Dear Secretariat,

No More Butts thanks the INC Chair and the Secretariat for proposing the structure of work this week and wishes to acknowledge the Co-Chairs of the Contact Groups and Co-Facilitators of the Sub Groups for their hard work in the technical streamlining of the revised draft text and for supporting collaborative discussions.

We wish to express our views in support of some interventions made during SG1.2 on the 26th April regarding cigarette filters, which are a problematic and avoidable plastic of concern.

We support the members who called for cigarette filters to be included as a problematic plastic as part of discussions of Part II: 3a, especially when considering an Annex to define the criteria and products.

We also support the call for a dedicated program of work for cigarette filters under Part II: 4bis, as noted in the session summary.

We would also like to specifically respond to a Conference Room Paper (CRP) that proposes an Annex X that could be used for the establishment of Annex B regarding plastic products that could be considered for elimination.

We would like to propose that members consider taking action, not only where action has already been implemented in member states, but also in line with a proposed criteria in identifying the products that warrant immediate action.

Using the proposed criteria, we wanted to specify why cigarette filters need to be included:

1. *Its manufacturing requires chemicals that pose a hazard to human health or the environment, or the product itself poses a hazard to human health or the environment;*

   Known to contain 7,000 chemicals, including ones that are proven to cause cancer, used cigarette 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. So, although the filter may not contain hazardous chemicals at productions, we don’t believe this should mean they are excluded as a consequence, given the toxicity upon consumption and littering.

2. *Not reusable or recyclable in practice and at scale;*

   As a subject matter expert, our own research shows us that there is currently no scalable solution to recycle cigarette butts.
3. **Can be avoided (or replaced by a reuse model) while maintaining its utility;**

   The World Health Organization has determined that cigarette filters are an avoidable product. There is no evidence that they provide any benefit to human health. Cigarettes without plastic filters were sold until the introduction of cellulose acetate filters. It is important to note that swapping to any substitute product would still result in litter and leaching of toxic chemicals into the environment. A complete ban on all types of cigarette filters is the preferred option.

4. **Hinders or disrupts the recyclability of other items**

   Cigarette filters are acutely toxic. Often entering general waste and recycling streams, the residue of chemicals and heavy metals can contaminate other waste streams and the recyclability of products such as plastic bottles.

5. **Has a high likelihood of ending up in the natural environment**

   Cigarette butts (the result of consumption of a cigarette through a cigarette filter) are the most littered item on the planet. 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.

No More Butts seeks other member states to support these positions as textual negotiations continue. We remain available to any member state and observers that wish to learn more about this issue.

Kind regards,

Shannon Mead  
Executive Director  
No More Butts Ltd  
shannon[at]nomorebutts.org