plans, despite often noting that they are the most littered item. So far, the only action has come through South Australian Greens MP Robert Simms who proposed a cigarette butt waste amendment in February 2023, which would see tobacco responsible for paying for the costs of cigarette butt litter in that state⁴⁵.

In 2021, The Australian Government released their National Plastics Plan, with an Action under Plastics in our Oceans and Waterways targeting Cigarette Butts, with a plan for “The Australian Government to initiate an industry-led cross-sectoral stewardship taskforce to reduce cigarette butt litter in Australia and consider potential stewardship schemes”.⁴⁶

Submissions to the 2021-22 Commonwealth Minister for the Environment’s product stewardship priority list⁴⁷ overwhelmingly called for federal action on cigarette butts. Despite the Action planned and the calls from stakeholders, so far there has been no action⁴⁸.

We believe it is also relevant to reference the ongoing Inquiry into Plastic Pollution in Australia’s waterways and oceans⁴⁹ where several organisations have noted the amount of cigarette butts being collected near our coastal areas.

International Updates

A proposed ban on filters

Since 2022, the World Health Organization (WHO) have highlighted that there is no evidence to prove that the filter provides health benefits for smokers⁵⁰. We also wish to highlight the research conducted by the Belgian Superior Health Council⁵¹, at the request of the Belgian Environment Minister that concluded that cigarette filters may actually cause negative impacts to human health.

The United Kingdom (UK) held a consultation⁵² through their Department of Environment, Food and Rural Affairs (DEFRA), where 94% of respondents were supportive of the government taking regulatory action on tackling cigarette butt litter⁵³.

Extended Producer Responsibility

The EU has 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.

Other actions have focused on Extended Producer Responsibility Schemes, looking at the Polluter Pays Principle.

San Francisco collects litter taxes from retailers, along with charging tobacco companies for the cost of cleaning up. They are also charging retailers 1.25 USD per packet of cigarettes sold, which is ultimately passed on to the consumer and reported quarterly⁵⁴. This was actioned after a court ruling that tobacco companies were responsible for funding clean up costs.

In January 2023, Spain⁵⁵ and Ireland⁵⁶ announced that they were going to charge tobacco companies for the cost of clean up activities.

Smoke-free Generation

Actions such as Smoke Free Generations that have just been announced in UK⁵⁷ (but also recently repealed in New Zealand⁵⁸), whilst targeting primarily health concerns, would also provide significant relief for the environment and could be considered as a solution, even though it would be outside the scope of the Plastics Treaty.



This label is expected to be applied to all cigarette packets sold in the EU to highlight the dangers of littering plastic filters.

The Global Plastics Treaty

Mandated by the United Nations Environmental Agency 5/14 resolution, an Intergovernmental Negotiating Committee (INC) was convened to develop an international legally binding instrument on plastic pollution, including in the marine environment. For simplicity, it is often referred to as the Plastics Treaty.

The INC has met previously in Uruguay, France and Kenya, and will convene twice more in 2024, with a mandate to complete negotiations by the end of this year.

In preparation for the most recent meeting (INC-3), a Zero Draft⁵⁹ was prepared as a basis for discussions. The Zero Draft was accompanied by a Synthesis Report⁶⁰. Parties were welcomed to provide inputs into these documents, as well as topics that were not covered at INC-2.

In addition to No More Butts⁶¹, INC-3 submissions by Global Alliance for Incinerator Alternatives⁶² and the Microplastics Working Group⁶³ also highlighted the need to take action on tobacco filters through the Treaty process.

At the third INC in Nairobi in November of 2023, across nine days of discussions, member states and observers were able to give their verbal and written feedback on these documents, as well as other topics of substance.

Palau was the first member state to make an intervention on tobacco filters, highlighting that they “would like to call for the inclusion of cigarette filters on this list, as they are the most littered items in the world, harm land and marine eco-systems, are very difficult to collect, and disintegrate into toxic micro-plastics”⁶⁴.

Panama then echoed Palau’s position in their own verbal intervention. The World Health Organization also made an intervention⁶⁵, to support their pre-session submission⁶⁶ calling for a ban on tobacco filters as an outcome of the Plastics Treaty.

“they are the most littered items in the world, harm land and marine eco-systems, are very difficult to collect, and disintegrate into toxic micro-plastics”

Taking Action in NSW

Plastic cigarette filters should be banned in NSW, with effect from 30 September 2025.

By requesting that the DCCEEW asks the OIA to perform an analysis and work across Health and Environment Departments, the Commonwealth will be in a position to harmonise this ban across the country.

Initiating action prior to October 2024 will help inform the Intergovernmental Negotiating Committee for a Plastics Treaty, meaning that NSW could initiate global action, which would make the implementation of this much more effective.

A removal of filters would help with:

- Elimination of the creation of micro plastics
- Improvement in soil quality
- Improvement in water quality
- Reduction in harm of marine life from the ingestion of toxic plastics and chemicals
- Potential reduction in smoking rates

As the filter is intended to make the smoking experience more pleasurable, it is conceivable that there would be an overall reduction in smoking rates in NSW, having positive financial and health outcomes.

It would also have a positive impact on the financial burden currently worn by taxpayers for the clean-up costs.



People litter where they see litter.
© No More Butts

Addressing plastic targets through a ban

The removal of plastic cigarette filters align specifically with the ambitious targets of::

- Phasing out problematic and unnecessary plastics by 2025
- Reducing all litter items by 60% by 2030
- Reducing plastic litter items by 30% by 2025
- Reducing the observed littering rate of cigarette butts by half, down to 32%

Consideration of alternative materials

It should be very clear that the removal of any kind of filter from all commercially available cigarettes is the most optimal outcome.

Any alternative materials, including biodegradable filters, would only solve half of the problem. Solutions, like those being offered by companies such as Green Butts, should be approached with caution due to their connection to the tobacco industry⁶⁷.

If smokers insist on having filters to consume their cigarettes, they could be directed to adding their own filters, or to use a cigarette holder. It should be considered like a straw, in that it is unnecessary for most consumers to use the additional plastic item to consume their product.

Extended Producer Responsibility

In the event that cigarette filters are not phased out in NSW, producers need to be held accountable for the cost of cigarette butt litter in the State.

In a similar fashion to the City of San Francisco, this should be introduced in the form of a levy on every packet of cigarettes sold in the State of NSW. We would recommend the levy to be set at 1.00 AUD per packet, to be assessed annually and managed by the EPA.

Research

If plastic cigarette filters are not phased out through re-design out, then there will need to be investment into waste management and furthering research into end-of-life management of cigarette butts.

Despite researching and implementing several initiatives since 2020, including leading the pilot with Wollongong City Council and Fungi Solutions⁶⁸ and also running the CigCycle trial program, funded by Sustainability Victoria⁶⁹, No More Butts can confidently say that there is not currently a scalable, or commercially viable solution in Australia for the waste management and reverse logistics of cigarette butts.

However, if it is determined that this waste stream will not be designed out at manufacturer level, we need to identify the most effective way of dealing with the waste as a resource within Australia. Our article in Waste Management Review covers off the considerations and opportunities⁷⁰, in the case that a ban is not successful.



Conclusion

As the most littered item in NSW, cigarette filters should be banned by September 30 2025.

Cigarette filters are a problematic and unnecessary plastic, containing toxic chemicals and impacting fragile ecosystems.

With evidence recently being surfaced about the potential harms of cigarette filters to human health and an interest desire to ban them globally, NSW now has the opportunity to lead Australia and the world with their actions as an outcome of this consultation.

In taking a human health **and** environmental health approach to this consultation, a ban on all cigarette filters is a clear and necessary step forward.

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Organisation



No More Butts was formed to tackle the most littered item in the world: cigarette butts. Our vision is for a 'butt free environment'.

We are a Civil Society Organization (NGO), based out of Australia.

Performing multiple functions from research, consulting to government and peak bodies, in addition to performing pro bono work with councils and other environmental organizations, No More Butts is a subject matter expert on tobacco related waste.

No More Butts is a member of Boomerang Alliance and Break Free From Plastic and is a contributor to the Plastics Treaty Microplastics Working Group. We are an accredited observer to the United Nations Environment Assembly (UNEA) of the UNEP.

Conflict of Interest Statement

As part of the United Nations Sustainable Development Goals, SDG3 – “Ensure healthy lives and promote well-being for all ages” – UN member states pledged to “Strengthen the implementation of the World Health Organization Framework Convention on Tobacco Control [WHO FCTC] in all countries, as appropriate.”. This pledge is known as Target 3.a.

Article 5.3 of the WHO’s FCTC notes that there is a fundamental and irreconcilable conflict between public health interests and tobacco industry interests. At No More Butts, we believe that this conflict also extends to the impact on the environment.

Although we are not a state actor covered directly by Article 5.3, as a non-governmental organization that advocates for the protection of our natural environment, No More Butts does not engage with the tobacco industry and those furthering its interests.

As per the Handbook for non-state actors on engagement with the World Health Organization, the latter includes but is not limited to: "entities and subsidiaries engaged in the manufacturing, distribution and/or sale of tobacco or tobacco-related products; entities working to specifically further the interests of the tobacco industry through lobbying, advertising, legal advice or similar activities; entities being funded, supported or influenced in their governance by tobacco-related entities; and entities having tobacco industry or their representatives among their members."

All volunteers or future employees of No More Butts will be asked to complete a Conflict of Interest Declaration and may be excluded from engaging with the charity.

Founder

After witnessing the devastating impact of discarded cigarette butts on beautiful locations around the world, Shannon Mead was inspired to resign his corporate role and dedicate himself to No More Butts.

Along with a team of 12 others, Shannon works as a volunteer in the organisation, as a full-time focus and is the Executive Director. He has volunteered over 10,000 hours to the cause since inception.

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



SECTION 3

LETTERS
OF
SUPPORT

NOMOREBUTTS®

Index of Letters of Support for this submission

- Mr Alex Greenwich MP (Ind), Member for Sydney
- Ms Kobi Shetty MP (NSW Greens), Member for Balmain
- Mr Llew O'Brien MP (LNP), Federal Member for Wide Bay (Qld)
- Illawarra Shoalhaven Joint Organisation
- Prof. Thomas Novotny, University of San Diego
- Laureate Prof. Ravi Naidu, University of Newcastle
- Australian Marine Conservation Society
- Sea Shepherd Australia
- AUSMAP
- Beach Patrol
- Ten Little Pieces
- Purple Card Project
- Butt Out Australia

21 December 2023

To Whom It May Concern:

Cigarette Plastic Filter Ban – NSW Plastics: Next Steps

I strongly support the proposal in the NSW Plastics: Next Steps consultation to ban cigarette filters.

Cigarette filters are the most littered item in Australia and the single most common plastic found in ocean clean-ups. Used cigarette filters are filled with the around 7,000 chemicals found in cigarettes which leach into water and soil. One cigarette butt can pollute up to 40 litres of water, killing marine life.

The World Health Organization maintains that there is no evidence that filters provide health benefits for smokers, indeed evidence points to negative health effects. Research by the Belgian Superior Health Council at the request of the Belgian environment minister found filters make smoking more pleasurable leading to increased inhalation and volume of cigarettes smoked.

Banning plastic filters in cigarettes will have significant environmental and health benefits. Plastic pollution would be cut with improvements to water quality and marine life, as well as less litter in the environment. A reduction in smoking is also conceivable with positive impacts on health and the economy.

Replacement material for cellulose acetate filters is not a suitable alternative, noting that it would still leach toxic chemicals into the environment.

Cigarette filters are both problematic and unnecessary and I support the position of No More Butts for a ban on cigarette filters in New South Wales.

Could you please implement the proposal to ban cigarette filters in New South Wales to reduce plastic and chemical pollution in the state's waterways and waste stream?

Yours sincerely



Alex Greenwich
Member for Sydney





KOBI SHETTY MP

MEMBER FOR BALMAIN

201-205 Glebe Point Rd, Glebe NSW 2037
02 9660 7586
balmain@parliament.nsw.gov.au



The Hon. Penny Sharpe
Minister for Environment
GPO Box 5341
Sydney NSW 2001

Thursday, 01 February 2024

Dear Minister,

Penny

Please find enclosed a copy of correspondence I received from the organisation 'No More Butts' regarding the need to design out plastic cigarette filters.

'No More Butts' states their issue that plastic cigarette filters pose a substantial risk to both human health and to the environment. They state that mandating the removal of these filters would pose benefits such as reducing single use plastic waste and eliminating some micro plastic waste. They request that NSW should act to ban these filters and consult with the Federal Government to effect a national ban by 2026

I support the concerns raised by 'No More Butts' encourage you to examine their proposals. I look forward to receiving your response on this important matter.

Thank you for your time.

Yours sincerely,

Kobi Shetty MP
Member for Balmain

Encl. Correspondence from 'No More Butts.'



LLEW O'BRIEN MP

Federal Member for Wide Bay

LO/AB

9 January 2024

TO WHOM IT MAY CONCERN

I applaud the steps taken by the NSW Government to consult on designing out plastic cigarette filters, as part of their Next Steps consultation.

With cigarette butts being the most littered item in Australia, cigarette filters have a negative impact on both health and the environment. Cigarettes are known to contain 7,000 chemicals, many of which are trapped in the filter during consumption and pollute water and soil when they are littered into the environment. One cigarette butt can pollute up to 40 litres of water, killing marine life.

I acknowledge and accept that the World Health Organization has highlighted that there is no evidence to prove that the filter provides health benefits for smokers. I also highlight the research conducted by the Belgian Superior Health Council, at the request of the Belgian Environment Minister that concluded that cigarette filters may actually cause negative impacts to human health.

I further note the recent interventions by Palau and Panama at the third meeting of the Intergovernmental Negotiating Committee in November, who called for a ban on plastic cigarette filters. Although I am encouraged by this position, domestic action cannot wait for the outcome of Treaty negotiations.

As the filter is intended to make the smoking experience more pleasurable, it is conceivable that there would be an overall reduction in smoking rates in Australia, having positive financial and health outcomes. A reduction in the amount of this toxic litter stream would also have a positive impact on flora and fauna as well as soil quality. It would also have a positive impact on the financial burden currently worn by tax payers for the clean-up costs.

Benefits of the removal of plastic filters include:

- Reduction in littering of single use plastics
- Elimination of the creation of micro plastics
- Reduction in harm to marine life from ingestion of toxic plastics chemicals
- Improvement in water quality
- Positive to neutral impacts on human health

In line with the above, I support the position of No More Butts, that cigarette filters are both a problematic and unnecessary single-use plastic item and hereby request that cigarette filters are banned.

I do not believe that a replacement material for cellulose acetate filters is a suitable alternative, noting that advertising a biodegradable option would likely exaggerate the current littering issue and still leach toxic chemicals into the environment.

Finally, as an outcome of this consultation, I request that the Commonwealth Department of Climate Change, Energy, the Environment and Water engage the Commonwealth Office of Impact Analysis to assess the impacts of a removal of filters from all cigarettes imported and sold in Australia by 2026.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Llew O'Brien', written in a cursive style.

LLEW O'BRIEN MP
Federal Member for Wide Bay

25 January 2024

To Whom It May Concern:

We applaud the steps taken by the NSW Government to consult on designing out plastic cigarette filters, as part of their Next Steps consultation.

With cigarette butts being the most littered item in Australia, cigarette filters have a negative impact on both health and the environment. Cigarettes are known to contain 7,000 chemicals, many of which are trapped in the filter during consumption and pollute water and soil when they are littered into the environment. One cigarette butt can pollute up to 40 litres of water, killing marine life.

We acknowledge and accept that the World Health Organization has highlighted that there is no evidence to prove that the filter provides health benefits for smokers. We also highlight the research conducted by the Belgian Superior Health Council, at the request of the Belgian Environment Minister that concluded that cigarette filters may actually cause negative impacts to human health.

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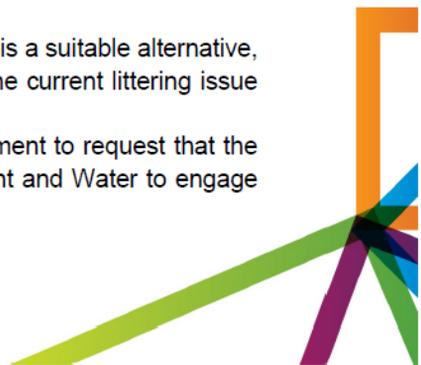
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- Positive to neutral impacts on human health

In line with the above, we support the position of No More Butts, that cigarette filters are both a problematic and unnecessary single-use plastic item and hereby request that cigarette filters are banned in NSW.

We do not believe that a replacement material for cellulose acetate filters is a suitable alternative, noting that advertising a biodegradable option would likely exaggerate the current littering issue and still leach toxic chemicals into the environment.

Finally, as an outcome of this consultation, we call on the NSW Government to request that the Commonwealth Department of Climate Change, Energy, the Environment and Water to engage



the Commonwealth Office of Impact Analysis to assess the impacts of a removal of filters from all cigarettes imported and sold in Australia by 2026.

If you have any queries on the above submission, please don't hesitate to contact the undersigned.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R. Stephan', with a stylized flourish at the end.

Roger Stephan
Chief Executive Officer
Illawarra Shoalhaven Joint Organisation



SAN DIEGO STATE
UNIVERSITY

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San Diego State University 5500
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Date: January 30, 2024

To: Concerned Parties

From: Thomas E. Novotny MD MPH DSc (Hon)
Professor Emeritus, San Diego State University, tnovotny@sdsu.edu

Re: Cigarette Plastic Filter Ban – NSW Plastics

I write to offer my strong support for the proposal in the *NSW Plastics: Next Steps Consultation to Ban Cigarette Filters*. I am Professor Emeritus of Epidemiology and Biostatistics in the San Diego State University (SDSU) School of Public Health. I serve as Co-director of the SDSU Center for Tobacco and the Environment (<https://cte.sdsu.edu/>), whose mission is to protect indoor and outdoor environments from persistent and toxic tobacco product pollutants. I have conducted research and provided expert consultation on the life cycle of tobacco's environmental impacts for more than 15 years. I have served as editor, contributor and reviewer of numerous Reports of the US Surgeon General on the Health Consequences of Tobacco and as an expert consultant and researcher on tobacco issues with the World Health Organization, the World Bank, the US Food and Drug Administration, the US Centers for Disease Control and Prevention, and the US National Cancer Institute.

I have focused more recently on the adverse effects of tobacco product waste (TPW), defined as all discarded waste products resulting from cigarette smoking, vaping, heated tobacco product use, smokeless tobacco use, and cigar use, including packaging and other product accessories. The most commonly collected item of trash in more than 30 years of reporting from the International Coastal Cleanup event is cigarette butts, and the most important component of this waste product is the plastic (cellulose acetate) filter, attached to more than 90% of commercial cigarettes sold globally. In local studies of TPW collection, we have found that filtered cigarette butts comprise 94% of this waste. In Australia, cleanup campaigns report that cigarette butts are also the most common item of collected trash (16.2%).¹ These waste items leach toxic, carcinogenic, and bioaccumulative chemicals into the natural environment. In laboratory studies, leachates demonstrate toxicity to a wide variety of microorganisms, invertebrates, vertebrates, and plants. Of particular and timely consideration, the cellulose acetate filter is a source of microplastic and nanoplastic environmental pollution, which may have further implications for human health. Due to the adsorptive capacity of cellulose acetate fibers, these particles may serve as a transport medium for the toxic chemicals produced by tobacco combustion.

¹ MacKenzie, R. et al., The environmental impact of tobacco use. In Greenhalgh, EM, Scollo, MM and Winstanley, MH [editors]. Tobacco in Australia: Facts and issues. Melbourne: Cancer Council Victoria; 2021. <http://www.tobaccoinaustralia.org.au/chapter-10-tobacco-industry/10-16-the-environmental-impact-of-tobacco-use>

Although butts may be widely distributed and only minimally mitigated through cleanup campaigns, we do not know precisely how many end up each year in the environment. We do know that more than five trillion are sold annually across the globe, and in Australia, this total is approximately nine billion annually. Some estimates suggest smokers may discard up to two thirds of their smoked cigarettes as part of the smoking ritual (the rest may or may not end up in landfills, but they are still waste products). In Australia, this amounts to about 1.2 million kg per year for discarded butts (based on a weight of 3.4 gm per 20 filtered cigarettes).

It is important to point out that the word 'filter' is a misnomer when considering any cigarette attachment labeled as such. Filtered cigarette smoking is not less harmful than unfiltered cigarette smoking; in fact, as filtered cigarettes became normalized across the industry beginning in the 1960s, cancer surveillance systems found that the incidence of an aggressive type of lung cancer (adenocarcinoma) increased. This was due to changes in the commercial cigarette, causing smokers to inhale more deeply and to compensate in other ways to counterbalance any 'benefits' from lowered machine-measured tar and nicotine delivery. The 'filter' is now considered simply a marketing tool, as it makes it easier for young people to take the first puff, makes it less likely for addicted smokers to quit, and attempts to mislead people who smoke into thinking they are doing 'something' to reduce their risks.

The evidence is growing to assert that, in contrast to any health benefits due to filtered cigarette smoking, the cigarette filter is actually a human health and environmental hazard.² It does not reduce the enormous risks of smoking, it sustains initiation and continued use of cigarettes, and it is a source of chemical and plastic environmental pollution. The United Nations Environment Program has recently initiated treaty negotiations regarding the global plastic pollution crisis, and the cellulose acetate cigarette filter issue is a part of these negotiations. Because it is a non-essential, widely dispersed, and potentially harmful consumer product, it should be regulated out of existence for both human health and environmental considerations. The global tobacco industry has so far been able to avoid any such regulation by diverting attention away from this defective product and inserting new tobacco products that claim lower risks into the market. They engage in 'corporate social responsibility' activities, such as cleanup campaigns, that cannot possibly reduce the enormous and continued burden of cigarette butt waste (only about a million butts were collected during the International Coastal Cleanup vs. 5.2 trillion sold that year). They are not stakeholders in addressing either the public health or the environmental damages due to tobacco, as their goal is to sell cigarettes, no matter the enormous health risks or the growing environmental pollution caused by them.

Banning the sale of filtered cigarettes, plastic or not, will greatly benefit Australians and will help protect Australia's economically valuable and treasured environments. This bold action will lead the way for other countries to consider similar interventions. It supports recommendations from the World Health Organization and the scientific community to consider tobacco use not only one of the most important causes of preventable death globally but also one of the most important sources of environmental pollution.

² Novotny TE, Hamzai L. Cellulose acetate cigarette filter is hazardous to human health. *Tob Control* 2023 Apr 18;tc-2023-057925. doi: 10.1136/tc-2023-057925. Epub ahead of print. PMID: 37072169.

24 January 2024

To Whom It May Concern:

We applaud the steps taken by the NSW Government to consult on designing out plastic cigarette filters, as part of their Next Steps consultation.

With cigarette butts being the most littered item in Australia, cigarette filters have a negative impact on both health and the environment. Cigarettes are known to contain 7,000 chemicals, many of which are trapped in the filter during consumption and pollute water and soil when they are littered into the environment. One cigarette butt can pollute up to 40 litres of water, killing marine life.

We acknowledge and accept that the World Health Organization has highlighted that there is no evidence to prove that the filter provides health benefits for smokers. We also highlight the research conducted by the Belgian Superior Health Council, at the request of the Belgian Environment Minister that concluded that cigarette filters may actually cause negative impacts to human health.

We further note the recent interventions by Palau and Panama at the third meeting of the Intergovernmental Negotiating Committee in November, who called for a ban on plastic cigarette filters. Although we are encouraged by this position, domestic action cannot wait for the outcome of Treaty negotiations.

As the filter is intended to make the smoking experience more pleasurable, it is conceivable that there would be an overall reduction in smoking rates in Australia, having positive financial and health outcomes. A reduction in the amount of this toxic litter stream would also have a positive impact on flora and fauna as well as soil quality. It would also have a positive impact on the financial burden currently worn by tax payers for the clean up costs.

Benefits of the removal of plastic filters include:

- Reduction in littering of single use plastics
- Elimination of the creation of micro plastics
- Reduction in harm from marine life from ingestion of toxic plastics chemicals
- Improvement in water quality
- Positive to neutral impacts on human health

In line with the above, we support the position of No More Butts, that cigarette filters are both a problematic and unnecessary single-use plastic item and hereby request that cigarette filters are banned in NSW.

We do not believe that a replacement material for cellulose acetate filters is a suitable alternative, noting that advertising a biodegradable option would likely exaggerate the current littering issue and still leach toxic chemicals into the environment.

Finally, as an outcome of this consultation, we call on the NSW Government to request that the Commonwealth Department of Climate Change, Energy, the Environment and Water to engage the Commonwealth Office of Impact Analysis to assess the impacts of a removal of filters from all cigarettes imported and sold in Australia by 2026.

If you have any queries on the above submission, please don't hesitate to contact the undersigned.

Yours sincerely,



Laureate Professor Ravi Naidu

MSc (Aberdeen-USP), PhD (Massey), PhD (hc, TNAU), DSc (Massey), FSSSA, FSSSNZ, FASA, FAAAS, EASA, FRACI, FRSC, FFINAAS, FTSE, FFRSNZ, CChem

Founding Director

Global Centre for Environmental Remediation (GCER)

College of Engineering Science and Environment

T: +61 2 4913 8705 | E: Ravi.Naidu@newcastle.edu.au



1st December 2023

To Whom It May Concern,

Support for mandatory phase out of plastic cigarette filters

We applaud the steps taken by the NSW Government to consult on designing out plastic cigarette filters, as part of their Next Steps consultation.

With cigarette butts being the most littered item in Australia, cigarette filters have a negative impact on both health and the environment.

Cigarettes are known to contain 7,000 chemicals, many of which are trapped in the filter during consumption and pollute water and soil when they are littered into the environment. One cigarette butt can pollute up to 40 litres of water, killing marine life.

We acknowledge and accept that the World Health Organization has highlighted that there is no evidence to prove that the filter provides health benefits for smokers. We also highlight the research conducted by the Belgian Superior Health Council, at the request of the Belgian Environment Minister that concluded that cigarette filters may actually cause negative impacts to human health.

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In line with the above, we support the position of No More Butts, that cigarette filters are both a problematic and unnecessary single-use plastic item and hereby request that cigarette filters are banned in NSW.

Australian Marine Conservation Society

w marineconservation.org.au

PO Box 5815, West End QLD 4101 p 07 3846 6777 e amcs@amcs.org.au

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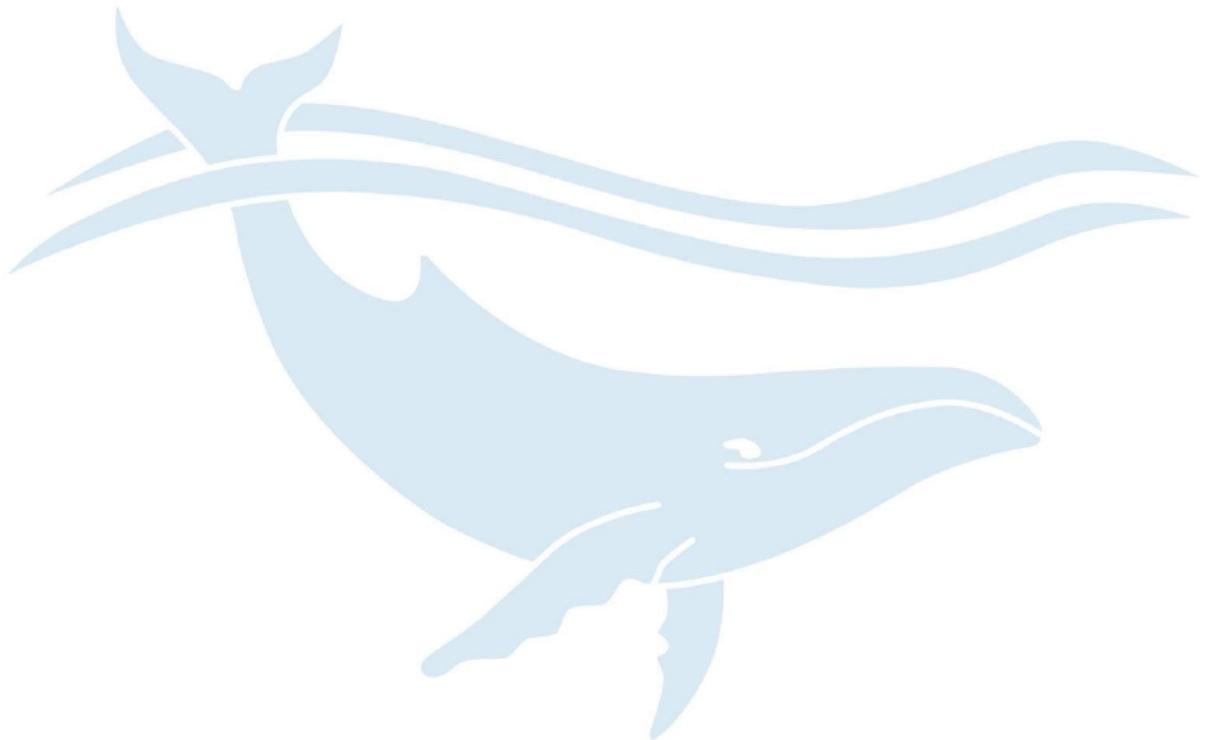
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If you have any queries on the above submission, please don't hesitate to contact the undersigned.

Yours sincerely,



Shane Cucow
Plastics Campaign Manager
Australian Marine Conservation Society
P: 07 3846 6777
E: shanecucow@amcs.org.au





Sea Shepherd Australia
2 Ann Street
Williamstown VIC 3016
marinedebrisadmin@seashepherd.org.au
Tel: 1300 623 267

24th January 2024

Email: plasticsconsultation@epa.nsw.gov.au

To Whom It May Concern:

We applaud the steps taken by the NSW Government to consult on designing out plastic cigarette filters, as part of their Next Steps consultation.

With cigarette butts being the most littered item in Australia, cigarette filters have a negative impact on both health and the environment. Cigarettes are known to contain 7,000 chemicals, many of which are trapped in the filter during consumption and pollute water and soil when they are littered into the environment. One cigarette butt can pollute up to 40 litres of water, killing marine life.

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Benefits of the removal of plastic filers include:

- Reduction in littering of single use plastics.
- Elimination of the creation of micro plastics.
- Reduction in harm from marine life from ingestion of toxic plastics chemicals.
- Improvement in water quality.
- Positive to neutral impacts on human health.

In line with the above, we support the position of No More Butts, that cigarette filters are both a problematic and unnecessary single-use plastic item and hereby request that cigarette filters are banned in NSW.

We do not believe that a replacement material for cellulose acetate filters is a suitable alternative, noting that advertising a biodegradable option would likely exaggerate the current littering issue and still leach toxic chemicals into the environment.

Finally, as an outcome of this consultation, we call on the NSW Government to request that the Commonwealth Department of Climate Change, Energy, the Environment and Water to engage the Commonwealth Office of Impact Analysis to assess the impacts of a removal of filters from all cigarettes imported and sold in Australia by 2026.

If you have any queries on the above submission, please don't hesitate to contact the undersigned.

Yours sincerely,

Karolina Strittmatter
Sea Shepherd Australia
Marine Debris Campaign Coordinator





Dr Michelle Blewitt
AUSMAP Program Director
99 Devonshire St., Surry Hills
michelle.blewitt@tec.org.au

2nd February 2024

To Whom It May Concern:

We applaud the steps taken by the NSW Government to consult on designing out plastic cigarette filters, as part of their Next Steps consultation.

With cigarette butts being the most littered item in Australia, cigarette filters have a negative impact on both health and the environment. Cigarettes are known to contain more than 7,000 chemicals, many of which are trapped in the filter during consumption and pollute water and soil when they are littered into the environment. One cigarette butt can pollute up to 40 litres of water, killing aquatic life.

We acknowledge and accept that the World Health Organisation has highlighted that there is no evidence to prove that the filter provides health benefits for smokers. We also highlight the research conducted by the Belgian Superior Health Council, at the request of the Belgian Environment Minister that concluded that cigarette filters may actually cause negative impacts to human health.

We further note the recent interventions by Palau and Panama at the third meeting of the Intergovernmental Negotiating Committee in November, who called for a ban on plastic cigarette filters. Although we are encouraged by this position, domestic action cannot wait for the outcome of Treaty negotiations.

As the filter is intended to make the smoking experience more pleasurable, it is conceivable that there would be an overall reduction in smoking rates in Australia, having positive financial and health outcomes. A reduction in the amount of this toxic litter stream would also have a positive impact on flora and fauna as well as soil quality. It would also have a positive impact on the financial burden currently worn by tax payers for the clean-up costs.

Benefits of the removal of plastic filters include:

- + Reduction in littering of single use plastics
- + Elimination of the creation of micro plastics
- + Reduction in harm from marine life from ingestion of toxic plastics chemicals
- + Improvement in water quality
- + Positive to neutral impacts on human health

In line with the above, we support the position of No More Butts, that cigarette filters are both a problematic and unnecessary single-use plastic item and hereby request that cigarette filters are banned in NSW.

We do not believe that a replacement material for cellulose acetate filters is a suitable alternative, noting that advertising a biodegradable option would likely exaggerate the current littering issue and still leach toxic chemicals into the environment.

Finally, as an outcome of this consultation, we call on the NSW Government to request that the Commonwealth Department of Climate Change, Energy, the Environment and Water to engage the Commonwealth Office of Impact Analysis to assess the impacts of a removal of filters from all cigarettes imported and sold in Australia by 2026.

If you have any queries on the above submission, please don't hesitate to contact the undersigned.

Yours sincerely,

Dr Michelle Blewitt



20th December 2023

To Whom It May Concern:

We applaud the steps taken by the NSW Government to consult on designing out plastic cigarette filters, as part of their Next Steps consultation.

With cigarette butts being the most littered item in Australia, cigarette filters have a negative impact on both health and the environment. Cigarettes are known to contain 7,000 chemicals, many of which are trapped in the filter during consumption and pollute water and soil when they are littered into the environment. One cigarette butt can pollute up to 40 litres of water, killing marine life.

We acknowledge and accept that the World Health Organization has highlighted that there is no evidence to prove that the filter provides health benefits for smokers. We also highlight the research conducted by the Belgian Superior Health Council, at the request of the Belgian Environment Minister that concluded that cigarette filters may cause negative impacts to human health.

We further note the recent interventions by Palau and Panama at the third meeting of the Intergovernmental Negotiating Committee in November, who called for a ban on plastic cigarette filters. Although we are encouraged by this position, domestic action cannot wait for the outcome of Treaty negotiations.

As the filter is intended to make the smoking experience more pleasurable, it is conceivable that there would be an overall reduction in smoking rates in Australia, having positive financial and health outcomes. A reduction in the amount of this toxic litter stream would also have a positive impact on flora and fauna as well as soil quality. It would also have a positive impact on the financial burden currently worn by tax payers for the clean up costs.

Benefits of the removal of plastic filers include:

- Reduction in littering of single use plastics
- Elimination of the creation of micro plastics
- Reduction in harm from marine life from ingestion of toxic plastics chemicals
- Improvement in water quality
- Positive to neutral impacts on human health

In line with the above, we support the position of No More Butts, that cigarette filters are both a problematic and unnecessary single-use plastic item and hereby request that cigarette filters are banned in NSW.



We do not believe that a replacement material for cellulose acetate filters is a suitable alternative, noting that advertising a biodegradable option would likely exaggerate the current littering issue and still leach toxic chemicals into the environment.

Finally, as an outcome of this consultation, we call on the NSW Government to request that the Commonwealth Department of Climate Change, Energy, the Environment and Water to engage the Commonwealth Office of Impact Analysis to assess the impacts of a removal of filters from all cigarettes imported and sold in Australia by 2026.

If you have any queries on the above submission, please don't hesitate to contact the undersigned.

Yours sincerely,

Alison Foley

Founder & Director

M: +61 419 899 021

www.tenlittlepieces.com



We acknowledge the traditional owners of the land on which we live, work and play, and pay our respects to Elders past, present and emerging.



BeachPatrol Australia

Encompassing BeachPatrol and Love Our Street
admin@beachpatrol.com.au www.beachpatrol.com.au



27th December 2023

To Whom It May Concern:

We applaud the steps taken by the NSW Government to consult on designing out plastic cigarette filters, as part of their Next Steps consultation.

With cigarette butts being the most littered item in Australia, cigarette filters have a negative impact on both health and the environment. Cigarettes are known to contain 7,000 chemicals, many of which are trapped in the filter during consumption and pollute water and soil when they are littered into the environment. One cigarette butt can pollute up to 40 litres of water, killing marine life.

We acknowledge and accept that the World Health Organization has highlighted that there is no evidence to prove that the filter provides health benefits for smokers. We also highlight the research conducted by the Belgian Superior Health Council, at the request of the Belgian Environment Minister that concluded that cigarette filters may actually cause negative impacts to human health.

We further note the recent interventions by Palau and Panama at the third meeting of the Intergovernmental Negotiating Committee in November, who called for a ban on plastic cigarette filters. Although we are encouraged by this position, domestic action cannot wait for the outcome of Treaty negotiations.

As the filter is intended to make the smoking experience more pleasurable, it is conceivable that there would be an overall reduction in smoking rates in Australia, having positive financial and health outcomes. A reduction in the amount of this toxic litter stream would also have a positive impact on flora and fauna as well as soil quality. It would also have a positive impact on the financial burden currently worn by tax payers for the clean up costs.

Benefits of the removal of plastic filters include:

- Reduction in littering of single use plastics
- Elimination of the creation of micro plastics
- Reduction in harm from marine life from ingestion of toxic plastics chemicals
- Improvement in water quality
- Positive to neutral impacts on human health

In line with the above, we support the position of No More Butts, that cigarette filters are both a problematic and unnecessary single-use plastic item and hereby request that cigarette filters are banned in NSW.

We do not believe that a replacement material for cellulose acetate filters is a suitable alternative, noting that advertising a biodegradable option would likely exaggerate the current littering issue and still leach toxic chemicals into the environment.



BeachPatrol Australia

Encompassing BeachPatrol and Love Our Street
admin@beachpatrol.com.au www.beachpatrol.com.au



Finally, as an outcome of this consultation, we call on the NSW Government to request that the Commonwealth Department of Climate Change, Energy, the Environment and Water to engage the Commonwealth Office of Impact Analysis to assess the impacts of a removal of filters from all cigarettes imported and sold in Australia by 2026.

If you have any queries on the above submission, please don't hesitate to contact the undersigned.

Yours sincerely,

Dr Ross Headifen
President
BeachPatrol Australia
0412 876 154
admin@beachpatrol.com.au



Purple Card
Project

To Whom It May Concern

02/02/2024

We commend the NSW Government for initiating consultations regarding designing out plastic cigarette filters as part of their Next Steps consultation.

Cigarette filters, the most common litter in Australia, pose significant health and environmental hazards. Cigarettes contain around 7,000 chemicals, many of which are trapped in filters and subsequently contaminate water and soil. Just one butt can pollute up to 40 liters of water, endangering marine life.

The World Health Organization's stance is that cigarette filters offer no proven health benefits for smokers, and research suggests there may be negative health impacts of cigarette filters (Everaert et al. 2023. *Front Public Health*. 11:1282655).

We also recognize recent calls by Palau and Panama for a ban on plastic cigarette filters at an international level. However, we believe domestic action is necessary, independent of global treaty negotiations.

Removing plastic filters could potentially reduce smoking rates in Australia, yielding positive financial and health outcomes. Moreover, it would mitigate the environmental burden, benefiting flora, fauna, and soil quality, while reducing taxpayer-funded cleanup costs.

The removal of plastic filters would result in numerous benefits:

- Decreased single-use plastic littering
- Elimination of microplastic production
- Reduced harm to marine life from ingesting toxic plastics
- Improved water quality
- Positive to neutral impacts on human health

Aligned with the stance of No More Butts, we advocate for the prohibition of cigarette filters in NSW. We caution against replacing cellulose acetate filters with biodegradable alternatives, as this may exacerbate littering issues and would still release harmful chemicals.

Finally, we urge the NSW Government to request that the Commonwealth Department of Climate Change, Energy, the Environment and Water engage the Commonwealth Office of Impact Analysis to assess the implications of removing filters from all cigarettes imported and sold in Australia by 2026.

For any inquiries regarding this submission, please feel free to contact the undersigned.

Sincerely,

Bianca Bartlett
Environmental Management Lead
Purple Card Project
Phone: 0420776343
Email: biancabartlett@purplecardproject.org



ABN: 72 075 746 440

1st December 2023

To Whom It May Concern:

We applaud the steps taken by the NSW Government to consult on designing out plastic cigarette filters, as part of their Next Steps consultation.

With cigarette butts being the most littered item in Australia, cigarette filters have a negative impact on both health and the environment. Cigarettes are known to contain 7,000 chemicals, many of which are trapped in the filter during consumption and pollute water and soil when they are littered into the environment. One cigarette butt can pollute up to 40 litres of water, killing marine life.

We acknowledge and accept that the World Health Organization has highlighted that there is no evidence to prove that the filter provides health benefits for smokers. We also highlight the research conducted by the Belgian Superior Health Council, at the request of the Belgian Environment Minister that concluded that cigarette filters may actually cause negative impacts to human health.

We further note the recent interventions by Palau and Panama at the third meeting of the Intergovernmental Negotiating Committee in November, who called for a ban on plastic cigarette filters. Although we are encouraged by this position, domestic action cannot wait for the outcome of Treaty negotiations.

As the filter is intended to make the smoking experience more pleasurable, it is conceivable that there would be an overall reduction in smoking rates in Australia, having positive financial and health outcomes. A reduction in the amount of this toxic litter stream would also have a positive impact on flora and fauna as well as soil quality. It would also have a positive impact on the financial burden currently worn by tax payers for the clean up costs.

Benefits of the removal of plastic filters include:

- Reduction in littering of single use plastics
- Elimination of the creation of micro plastics
- Reduction in harm from marine life from ingestion of toxic plastics chemicals
- Improvement in water quality
- Positive to neutral impacts on human health

In line with the above, we support the position of No More Butts, that cigarette filters are both a problematic and unnecessary single-use plastic item and hereby request that cigarette filters are banned in NSW.

We do not believe that a replacement material for cellulose acetate filters is a suitable alternative, noting that advertising a biodegradable option would likely exaggerate the current littering issue and still leach toxic chemicals into the environment,



Finally, as an outcome of this consultation, we call on the NSW Government to request that the Commonwealth Department of Climate Change, Energy, the Environment and Water to engage the Commonwealth Office of Impact Analysis to assess the impacts of a removal of filters from all cigarettes imported and sold in Australia by 2026.

If you have any queries on the above submission, 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



Contact number: 0488594574

Contact email: jeremy@buttoutaustralia.com.au

Index of Letters of Support for similar submissions

These submissions were made during 2022 and 2023 and are only included to show indicative support from an additional range of stakeholders that have not had the chance to reply, or it was not appropriate for them to reply to a State-based submission. The inclusion does not intend to suggest specific support for this submission.

- Hon Mr Michael Healy MP (ALP), Queensland Minister for Tourism
- The Hon. Warren Entsch MP (LNP), Federal Member for Leichhardt
- Byron Shire Council
- Boomerang Alliance
- Surfrider Foundation Australia
- SO Shire



25 November 2022

Dear Committee Secretary

I am writing in support of my constituent Mr Shannon Mead who is the founding member of No More Butts, a Cairns-based registered Australian charity with a specific focus on tackling cigarette butt litter.

No More Butts submission to the new inquiry into plastic pollution in Australia's oceans announced by The House of Representatives Standing Committee on Climate Change, Energy, Environment and Water on November 10th 2022, is requesting that cigarette butts be taken into account when analysing the impacts of plastic in both our environment and water. They are also requesting that cigarette butts are also considered when reviewing proposed solutions to address the issue of plastic pollution, including any discussions regarding the negotiations into a legally binding agreement on plastic pollution globally.

The statistics of cigarette butt litter is staggering with Australia generating nearly 3,500 tonnes of plastic waste solely from consuming single use cigarettes with suggestions that up to two-thirds of this amount is littered into our environment.

Cairns has a high smoking rate so the situation of cigarette butt litter in Cairns and surrounds is critical and coupled with the catchment areas and pending wet season, littered cigarette butts will cause issues in water quality for our reef, not to mention increase the micro plastics/marine debris that sits in the water and subsequently enters the food chain for 15 years.

A reduction in the amount of litter would no doubt have a positive impact on our unique flora and fauna as well as soil quality. It also would have a positive impact on the financial burden worn presently by taxpayers, for the clean-up costs. Ironically the intention of the filter is to make the smoking experience more pleasurable, so it is conceivable that there would be an overall reduction in smoking rates in Australia.

Thank you for your consideration of this submission by No More Butts.

Yours sincerely

Michael Healy MP
Member for Cairns
Assistant Minister for Tourism Industry Development



P (07) 4229 0110

E cairns@parliament.qld.gov.au

M PO Box 4737 Cairns Qld 4870

A 50 Spence Street, Cairns

 Michael Healy MP



Email: warren.entsch.mp@aph.gov.au Web: www.warrenentsch.com.au

Letter of Support

As the Federal Member for Leichhardt, I write in support of the submission by No More Butts to the inquiry into plastic pollution in Australia's oceans announced by The House of Representatives Standing Committee on Climate Change, Energy, Environment and Water on November 10th 2022.

The request is that that cigarette butts are considered when analysing the impacts of plastic on environment and our water.

The request is also request for consideration when reviewing proposed solutions to address the issue of plastic pollution, including any discussions regarding the negotiations into a legally binding agreement on plastic pollution globally.

With cigarette butts being the most littered item in Australia, the plastic tobacco filters have a negative impact on both health and the environment, including the ocean. Cigarettes are known to contain 7,000 chemicals, most of which are trapped in the filter and pollute water and soil when they are littered into the environment. One cigarette butt can pollute up to 40 litres of water, killing marine life.

Based on the weight of a standard cigarette butt and most recent information on consumption, Australia generates nearly 3,500 tonnes of plastic waste from consuming single use cigarettes. It has been suggested that up to two-thirds of this amount is littered into our environment.

As such we support the view of No More Butts, that tobacco filters are both a problematic and unnecessary single-use plastic item and hereby request that the Commonwealth Government looks to engage in public consultation about the removal of plastic filters as an outcome of this inquiry.

I strongly support the submission to assist in making a positive impact on flora and fauna as well as soil quality.

I urge you to consider the submission and I look forward to hearing of a positive outcome.

Kind Regards,

Hon. Warren Entsch MP
Federal Member for Leichhardt

28th November 2022

#E2022/124860
Your ref: Letter of Support - No More Butts Submission
Contact: Zoe White - zwhite@byron.nsw.gov.au



09 December 2022

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

Dear Committee Secretary

Submission for Inquiry into plastic pollution in Australia's oceans and waterways

This letter is to support the submission by No More Butts to the recent inquiry into plastic pollution in Australia's oceans announced by The House of Representatives Standing Committee on Climate Change, Energy, Environment and Water on November 10th 2022.

We request that cigarette butts are taken into account when analysing the impacts of plastic on environment and our water. We also request that they are considered when reviewing proposed solutions to address the issue of plastic pollution, including any discussions regarding the negotiations into a legally binding agreement on plastic pollution globally.

With cigarette butts being the most littered item in Australia, the plastic tobacco filters have a negative impact on both health and the environment, including the ocean. Cigarettes are known to contain 7,000 chemicals, most of which are trapped in the filter and pollute water and soil when they are littered into the environment. One cigarette butt can pollute up to 40 litres of water, killing marine life.

Within the Byron Shire, cigarette butts and/or filters are still the most littered item found on both land and beach litter surveys, despite a range of extensive prevention and clean-up efforts implemented through our Butt Free Byron Shire campaign. Monthly audits at litter 'hot-spots' identify over 150 littered cigarette butts within a 25m transect, indicating this is an ongoing issue, both locally and nationally.

Additionally, when engaging with our community and visitors on the issue, there is a general lack of awareness that cigarettes and/or filters are commonly made of plastic and the consequential environmental harm that littering these items can cause.

Based on the weight of a standard cigarette butt and most recent information on consumption, Australia generates nearly 3,500 tonnes of plastic waste from consuming single use cigarettes. It has been suggested that up to two-thirds of this amount is littered into our environment.

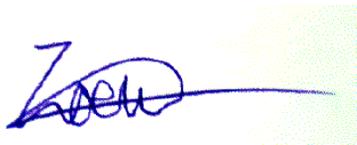
For the aforementioned reasons, we support the view of No More Butts, that plastic tobacco filters and cigarette butts are a problematic single-use plastic item. We strongly encourage the federal government to take action to address this issue under the National Plastics Plan.

Incorporating targeted actions to reduce the amount of cigarette butts through the National Plastics Plan is likely to result in the following benefits:

- Reduction in littering of single use plastics
- Elimination of the creation of micro plastics
- Reduction in harm from marine life from ingestion of toxic plastics chemicals
- Improvement in water quality

A reduction in the amount of litter would also have a positive impact on flora and fauna as well as soil quality. It would also lessen the financial burden currently worn by tax-payers and local government for clean-up and prevention costs.

Your sincerely

A handwritten signature in blue ink, appearing to read 'Zoe White', is written over a light green rectangular background.

Zoe White
Resource Recovery Education and Compliance Officer

Encl.

Hon Tanya Plibersek MP
Minister for Environment and Water
11 July 2023

Dear Minister,

We would like to register our support for the submission by No More Butts in response to the consultation paper on the exposure draft of the Bill and Regulations for Public Health (Tobacco and Other Products) 2023.

In our experience, which includes several decades of work raising the alarm on plastic pollution, cigarette butts in particular, we believe it is time for the Government to take further action on this environmental scourge.

This draft bill gives the Commonwealth Government an opportunity to take once-in-a-decade action on some of the biggest environmental impacts of tobacco products through the revisions in this Health legislation package.

We support the following proposals made by No More Butts:

- Inclusion of environmental warnings on inserts and retail packaging of tobacco products
- Inclusion of environmental warnings on cigarette sticks (“DON’T LITTER”)
- Inclusion of environmental warnings on filter tip paper (“PLASTIC”)
- The use of recycled cardboard and inks that enable further recycling for retail packaging
- The removal of the plastic film and tear strip
- Investigating changing the colour of the filter tip from cork to a colour that is more noticeable when littered, such as bright pink
- The ban of plastic tobacco filters, or a provision to enable a future ban

Cigarette butts are the most littered item in Australia, with those butts contaminated with an estimated 7000 chemical compounds able to pollute soil, the environment and harm wildlife.

We note that the Belgian Superior Health Council recently joined the World Health Organization in calling for a ban on tobacco filters, noting that the filter provides no health benefit for smokers.

A reduction in the amount of litter would have a positive impact on flora and fauna as well as soil quality. It would also have a positive impact on the financial burden currently worn by taxpayers for the clean-up costs.

Signed



Jeff Angel
Director



Toby Hutcheon
Campaign Manager



Conservation

Activism
Research
Education

Protecting Waves and Beaches

1st July 2023

The Hon Tanya Plibersek MP - Minister for Environment and Water

Dear Minister Plibersek,

This letter is to support the submission by No More Butts in response to the consultation paper on the exposure draft of the Bill and Regulations for Public Health (Tobacco and Other Products) 2023. In our experience [expand if necessary], the environmental impacts caused by tobacco products are immense. The Commonwealth Government has an opportunity to take once-in-a-decade action on some of the biggest environmental impacts of tobacco products through the revisions in this Health legislation package.

We support the following proposals made by No More Butts:

- * Inclusion of environmental warnings on inserts and retail packaging of tobacco products
- * Inclusion of environmental warnings on cigarette sticks ("DON'T LITTER")
- * Inclusion of environmental warnings on filter tip paper ("PLASTIC")
- * The use of recycled cardboard and inks that enable further recycling for retail packaging
- * The removal of the plastic film and tear strip
- * Investigating changing the colour of the filter tip from cork to a colour that is more noticeable when littered, such as bright pink
- * The ban of plastic tobacco filters, or a provision to enable a future ban

Continued.....

With cigarette butts being the most littered item in Australia, the plastic tobacco filters have a negative impact on both health and the environment, including the ocean. Cigarettes are known to contain 7,000 chemicals, most of which are trapped in the filter and pollute water and soil when they are littered into the environment. One cigarette butt can pollute up to 40 litres of water, killing marine life.

We note that the Belgian Superior Health Council recently joined the World Health Organization in calling for a ban on tobacco filters, noting that the filter provides no health benefit for smokers. A reduction in the amount of litter would have a positive impact on flora and fauna as well as soil quality. It would also have a positive impact on the financial burden currently worn by tax payers for the clean up costs.

Yours Sincerely,



Susie Crick – President South Coast Branch

0425244172

5th July 2023

The Hon Tanya Plibersek MP
Minister for Environment and Water

Dear Minister Plibersek,

This letter is to support the submission by No More Butts in response to the consultation paper on the exposure draft of the Bill and Regulations for Public Health (Tobacco and Other Products) 2023.

In our experience, including monthly citizen science clean ups of local beaches and waterways, the plastic fibre butts (discarded filters) are our top three items collected (the others being soft plastics and hard plastic pieces). For many of our clean ups, the soft plastic packaging “film” from cigarette packaging makes up a high fraction of the total soft plastics. At one regular site (200m section) we find hundreds, and to give you an idea from one specific clean up (Brighton le Sands, 300m² (60 m X 5 m) we found 3366 butts! Our data shows to us that “butts” are our most littered item that come from stormwater AND in situ litter source. Butts are ubiquitous litter – on days we find nothing else, there will be butts. Many users do not realise the butts are made from cellulose acetate, perhaps explaining why so many are littered with decades of thinking that butts were just “paper” – but in fact they are plastic fibres filled with toxins that leach into the environment. The soil, sand, and water these butts encounter become polluted with their chemicals (and the fibres). The following proposals will not only provide the public knowledge and awareness what these butts are made from and the environmental affects, but also aim to stop the source of them as a littered item and reduce the pollution consequences including removing the plastic as a component in the first place.

The environmental impacts caused by tobacco products are immense. The Commonwealth Government has an opportunity to take once-in-a-decade action on some of the biggest environmental impacts of tobacco products through the revisions in this Health legislation package. Independent research shows that filters do not make smoking healthier. The industry markets filters to make cigarettes seem safer, but they can increase the harms of smoking, including when smokers inhale and ingest the plastic fibres found in filters.

We support the following proposals made by No More Butts:

- Inclusion of environmental warnings on inserts and retail packaging of tobacco products
- Inclusion of environmental warnings on cigarette sticks (“DON’T LITTER”)
- Inclusion of environmental warnings on filter tip paper (“PLASTIC”)
- The use of recycled cardboard and inks that enable further recycling for retail packaging
- The removal of the plastic film and tear strip
- Investigating changing the colour of the filter tip from cork to a colour that is more noticeable when littered, such as bright pink
- The ban of plastic tobacco filters, or a provision to enable a future ban.

With cigarette butts being the most littered item in Australia, the plastic tobacco filters have a negative impact on both health and the environment, including the ocean. Cigarettes are known to contain 7,000 chemicals, most of which are trapped in the filter and pollute water and soil when they are littered into the environment. One cigarette butt can pollute up to 40 litres of water, killing marine life.

We note that the Belgian Superior Health Council recently joined the World Health Organization in calling for a ban on tobacco filters, noting that the filter provides no health benefit for smokers. A reduction in the amount of litter would have a positive impact on flora and fauna as well as soil quality. It would also have a positive impact on the financial burden currently worn by tax payers and volunteers for the clean up costs.

Yours sincerely,
Sarah-Jo Lobwein
Founder SO SHIRE and Plastic Free Sutherland Shire
info@soshire.org
0414763269



sustainability performance reputation

14 December 2021

Shannon Mead

No More Butts

shannon@nomorebutts.org

Re: Priority product stewardship listing

Dear Shannon,

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

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

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

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

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

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194 Varsity Parade, Varsity Lakes Queensland 4227 Tel: +61 4 04 899 961

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

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

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

Yours sincerely



Nicholas Harford
Managing Director



NOMOREBUTTS®

Contact information

Shannon Mead
Founder & Executive Director
contact@nomorebutts.org

