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12<sup>th</sup> April 2024

**Committee Secretary**

Senate Standing Committees on Environment and Communications  
PO Box 6100  
Parliament House  
Canberra ACT 2600

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**RE:** Inquiry into waste reduction and recycling policies

Dear Committee Secretariat,

[No More Butts](#) appreciates the invitation to provide evidence to the Senate Standing Committee as part of the Inquiry into waste reduction and recycling policies.

No More Butts is a subject matter expert on tobacco related waste. We were formed to tackle Australia's most littered item: cigarette butts, and have a vision for a 'butt free environment'. We are an ACNC registered charity and are on the Register of Environmental Organisations. Coordinating multiple functions from research, to being engaged as a consultant by peak bodies, we also perform programmatic work on a pro bono basis for councils and other environmental organisations.

We have submitted to, and participated in, several Commonwealth and State consultations and focus groups, including the International Plastic Pollution Treaty, the National Plastic Pollution Portal and the Parliamentary Inquiry into Plastic Pollution in Australia's Oceans and Waterways, as well as tobacco and vaping reform consultations.

No More Butts is a member of the Boomerang Alliance, the UNEP Global Partnership on Plastic Pollution and Marine Litter, and Break Free From Plastic. Since 2020, we have presented on the impact of cigarette butt litter and vaping waste at more than a dozen conferences. Our article on the impacts of tobacco filters on the environment was published by the United Nations Environment Programme in February 2024.

The inputs by No More Butts in response to the Terms of Reference of the Inquiry are limited to our area of expertise and detailed in the following pages. Our response is not confidential, and names do not need to be withheld.

Please don't hesitate to contact the undersigned if you wish to discuss any of the evidence or have any further questions about our submission.

Yours faithfully,

Mr. Shannon Mead  
Founder & Executive Director  
**No More Butts Ltd**

## The progress on the implementation of mandated product stewardship schemes

Around the world, there is growing momentum for product stewardship and extended producer responsibility schemes for **cigarette butts** and other tobacco products.

On March 4th 2021, Trevor Evans, the former Assistant Minister for Waste Reduction and Environmental Management, along with Sussan Ley, as Federal Minister for the Environment, announced that, as part of the [National Plastics Plan 2021](#), an action would be taken to address the issue of plastics in cigarette butt filters.

Specifically, Action 4 noted that the Australian Government would initiate an industry-led, cross-sectoral stewardship task force to reduce cigarette butt litter in Australia, and consider potential stewardship schemes.

It may also be important to note that tobacco filters were not included in the [2018 National Waste Policy](#) despite being able to help deliver key priorities under the [National Waste Policy Action Plan 2019](#), specifically in addressing Target 5, which is to phase out problematic and unnecessary plastics by 2025.

Submissions to the 2021-22 Commonwealth Minister for the Environment's product stewardship priority list overwhelmingly called for federal action on cigarette butts. Despite the planned action and the calls from stakeholders, so far there has been no progress.

In late June 2022, No More Butts spoke with several Department representatives who advised that due to considerations under Article 5.3 of the WHO Framework Convention for Tobacco Control (FCTC), the approach to the formation of the task force may need to be reconsidered. In December 2022, after being prompted for an update to share in this submission, the same representatives confirmed that there hasn't been any progress on Action 4.

In early 2023, the Minister for the Environment noted that she stood ready to regulate the industry, if the industry would not take action itself<sup>1</sup>.

### Removal of cigarette filters

At the top of the waste hierarchy, designing out waste is the preferred option of product stewardship initiatives.

In May 2022, the WHO articulated their view that there is no evidence that filters provide any health benefit to consumers and should be banned<sup>2</sup>. This supports the position from No More Butts that tobacco filters are a problematic and unnecessary single use plastic and should be banned.

Removing filters would also assist in the achievement of Target 2 to reduce total waste generated by 10% per person by 2030. Recommendations would also go towards addressing threats highlighted in the Reef 2050 Plan around water quality and marine debris.

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<sup>1</sup> <https://www.theguardian.com/australia-news/2023/feb/08/war-on-cigarette-butts-coalition-plan-to-reduce-pollution-never-existed-tanya-plibersek-says>

<sup>2</sup> <https://www.who.int/news/item/31-05-2022-who-raises-alarm-on-tobacco-industry-environmental-impact>

In April of 2023, at the request of the Belgian Environment Minister, the Belgian Superior Health Council tabled a report that concluded that cigarette filters do not reduce harmful effects of smoking yet do pollute the environment<sup>3</sup>

In February 2022, UK DEFRA closed submissions for their consultation into plastic tobacco filters. The EU recently implemented a “filter contains plastic” label on sales of all cigarette packets, helping to increase awareness of the potential impact of the smokers’ decision to litter their butt after finishing their cigarette.

Across Europe, as well as in California, The Netherlands, and Canada, programs of varying degrees are already being implemented. The United Kingdom announced their Smokefree Plan in November 2023, which will restrict access to cigarettes and have a positive impact on the environment.

### **Litter Levies**

San Francisco has a history of collecting litter taxes from retailers, along with charging tobacco companies for the cost of cleaning up, charging retailers 1.25 USD per packet of cigarettes sold, which is passed on to the consumer.

### **Circular initiatives**

If plastic filters remain in cigarettes, initiatives should be put in place to restrict cigarette butt litter and create a supply chain for the collection. These actions would go towards Target 3 to recover 80% of all waste by 2030. In this case, cigarette butt filters should be considered in the list of eligible products for the [Recycling Modernisation Fund](#). Exports should also be formally regulated under the [Recycling and Waste Reduction Act 2020](#). Further, the use of filters in [Products made with recycled content](#) would help address Target 4 of the National Waste Policy Action Plan 2019. Research can be validated through potential [Cooperative Research Centres Project Grants](#).

In Canada, social enterprise, TerraCycle, has implemented a refund scheme to encourage smokers and the community to return their cigarette butts and prevent them from entering waterways. With strong examples of CDS implementations across Australian states, this could be a consideration.

### **Recommendations**

- *Ensure the round table event initially proposed in the National Plastic Plan is delivered. It is recommended that the tobacco industry is excluded from this event. No More Butts is available to provide support in the delivery of this action.*
- *Request the Office of Impact Analysis performs a study on the removal of tobacco filters from cigarettes.*

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<sup>3</sup> *ibid*

## The efficacy and progress on circular economy deliverables

As cigarette butt filters are made of plastic, this creates opportunities for the recycling, or upcycling, of cigarette butts.

Although the preference should be to design for environment and therefore design out the waste, if the Commonwealth Government won't take action on the most littered item by banning it, then research is a critical step to identifying circular initiatives for this pervasive product.

TerraCycle, a global social enterprise, already has a commercially scaled model based in America.<sup>4</sup> They process the cellulose to a stage where it can be sold as a low-grade plastic, which can be used in the creation of new plastic materials, such as park benches and ashtrays.

An Australia company created a prototype plastics mixer, however they have sent this to Europe, although they are planning to license this technology within Australia.<sup>5</sup>

RMIT in Australia has over 15 years of research to consider shredded cigarette butts as a composite material in clay-fired bricks.<sup>6</sup>

In 2021, No More Butts has engaged a mycologist to investigate using a trained species of oyster mushrooms to break down the cellulose in the filters and assist to remove some of the toxins.<sup>7</sup>

In 2021, No More Butts received an endorsement from a large Australian construction supply company to trial using cigarette butts as a composite material for concreting projects such as bus stops, asphalt and pavements. No More Butts has also been engaging with research institutes on using cigarette butts, along with other problematic items, as a composite in other construction materials.

Since 2022, No More Butts has worked with students at RMIT on six different projects to look at alternative uses for cigarette butt waste. There is provisional research on using activated carbons from cigarette butts in CO2 capture, uranium removal, and soil remediation (biochar).<sup>8</sup> An open, competitive grant scheme would see the awarding of feasibility studies, pilots, and implementation programs until adequate stream(s) can be commercialised. Outcomes of the research projects will support the objectives of sustainable procurement, re-manufacturing, recycling modernisation and waste export bans.

Despite multiple grant applications and thousands of volunteer hours, there has still been no investment from the government in investigating circular initiatives for the most littered item in the country.

### Recommendation

- *If there is no intention to phase out plastic cigarette filters, the Australian Government should invest in research and trials for circular initiatives for everyday hard-to-recycle items, including cigarette butts.*

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<sup>4</sup> <https://www.terracycle.com/en-US/brigades/cigarette-waste-recycling>

<sup>5</sup> <https://plastechrecycling.com/product-development/>

<sup>6</sup> <https://www.rmit.edu.au/news/media-releases-and-expert-comments/2020/sep/cigarette-butt-bricks>

<sup>7</sup> <https://wollongong.nsw.gov.au/my-community/news-and-alerts/news/news/2021/november-2021/how-to-train-your-oyster-mushroom-no-really>

<sup>8</sup> [https://www.gjesm.net/article\\_244343\\_fcde85da8dee9e3596e05af2c0a3322b.pdf](https://www.gjesm.net/article_244343_fcde85da8dee9e3596e05af2c0a3322b.pdf)

## **Recycling export regulations imposed through the Recycling and Waste Reduction Act 2020, noting the benefits and consequences of imposing the requirements on the Australian industry**

We can only speak with certainty and clarity around tobacco product waste. Whilst the approach to restricting the transboundary movement of waste should be applauded, it is clear the bans have only created confusion for the specific products that we track. The bans have created risks around stockpiling of cigarette butts and vaping devices, which have generated concerns around environmental and human health.

### **Cigarette butts**

Since July 1 2022, after the export of waste plastics was regulated, it's been unclear what has happened to cigarette butts that have been diverted from landfill. Prior to 2021, cigarette butts were aggregated by TerraCycle through a couple of major contracts with EnviroCorp. They were sent offshore for recycling, mainly by plastic extrusion. The cigarette butts were then pelletised and sold as a resource in overseas markets to make products such as ashtrays and park benches.

We understand that since the ban, butts collected for recycling have been stockpiled in Australia as there are no commercially available recycling methods. This was validated in March 2024 by a community organisation using their service. We have already highlighted potential circular initiatives, however, it would be good to get clarity on what has been happening to cigarette butts in the past few years, how many there are in storage, and what risks (if any) they pose.

### **Vaping devices**

As there are different e-waste landfill regulations across the country, vaping devices are being treated differently from a waste management perspective. When waste export bans were initiated, vaping devices were not a priority item, nor were they consumed in the quantities that they are now.

We understand that it is not financially viable to disassemble vaping devices in Australia as they often contain an embedded battery, as well as contain hazardous or toxic substances, including nicotine. However, without a national waste management scheme in place, they are being littered, landfilled, or shredded without coordination.

According to EPA Victoria, it's illegal to landfill vapes in Victoria, but it's also illegal to stockpile batteries. In other states, it's legal to landfill e-waste, so vapes are disposed of in landfill, without consideration for leachate or other environmental dangers.

Some vaping devices that have been intercepted at the border are being shredded by specific companies, but this means that unused lithium-ion batteries are being destroyed without any of the energy being captured.

In our submission to the 2022-23 Budget Pre-submissions and well in advance of reaching the prevalence that it currently has, No More Butts noted that there needed to be funding in the budget for a disposal scheme for vaping devices.

### **Recommendation**

- *The Commonwealth Government needs to implement an effective disposal scheme to address all vapes. The most logical approach is to fund the existing B-Cycle scheme to include the receipt and end-of-life management of vaping devices.*

## Other relevant matters

### Intergovernmental Negotiating Committee on Plastic Pollution

In March 2022, at the resumed fifth session of the UN Environment Assembly (UNEA-5.2), a historic resolution was adopted to develop an international legally binding instrument on plastic pollution, including in the marine environment.<sup>9</sup>

The resolution (5/14) requested the Executive Director of the UN Environment Programme (UNEP) to convene an Intergovernmental Negotiating Committee (INC) to develop "the instrument," which is to be based on a comprehensive approach that addresses the full life cycle of plastic, including its production, design, and disposal.<sup>10</sup>

The INC began its work during the second half of 2022, with the ambition to complete the negotiations by the end of 2024. The first session of the INC (INC-1) took place in Punta del Este, Uruguay from 28 November to 2 December 2022, followed by a second session (INC-2) from 29 May to 2 June 2023 in Paris, France, and a third session (INC-3) from 13 to 19 November 2023 in Nairobi, Kenya.<sup>11</sup>

The fourth session (INC-4) is scheduled for 23 to 29 April 2024 in Ottawa, Canada, and the fifth session (INC-5) on 25 November to 1 December 2024 in Busan, Republic of Korea.<sup>12</sup>

Waste management is a key topic of negotiations and this Treaty will set the way for future generations to deal with transboundary waste management, as well as designing out waste itself, through restrictions on the amount of plastic produced and consumed.<sup>13</sup>

#### Recommendation:

- *Australia should continue our active participation in the Intergovernmental Negotiating Committee for a Plastics Treaty and lead the way as part of the High Ambition Coalition for an effective Plastics Treaty.*

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<sup>9</sup> <https://www.unep.org/inc-plastic-pollution/>

<sup>10</sup> ibid

<sup>11</sup> ibid

<sup>12</sup> ibid

<sup>13</sup> ibid