



ACN: 641916903

95 Tallowood Place, Black Mountain QLD 4563

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**Cameron Colebatch**

Director, International and Domestic Plastics Policy Section, DCCEEW

**By email:** Cameron.Colebatch@dcceew.gov.au

**CC:** International.Plastics@dcceew.gov.au

**Including tobacco filters as a potential element in the legally binding instrument to end Plastic Pollution**

Dear Cameron,

In advance of the second session of the Intergovernmental Negotiating Committee on Plastic Pollution, I wanted to provide you with a summary of the impact of cigarette filters and a position to consider taking into the negotiations, should the opportunity arise.

Cigarette filters are an unnecessary, toxic plastic, causing harm to both the environment and human health. The [Belgian Superior Health Council](#) has recently joined the [World Health Organization's previous recommendation](#) in calling for a ban of plastic tobacco filters.

Tobacco filters should be defined under the list of **problematic** and **avoidable** plastic products in an annex to the instrument, as proposed as an option in Section II.F.41.e in the [Options Paper](#).

With up to 15 years of tobacco filters accumulating in the environment, consideration should be given under Section II.A.19.b, as to how to hold industry accountable for remediation of the environment.

In addition to attending Australian stakeholder meetings and providing feedback to the Department, No More Butts also made a stakeholder [pre-submission](#) for INC-2. We have been a regular attendee on the HAC webinars over the past month and have been engaged by Stop Tobacco Pollution Alliance ([STPA](#)), convened by The Global Center for Good Governance in Tobacco Control ([GGTC](#)) and Action on Smoking and Health ([ASH](#)).

As an accredited observer of UNEA of the UNEP, I will be in attendance in Paris later this month and could brief you and other delegates further, face-to-face. I would also be happy to undertake any administrative duties on a voluntary basis in Paris, if so required.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Shannon Mead', is written over a light blue horizontal line.

Mr. Shannon Mead  
Founder & Executive Director  
**No More Butts Ltd**  
[shannon@nomorebutts.org](mailto:shannon@nomorebutts.org)  
+61 411 868 275

# NOMOREBUTTS®



## Tobacco filters: an unnecessary and problematic plastic

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

A Local Environment Quality Survey of England 2017/18 showed that 52% of smokers who smoke every day thought putting a cigarette down the drain was acceptable and 39% of smokers admitted to throwing a cigarette butt down a drain within the past month<sup>4</sup>. Globally, it has been reported that 40% of discarded cigarette butts make it into our oceans and waterways<sup>5</sup>.

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

We support a ban on all single use plastics that are problematic and unnecessary. This specifically includes the cellulose acetate cigarette filter, which is found on nearly all commercial cigarettes.

Biodegradable or recyclable alternatives would have no advantage in terms of health concerns.

Instead, they might encourage improper cigarette butt disposal, which would continue to contaminate the environment with toxic tobacco chemicals.

Using the littering rates and the average weight of a cigarette butt<sup>10</sup>, it can be estimated that at least 350 thousand tonnes of plastic tobacco filters end up in waterways globally each year. With 15 years of litter accumulating, up to 5.3 million tonnes of cigarette butts could currently be in our waterways. According to Macedo et al., 2011 and Santos et al., 2005, cigarette butts could accidentally be ingested by some marine species (such as fish, birds, and whales) during feeding. There is also research to suggest they enter our food stream<sup>11</sup>.

Additionally, a World Health Organization paper highlights research that has shown that harmful chemicals leached from discarded butts, which include nicotine, arsenic and heavy metals, can be acutely toxic to aquatic organisms<sup>12</sup>. With over 7,000 chemicals<sup>13</sup> and research showing that each butt can contaminate up to 40 liters of water<sup>14</sup>, a San Diego State University suggested that the chemicals leached from one smoked cigarette butt were capable of killing half of the fish present in a one-liter bucket of water<sup>15</sup>.

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

<sup>2</sup> Ibid.

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

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

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

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

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

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

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

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

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

<sup>12</sup> Ibid.

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

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

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

Cigarette butts and tobacco's plastic waste are within the scope of plastics policies including the upcoming global plastics treaty negotiations. While policy development in the environmental sector encourages broad multi-stakeholder involvement, including the private sector, the tobacco industry should be excluded in line with existing global tobacco control treaty obligations (Article 5.3 of the WHO FCTC), United Nations principles and policies (HLM NCDs, UN global Compact, WHO FENSA, etc.), as well as corresponding practices.

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

In May 2022, the WHO called for the ban of plastic cigarette filters<sup>16</sup>. Indeed, research has shown that filtered cigarettes have caused an increase in lung adenocarcinomas among smokers<sup>17</sup> and there are also suggestions that these plastic fibers can be ingested by smokers<sup>18</sup>.

In April of 2023, at the request of the Belgian Environment Minister, the Belgian Superior Health Council tabled a report that concluded that cigarette filters do not reduce harmful effects of smoking yet do pollute the environment<sup>19</sup>.

The Belgian Environment Minister asked the Superior Health Council to report on the effectiveness of tobacco filters on human health. The report was conclusive:

*"Filters in cigarettes do not actually reduce the harmful health effects of smoking. From a public health perspective, they do not offer any benefit, while they pollute the environment,"* said the expert report by the Superior Health Council.

### **Further research**

Belgian Superior Health Council: [The Impact of Cigarette Filters on Public Health and the Belgian Environment](#)

No More Butts: [Submission into Parliamentary Inquiry into Plastic Pollution in Australia's Oceans and Waterways](#)

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<sup>16</sup> <https://www.who.int/news/item/31-05-2022-who-raises-alarm-on-tobacco-industry-environmental-impact>

<sup>17</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6059254>

<sup>18</sup> <https://exposetobacco.org/campaigns/cigarettes-are-single-use-plastics>

<sup>19</sup> [https://www.health.belgium.be/sites/default/files/uploads/fields/fpshealth\\_theme\\_file/20230511\\_shc\\_9726\\_cigarette\\_filters\\_vweb.pdf](https://www.health.belgium.be/sites/default/files/uploads/fields/fpshealth_theme_file/20230511_shc_9726_cigarette_filters_vweb.pdf)