

## Response ID ANON-WGGP-UEDZ-D

Submitted to Call for evidence on commonly littered and problematic plastic items  
Submitted on 2022-02-11 18:38:34

### Introduction

1 Would you like your response to be confidential?

No

Blank free text box for answer:

2 What is your name?

Name:  
Bradley Myers

3 What is your email address?

Email:  
bradley.myers@ash.org.uk

4 It would be helpful for our analysis if you could indicate which of these sectors you most align yourself/your organisation with for the purpose of this consultation (please tick one which is most applicable to you):

non-governmental organisation

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5 If you are responding on behalf of an organisation, what is its name?

Organisation:  
Action on Smoking and Health (ASH)

### Wet wipes

6 Would you support a ban on wet wipes containing plastic? You will be asked about possible exemptions in the following questions.

Not Answered

Blank free text box for answer:

7 In the case of a ban on wet wipes containing plastic, would you support there being some exemptions for wipes used for medical purposes? Medical uses of wet wipes include patient care, spill absorption, and to clean equipment and surfaces. You will be asked about additional exemptions in the next question.

Not Answered

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8 As well as wipes used for medical purposes, are you aware of any uses or situations in which the use of wet wipes containing plastic is essential and could be considered for any exemptions in future legislation? Please give reasons and provide supporting evidence.

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Not Answered

9 Are you aware of the water industry's Fine to Flush standard?

Not Answered

10 If you answered yes to question 9, do you think the current water industry 'Fine-to-Flush' standard is effective in reducing sewer blockages caused by wet wipes?

Not Answered

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11 Do you support a mandatory 'flushability' standard for wet wipe products placed on the market to indicate more clearly which wipe products are truly flushable?

Not Answered

Blank free text box for answer:

12 Do you support mandatory labelling on packaging about disposal and the impact of wet wipe products on the environment?

Not Answered

Blank free text box for answer:

13 Would you support an extended producer responsibility scheme for wipes containing plastic? If so, how might this operate?

Not Answered

Blank free text box for answer:

14 What alternatives are there to single-use plastic wet wipes, including wipes made from non-plastic materials? We would welcome evidence on the cost of these alternatives, their environmental impact and any issues that could be caused by increased use of them.

Not Answered

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## Tobacco filters

15 Do you support the government taking regulatory action to tackle littering of tobacco filters?

Yes

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Action on Smoking and Health (ASH) supports the implementation of a statutory Extended Producer Responsibility (EPR) scheme to tackle the littering of tobacco filters. The significant environmental harm caused by cigarette filter litter (see responses to questions 18 and 19) requires a regulatory response.

A) A regulatory approach set out in statute is required by our obligations as a party to the WHO FCTC

The responsible Minister in DEFRA set out in a letter to ASH on 6th October 2020 that, "any scheme through which the tobacco industry could potentially invest in tackling smoking related litter in this country must be developed in accordance with the WHO Framework Convention on Tobacco Control (FCTC), the FCTC guidelines and the Local Government Declaration on Tobacco Control. In particular it must be legally enforceable, restricting the tobacco company's ability to promote their relationship or contribution to it."

The guidelines to Article 5.3 [1], referred to by the Minister, and which the UK has adopted, do not permit any branch of government or public sector body to "accept, support, or endorse partnerships and non-binding or non-enforceable agreements as well as any voluntary arrangement with the tobacco industry or any entity or person working to further its interests" [2]. The Local Government Association's (LGA) position is that any involvement with a non-regulatory scheme for tobacco litter by local authorities would not be acceptable" [3].

B) Co-regulation would not meet our WHO FCTC obligations

In the US, which is not a party to the WHO FCTC, a co-regulatory approach is being considered. Federal lawmakers have introduced the Break Free From Plastic Pollution Act [4] requiring producers to design, manage, and finance waste and recycling programmes and the state of California is considering Senate Bill 424 [5], requiring manufacturers to collect and recycle filters or reimburse household hazardous waste facilities for the costs of collection and recycling. However, a co-regulatory EPR scheme, like a voluntary scheme, would contravene the UK's obligations under Article 5.3 of the WHO FCTC (see above). A co-regulatory scheme would require local authorities and tobacco firms to work side by side to manage litter. A co-regulatory scheme would also risk allowing tobacco firms to engage in "greenwashing" [6], where firms use environmental activities with only minimal benefits to divert attention from the overall negative environmental impact of their business. To allow the industry to organise and lead litter management would risk allowing the industry to profit from the false impression that the industry is leading efforts to solve this problem when in fact it is responsible for it.

C) Voluntary schemes have failed to deliver

Not only would a voluntary scheme not be appropriate given the requirements of the FCTC, but voluntary approaches have been unsuccessful to date in resolving the problem of littering of tobacco filters.

As the Minister stated in her letter to ASH, "despite being called to account on many occasions, the industry has not been willing to seriously engage in tackling smoking related litter to date". A voluntary scheme in Australia, where the New South Wales Department of Environment recently commented that it had "not translated into widespread reduction of cigarette butt litter" [7].

A study published last year by the World Wildlife Fund for Nature Australia [7] found that a regulatory EPR scheme would have the greatest potential

environmental benefit of all possible policy solutions to managing tobacco litter in Australia. The conclusion was that a regulatory scheme would have “high impact” and could “expand the collection, recovery and processing of cigarette butts, as well as research and development for improved recovery, processing and design, and scale up public awareness efforts”.

#### References

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16 If the government takes forward an extended producer responsibility (EPR) scheme to tackle cigarette littering, which of the following costs related to managing of littered tobacco filters, if any, do you think should be covered by producers?

campaigns aimed at promoting responsible disposal, provision of bins and management of binned filters, clearing up ground litter and subsequent treatment, data gathering and reporting

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Blank free text box for answer:

Tobacco manufacturers, as the producers, should be required to pay for the direct and associated costs of the entire process for managing tobacco litter, including education, prevention, clean-up, treatment, and data gathering and reporting. To quote the DEFRA minister in her letter to ASH on 6th October 2020, “We believe the tobacco industry should be investing sufficient sums to remedy the litter caused by its products. This is the very minimum of what is required from these companies in line with the polluter pays principle.”

17 Are there other regulatory approaches that government should consider?

Blank free text box for answer:

A: Prohibition of cigarette filters should be considered

Serious consideration should be given to prohibiting cigarette filters, which have not been proven to deliver significant health benefit and cause substantial environmental damage.

Cigarette filters are predominantly made of cellulose acetate, a single-use plastic which is not easily bio-degradable. Cigarette butts are the most commonly discarded waste product in the world and are a major source of toxic hazardous waste in the environment [1].

Cigarette filters were introduced onto the market in the 1950s, after research was published showing smoking caused lung cancer, and that there was a dose response relationship between exposure to tar and incidence of tumours. The tobacco manufacturers’ response put ‘filters’ on cigarettes [2], marketing them heavily as a healthier option [3]. Within 5 years filtered cigarettes made up 50% of cigarettes smoked in the US, going on to make up over 95% by the 1990s [4], and the UK market saw similar changes.

However, the conclusion of a review of the evidence published by the US National Cancer Institute in 2001, was that “There is no convincing evidence that changes in cigarette design between 1950 and the mid 1980s have resulted in an important decrease in the disease burden caused by cigarette use either for smokers as a group or for the whole population” [5].

Furthermore the tobacco manufacturers knew that filters which significantly reduced the tar and nicotine levels actually inhaled by human smokers made cigarettes unattractive to them [6]. The solution they found was filter ventilation, which was introduced onto the market at the same time as the regulators started testing the amount of tar, nicotine and carbon monoxide delivered by cigarettes. When smoking machines draw a puff from the cigarette, the ventilation holes draw in air, thereby diluting the smoke so the machine measures low tar levels. But smokers do not smoke like machines: they smoke harder and block the holes in the filters to take in higher levels of nicotine and therefore tar, a process known as ‘compensation’ [7]. Furthermore the ventilation makes cigarettes taste lighter and milder, reinforcing the idea that they are less dangerous. This was the low tar myth, which the industry knew, but didn’t tell the regulators. By the 1990s nearly all factory made cigarettes on sale in the US had filters and most were ventilated [7].

The industry not only knew that cigarettes with filters were not safer, but they also manipulated the design of filters to enhance public perceptions that they were. This was done by adjusting the pH in cellulose-acetate based filters to produce discolourations in the filter during smoking. To quote the chemist who discovered this, “The cigarette smoking public attaches great significance to visual examination of the filter material in filter tip cigarettes after smoking the cigarettes. A before and after smoking visual comparison is usually made and if the filter tip material, after smoking, is darkened, the tip is automatically judged to be effective. While the use of such colour change material would probably have little or no effect on the actual efficiency of the filter tip material, the advertising and sales advantages are obvious” [8].

The US National Cancer Institute and Federal Drugs Administration funded an evidence-based causation analysis published in 2017. A weight-of-evidence review of published scientific literature and internal tobacco company documents (experimental and human studies) was used to provide a comprehensive overview of filter ventilation in relation to lung adenocarcinoma. The outcome was a recommendation that “the US Food and Drug Administration (FDA) should embark on a regulatory process of data evaluation and consider regulation(s) for the use of ventilation in filters, up to and including a ban on their use” [6]. DEFRA and DHSC should investigate what the evidence now is supporting a ban on filters in cigarettes. Serious consideration should be given to prohibiting cigarette filters, which do not provide significant health benefit and cause substantial environmental damage.

#### B. Ending smoking is the long-term solution

In 2019 the Government’s prevention green paper set an ambition to go ‘smoke-free’ in England by 2030, defined as 5% or less adult smoking prevalence, which will significantly reduce the problem. The Government also issued an “ultimatum for industry to make smoked tobacco obsolete by 2030”, which once achieved will eliminate filter litter [9].

However, the most recent survey data shows that in 2021 smoking prevalence in England was 14.2% [10]. And at current rates of decline Cancer Research UK has calculated that the Smokefree 2030 ambition won’t be achieved until 2037 in England, and not until 2047 for our most disadvantaged communities [11].

That is why the All Party Parliamentary Group on Smoking and Health, alongside ASH and many other organisations, are calling for the introduction of a “polluter pays” statutory scheme to require tobacco manufacturers to fund measures to reduce smoking prevalence and improve public health [12]. This is consistent with, and would be complementary to, the statutory EPR scheme on tobacco litter we have outlined above.

#### References

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18 What are the financial costs of managing waste tobacco filters? Please give supporting evidence including quantified data where possible.

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The Government estimates the financial cost of managing waste tobacco filters to be £40m each year in England [1]. In 2017, Highways England reported collecting 411 bags of litter every day from roads across England, with cigarette butts one of the most commonly littered items, at a cost of £40 per bag [2]. ASH’s Ready Reckoner cost of smoking calculator, which is based on Annual Population Survey data from 2019, estimates that 1,248 tonnes of cigarette butts are discarded as street litter annually [3]. In Britain findings from a recent DEFRA commissioned survey conducted by Keep Britain Tidy found that cigarette butts make up two thirds (66%) of litter items found in Britain. Globally, cigarette filters have been identified as the most widespread litter item worldwide over the past two decades, with an estimated 4.5 trillion cigarettes littered into the environment [5].

#### References

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19 What are the environmental impacts of waste cellulose acetate tobacco filters, including those associated with inappropriate disposal? Please give supporting evidence.

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There are numerous harmful environmental impacts of waste cellulose acetate tobacco filters, all of which are exacerbated by its incorrect disposal [1]. Cellulose acetate filters biodegrade slowly, losing only 38% of mass on average in two years of decomposition [2] and taking up to 14 years to fully decompose [3,4]. This leaves more time for its harmful environmental effects to take hold when it is incorrectly disposed of. Cigarette filters are a particularly harmful consumer product as they combine plastic pollution with a high degree of toxicity [5]. Cigarettes are infused with 4,000 – 7,000 toxic substances, with a portion of them causing significant harmful to the environment [6]. The compounds found in cigarette filters have two primary environmental effects, killing and harming aquatic life when transported into water bodies by urban runoff and affecting plant growth and harming and killing terrestrial life when contaminating soil after leaching by rainwater [see 1 and 5 for an overview].

A 2020 review of the 26 peer-reviewed studies on aquatic life published since 2006 found that cigarette butts were associated with significant premature mortality amongst a variety of invertebrates and vertebrates in the vast majority of such studies [5]. A number of sublethal effects have also been observed, such as alterations to behaviour and changes to reproductive output across a range of aquatic organisms [see 5]. These effects are most pronounced when a cigarette has been smoked and discarded but unsmoked cigarettes can also cause toxic effects due to toxic plasticisers. There have been fewer studies of the terrestrial effects of cigarette filter litter but those that do exist show that the effects are equally as harmful [7,8,9]. Three studies have analysed effects on plant growth and have found that cigarette butts impact germination, cause reductions in shoot length, root biomass, and change chlorophyll content. Selmar et al. found knock-on effects of these impacts on food webs with effects on biodiversity and pollination by insects [10]. A number of further studies have investigated the effects of cigarette butts on terrestrial vertebrates and invertebrates, with effects observed on growth, physiological responses including food and water consumption, and predator avoidance behaviour [see 5 for overview]. Birds have been found to incorporate butts into nests, affecting hatching success and damaging DNA [11,12].

#### References

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20 What are the environmental impacts of tobacco filters made from alternative materials to cellulose acetate, including those associated with inappropriate disposal? Please give supporting evidence.

Blank free text box for answer:

The tobacco industry has tried to counter this body of evidence by claiming that modern biodegradable filters are “eco-friendly”, “green”, and mitigate these harms [1]. However, researchers have found that such claims should be treated cautiously, with little evidence supporting them and some evidence that biodegradable filters leach as many harmful chemicals into the environment if discarded improperly as conventional filters [2,3]. The decomposition rate of biodegradable filters still remains largely unknown, but it is estimated that biodegradable cigarette butts would take 2.3 – 13 years to disappear in compost or soil surface, only a slight reduction on the 7.5 – 14 years of smoked conventional cellulose acetate butts [4]. Likewise the environmental impact of biodegradable filters also remains largely unknown, but a 2020 study which simulated a marine environment found that leaching from biodegradable butts killed exactly the same percentage of invertebrates tested as did conventional butts in the research [3]. Other studies have shown that leachate from biodegradable butts may have a relatively higher concentration of potentially harmful metals than conventional butts [5].

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21 What are the environmental impacts of smoking alternatives such as heated tobacco, disposable e-cigarettes, vape pods and oral nicotine pouches, including those associated with inappropriate disposal? Please give supporting evidence.

Blank free text box for answer:

Cigarette filters, the main source of tobacco litter, have been around since 1950, over 70 years and there is a great deal of evidence about their environmental impact. In contrast the smoking alternatives set out above have been around for less than twenty years, and much less is known about their environmental impact. As a first step DEFRA should commission a systematic review of the evidence, including grey literature as well as peer reviewed research.

### Single-use plastic sachets

22 What environmental impacts do single-use plastic sachets have? What is the evidence in support of your view?

Blank free text box for answer:

23 Are you aware of any alternatives to single-use plastic sachets? Do you have any evidence to support that these alternatives are more environmentally friendly than single-use plastic sachets?

Blank free text box for answer:

24 Do you support consulting on introducing a ban of single-use plastic sachets used for:

Blank free text box for answer:

25 Do you support consulting on introducing a charge on single-use plastic sachets used for:

Blank free text box for answer:

26 Are you aware of any other uses of single-use plastic sachets that could be considered for banning or introducing a charge on?

Blank free text box for answer:

27 Are you aware of any uses or situations in which the use of sachets is essential and could be considered for exemptions in any future legislation? What is the evidence in support of your view?

Blank free text box for answer:

### Single-use cups

28 Would you support the government consulting on a proposal to introduce a charge for single-use cups?

Not Answered

Blank free text box for answer:

29 Do you think this charge should be for both hot and cold drinks?

Not Answered

Blank free text box for answer:

30 Do you think this charge should apply to businesses of all sizes?

Not Answered

Blank free text box for answer:

31 Are you aware of any situations where the use of a single-use cup is essential and could be considered for exemptions from the charge in the future? E.g., because of business location, business type, type of product in the cup. Please give reasons and supporting evidence.

Blank free text box for answer:

## Additional items

32 Please state any further single-use plastic items that you think should be considered for targeted future policy actions, and your reasons for this.

Blank free text box for answer:

33 Regarding any additional items that you have provided, are you aware of any environmentally friendly alternatives that could be used instead?

Blank free text box for answer:

## Re-use and Refill

34 What are the barriers to reuse and how could they be addressed? Please provide any supporting evidence.

Blank free text box for answer:

35 What are the barriers to refill and how could they be addressed? Please provide any supporting evidence.

Blank free text box for answer:

36 How can government incentivise increased reuse and refill?

Blank free text box for answer:

37 How could businesses incentivise customers to support reuse and refill?

Blank free text box for answer:

38 Please provide information about any successful case studies of reuse and refill.

Blank free text box for answer:

39 Would you support the government consulting on regulating that restaurants cannot provide customers with any single-use products in eat-in settings? The existing exemption for straws would remain.

Not Answered