



JOINT SUBMISSION

31 March 2026

City and Environment Directorate - Waste Policy
ACT Government
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By email: singleuseplastics@act.gov.au

RE: Problematic Products and Single-Use Plastic Reduction Discussion Paper

This statement is supported by organisations from the health, environmental, and community sectors (see Appendix for the full list of organisations).

No More Butts welcomes the opportunity to present a joint submission as part of the Australian Capital Territory (ACT) Government's review of single-use plastics regulation. We are a member of the Boomerang Alliance, an accredited observer to the United Nations Environment Programme (UNEP) and hold Special Consultative Status with the United Nations Economic and Social Council (ECOSOC). As recognised subject-matter experts in tobacco-related pollution, we provide this feedback to ensure ACT policy aligns with emerging global action.

Cigarette filters represent one of the most visible and persistent gaps in current plastics regulation and we are encouraged that they are included in the list of fourteen products being considered for a ban as part of this discussion paper. This action would propel ACT into a global leadership position.

Executive Summary

Cigarette filters are a high-prevalence, single-use plastic product and the most littered individual item in the ACT and Australia. Estimates indicate approximately 8.9 billion cigarette butts are discarded annually in Australia, with each one containing up to 15,000 cellulose acetate plastic fibres.

Filters provide no demonstrated health benefit to smokers yet represent a significant and preventable source of environmental pollution. Cigarettes historically functioned without filters, and the filter itself is an unnecessary design feature. While cigarette filters are predominantly made from cellulose acetate, the issue is not limited to the material used, but the continued sale and widespread littering of filtered cigarettes.

The ACT's 10R framework for a circular economy correctly prioritises Refuse, Rethink and Reduce as the highest order of action. Because cigarette filters provide no medical benefit and are a "deceptive design feature," they represent a prime candidate for the 'Refuse' tier. As filters are not an essential component of cigarettes, but a product design choice introduced by manufacturers, the highest-order circular response is to refuse the filter itself, rather than substitute it with another material. By the sale of filtered cigarettes, the ACT Government would avoid the problematic product entirely and prevent a "perverse outcome" where one single-use item is simply replaced by another.

Given their scale, persistence, toxic load and absence of health benefit, cigarette filters represent a uniquely preventable source of pollution. Led by No More Butts, the undersigned recommend regulatory reclassification of cigarette filters as a "problematic and unnecessary plastic" and a legislated phase-out culminating in a ban on the sale of filtered cigarettes in the ACT by December 2027.

Scale

Based on data collected from 31 locations across the territory, the Clean Up Australia FY25 Litter Report highlights that cigarette butts made up 45.4 percent of all recorded litter in the ACT¹. Nationally, cigarette butts account for approximately 23.6 percent of all recorded litter items¹.

Separate national estimates indicate that around 8.9 billion cigarette butts are discarded in Australia each year², equivalent to roughly 17,000 cigarette butts littered every minute. Further research from the Commonwealth Scientific and Industrial Research Organisation (CSIRO) in 2025 identified cigarette butts as a common form of plastic pollution in urban environments.³

Each cigarette filter contains tightly packed cellulose acetate fibres that progressively shed microplastic fragments through mechanical abrasion and ultraviolet degradation⁴. Cigarette filters typically consist of approximately 12,000–15,000 cellulose acetate fibres, which can detach and disperse into aquatic and terrestrial environments as filters fragment⁵. When extrapolated from the estimated 8.9 billion littered cigarette butts annually in Australia, it equates to a potential release of between 107 and 133.5 trillion plastic fibres into the environment every year.

The cellulose acetate in cigarette filters is engineered to resist biodegradation and can persist in environmental conditions for many years⁴. Independent research confirms that this material can take up to 30 years to degrade under standard environmental conditions⁵.

Educational campaigns and voluntary litter reduction programs have demonstrated limited effectiveness because cigarette butt pollution is intrinsic to the product design and consumption model⁶.

Toxicity

Cigarette filters function as concentrated carriers of toxic residues, accumulating heavy metals, nicotine and combustion by-products during smoking.

Used cigarette filters accumulate toxic substances including heavy metals (cadmium, lead and arsenic), nicotine residues and polycyclic aromatic hydrocarbons (PAHs)⁷. Laboratory studies demonstrate that cigarette butt leachate can rapidly release toxic chemicals into aquatic environments and cause acute toxicity to fish and other organisms⁸.

Deceptive Design

Microplastic particles and fibres have been detected in human lung tissue and human blood, demonstrating environmental exposure pathways to plastic contamination⁹⁻¹⁰. Laboratory studies show that microplastics can trigger inflammatory and cytotoxic responses in human immune cells⁸. Health authorities including the WHO have identified inhalation and ingestion as key human exposure pathways for microplastic particles¹¹. Public health authorities including the World Health Organization (WHO) and Doctors for the Environment Australia conclude that cigarette filters do not reduce smoking-related morbidity or mortality¹²⁻¹³.

Through a letter to No More Butts in February 2026, NSW Health noted that they support the decision at the WHO Framework Convention on Tobacco Control (FCTC) that cigarette filters are unnecessary and provide no health benefits and notes the WHO FCTC recommendation to consider strong regulations on cigarette filters considering their public health impacts. The WHO characterises cigarette filters as a “deceptive design feature” that promotes a false perception of reduced harm¹².

Filter ventilation technologies alter smoking behaviour and are associated with increased risk of lung adenocarcinoma due to deeper inhalation of smoke¹⁴.

Momentum within Australia

In addition to support indicated by NSW Health, the NSW EPA's *Plastics: The Way Forward* consultation identifies cigarette filters as a problematic plastic waste stream¹⁵. In September 2024 the South Australian Legislative Council passed a motion calling on the State Government to raise cigarette waste and tobacco industry responsibility at the next meeting of national environment ministers¹⁶.

International Momentum

International policy discussions increasingly recognise cigarette filters as a single-use plastic product subject to regulatory intervention. The urgency of this phase-out is underscored by the UK Government's landmark progress on 9 March 2026, where the third reading of the Tobacco and Vapes Bill passed the House of Lords, including adopted amendments that grant the Secretary of State powers to prohibit the manufacture and supply of cigarette filters to end 'filter fraud' and mitigate plastic waste¹⁷. The European Commission has just closed a consultation on tobacco filters as part of a review of the Single-Use Plastics Directive¹⁸. These actions reflect growing international recognition that the problem lies with the filtered cigarette design itself, rather than solely the plastic material used in filters.

Recommendations

1. Regulatory classification

Formally designate cigarette filters as a problematic and unnecessary plastic and announce a phase out on the sale of filtered cigarettes. During this transition period retailers and distributors would be permitted to sell through existing stock while preparing for compliance.

2. Territory Phase-Out

Prohibit the importation, manufacture and sale of filtered cigarettes within the ACT, regardless of the filter material, by 31 December 2027.

3. National Coordination and Harmonisation

Support the existing call by South Australia to request cigarette filters are added to the agenda of the Environment Ministers Meeting (EMM).

Yours sincerely,

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Appendix – Alphabetical list of supporting Companies and Groups

