Dear Secretariat,

No More Butts extends our gratitude to the Chair and the INC Secretariat for the preparation of the revised Draft Text and to the Government of Canada for hosting us in Ottawa. We appreciate the opportunity to provide a written Statement to the Secretariat for INC-4.

No More Butts is a subject matter expert on the environmental impacts of tobacco related waste, including cigarettes and vaping devices.

Anyone who has walked the streets of Ottawa in the past few days will see that cigarette butts are the most prevalent item of litter. Over four and a half tonnes of cigarette butts will be littered across Ottawa during our time at INC4. This equates to 23 million butts over 8 days, or just under 3 million butts per day and forms part of the 8,000 tonnes of cigarette butts reported to be littered annually in Canada.

Cigarette butts are a problematic and avoidable plastic of concern.

Made from cellulose acetate, these tobacco filters are the single most littered form of plastic pollution by count. Estimates suggest that up to 4.5 trillion plastic cigarette butts are discarded into the environment every year, creating at least 300,000 tonnes of plastic pollution globally.

Cigarette butts are carried in stormwater runoff through drainage systems and eventually to local streams, rivers, and waterways. With each butt reported to pollute 40 liters of water, they are acutely toxic to marine life.

When released into nature, including water and soil, they persist for up to 15 years. As such, cigarette butts must be included in discussions when considering remedies and mechanisms for addressing existing plastic pollution as part of the Treaty.

Containing thousands of fibrous microplastic fibers each, we need to commit to eliminating the release of this secondary form of microplastics.

Known to contain 7,000 chemicals, including ones that are proven to cause cancer, used tobacco filters (cigarette butts) contain contaminants such as cadmium, arsenic and lead, as and PAHs and should also be considered in discussions around chemicals of concern.

We must ensure a dual focus of human health and environmental health. There is no evidence that tobacco filters provide benefit to human health and in fact, they are reported to have potential to cause harm to human health.
Tobacco disproportionately affects indigenous communities and severely impact youth and women through the harm caused.

No More Butts calls for a **ban on tobacco filters** as well as a **ban on single-use, disposable vapes**.

We’d like to call the attention of delegates to Article 18 of the World Health Organization (WHO) Framework Convention on Tobacco Control (FCTC), which signatories adopted at the recent COP10 in Panama. Amongst other objectives, this Article calls on signatories to implement strategies to minimize the impact of tobacco products on the environment. This specifically notes the Plastic Treaty process as a vehicle for member states to implement changes to meet their obligations, including considering comprehensive regulatory options regarding filters in cigarettes.

We are available to any member states and observers that wish to learn more about this issue. Further information on the environmental impacts of cigarette filters are available through UNEP Perspectives Issue 45.

Kind regards,

Shannon Mead
Executive Director
**No More Butts Ltd**