Part B: Input on the potential areas of intersessional work to inform the work of INC-3

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<th>Name of organization (for observers to the committee)</th>
<th>No More Butts</th>
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<tbody>
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<td>Date of submission</td>
<td>13th August 2023</td>
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Dear Secretariat,

No More Butts appreciates the opportunity to provide a submission on potential areas for intersessional work out of the INC-2 Contact Groups. Below, we provide specific information relating to potential areas of intersessional work as an outcome of CG1.

**Summary**

Tobacco filters are toxic, ubiquitous, problematic and avoidable.

Made from cellulose acetate, tobacco filters (known as cigarette butts), 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. They take between ten and 15 years to break down and release toxic chemicals and create tens of thousands of fibrous microplastics per filter. They are easily 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 also acutely toxic to marine life.

Prioritizing tobacco filters as a problematic and avoidable (unnecessary) plastic product to ban under an established criteria is an important step as part of the Treaty process. We ultimately call for an outright ban on the distribution and sale of plastic tobacco filters that are currently used in substantially all cigarettes sold globally.

With cigarettes being known to contain 7,000 chemicals, including several proven to cause cancer, used tobacco filters (cigarette butts) contain contaminants that should also be considered in discussions around consumption of chemicals of concern.

Similarly, as they contain over ten thousand microplastic fibers, we need to commit to the eliminating the release of this form of plastic waste to water, soil and air.

Persisting in nature for up to 15 years, tobacco filters must be included in discussions when considering remedies and mechanisms for addressing existing plastic pollution as part of the Treaty.
We must ensure a dual focus of human health and environmental health. Reported to have the potential to cause harm to smokers, there is no substantial evidence that tobacco filters provide a benefit to human health.

We offer the opportunity to provide scientific research and further statements as a submission for any Intersessional meetings related to the development of the criteria to help members conclude on the necessity to support a ban on tobacco filters.

As many member states are a part to the World Health Organization’s Framework Convention on Tobacco Control (“FCTC”), we encourage all delegates to proceed with Treaty negotiations noting that the tobacco industry should not play a role, either directly, or indirectly in these negotiations.

Feedback

Contact Group 1

Information on definitions of, e.g. plastics, microplastics, circularity

It is important that there is clarity on the definition on key terms including plastic. References by members often specifically reference polymers of concern, whereas the coverage of plastic needs to be much broader. Specifically, tobacco filters are made from cellulose acetate and are an example of a material which is thermoplastic and is not produced by polymerization of any monomer. Therefore, cellulose acetate may be considered as a semi-synthetic or regenerated polymer and may not automatically be identified as a polymer of concern.

As the most littered form of plastic waste in the world, we need to ensure that the definition of Plastic includes all forms of plastic, including plastic tobacco filters.

Information on criteria, also considering different applications and sectoral requirements, including:

In addition to being a problematic and avoidable plastic of concern in their own right, when a cigarette is consumed, the single-use tobacco filters accumulate chemicals, such as lead, cadmium and arsenic, as well as bisphenol A.

It should be noted that the best way to design for the environment, is to design out plastic waste. In this case, there is no substitute required for a plastic tobacco filter in order to work. The removal of the filter would be the desired outcome for both the environment and human health.

Potential substances of concern in plastics, problematic and avoidable plastic polymers and products

Made from cellulose acetate, tobacco filters are a problematic and avoidable product.

When used as specified, tobacco filters trap substances of concern in the filter, which is then littered into the environment.

It is therefore important that tobacco filters are discussed as a problematic and avoidable plastic / product as part of any intersessional work.
Potential sources of release of microplastics (applications and sectors).

There are primary and secondary sources of release of microplastics. For tobacco filters, they are littered as cigarette butts.

Tobacco filters are comprised of approximately 12,000 cellulose acetate strands, a fibrous plastic. When littered, the filter starts a cycle of photodegradation, releasing these microplastic strands into the environment as a secondary form of release of microplastics.

These microplastics hold toxic chemicals that are absorbed into the strands during the process of smoking. The release of these microplastics pollute soil and water. In addition to the risk of direct inhalation of these microplastic through product use by the consumer, they can enter the food chain by ingestion.

The development of criteria to prioritise problematic and avoidable plastics

It should be made clear in the development of a criteria that the criteria should relate to any and all problematic and avoidable plastics.

If the plastic is considered problematic under a Definition (scale, toxicity and overall impact to environmental and human health) and is considered avoidable (research indicating that it is not necessary for a product to function), it should automatically be considered on this list.

The Belgian Superior Health Council recently published a report that highlighted tobacco filters do not provide any health benefit to smokers and are therefore unnecessary. As a result, they can be reasonably considered as avoidable. As a cigarette does not require a filter for a cigarette to work and it provides no benefit to the consumer it can therefore be prioritized.

In addition to being the most littered plastic in the world, after consumption, tobacco filters contain chemicals and heavy metals, many of which are listed as chemicals and issues of concern. As such, they should be considered problematic.