

Public Consultation on the:  
*Waste Action Plan for a Circular Economy*



ROYAL COLLEGE OF  
PHYSICIANS OF IRELAND



In submission to:

Waste Action Plan Consultation  
Waste Policy & Resource Efficiency  
Department of Communications, Climate Action  
& Environment  
Newtown Road  
Wexford  
Y35 AP90  
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Date of submission:

Supported by:

RCPI Policy Group on Tobacco  
Institute of Public Health in Ireland

## Background

The Royal College of Physicians of Ireland Policy Group on Tobacco and the Institute of Public Health collaborate to provide evidence-based policy advice to inform tobacco control. Together, we welcome the Department of Communications, Climate Action & Environment in addressing tobacco waste as a part of the *Waste Action Plan for a Circular Economy*.

Evidence suggests that there are over 7000 chemicals contained in cigarettes, and many of them toxic such as ethyl phenol, heavy metals and nicotine. At least 50 are known human carcinogens; others have been found to be toxic to marine and freshwater organisms and poisonous to human and animal health<sup>1</sup>. An increasing body of evidence suggests that disposal into local landfills or incineration is not considered safe and warrant close monitoring and proper disposal<sup>2</sup>.

Addressing tobacco waste supports the goal of reducing tobacco consumption to less than 5% of the population by 2025. This was the commitment made by the government via the Tobacco Free Ireland. The *Waste Action Plan* also has significant potential to contribute to government commitments set out in the following national frameworks and policies:

- *Healthy Ireland: A Framework for Improved Health and Wellbeing (2013-2025)*
- *WHO Framework Convention for Tobacco Control (2003)*
- *Tobacco Free Ireland (2013)*
- *Better Outcomes Brighter Futures: The National Policy Framework for Children and Young People (2014-2020)*

Tobacco use is the single biggest cause of preventable death in Ireland and is a substantial threat to human health as well as the health of our domestic and global environment. Cigarette butts and other postconsumer products from tobacco use are the most common waste elements found globally each year during environmental clean-ups<sup>3</sup>. The cost to the State in responding to cigarette waste is estimated to be near €69 million per year<sup>4</sup>.

The combined environmental and health burdens of tobacco use should be critical considerations given the extensive harms to the environment, and implications for the health service. In 2013, it was estimated that 5,950 premature deaths could be attributed to cigarette use and exposure to second-hand smoke, totalling over 200,000 hospital episodes. The average cost to the health service is estimated to be over €460 million per year due to smoking related illnesses and deaths<sup>5</sup>.

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<sup>1</sup> Curtis, C., Novotny, T.E., Lee, K., Freiberg, M. and McLaughlin, I., 2017. [Tobacco industry responsibility for butts: A Model Tobacco Waste Act](#). *Tobacco Control*, 26(1), pp.113-117.

<sup>2</sup> Curtis, C., Novotny, T.E., Lee, K., Freiberg, M. and McLaughlin, I., 2017. [Tobacco industry responsibility for butts: A Model Tobacco Waste Act](#). *Tobacco Control*, 26(1), pp.113-117.

<sup>3</sup> Novotny, T.E. and Slaughter, E., 2014. [Tobacco product waste: an environmental approach to reduce tobacco consumption](#). *Current environmental health reports*, 1(3), pp.208-216.

<sup>4</sup> Kearney, J., 2016. [An assessment of the economic cost of smoking in Ireland: A report submitted by ICF International & DKM Economic Consultants](#)

<sup>5</sup> Kearney, J., 2016. [An assessment of the economic cost of smoking in Ireland: A report submitted by ICF International & DKM Economic Consultants](#)

## Recommendations

1. The Department may consider developing a Tobacco Waste Act to ensure that legislation maximises both health and environmental gains from reduced tobacco use and removes any scope for voluntary compliance from the tobacco industry. For your consideration, a draft model of the Tobacco Waste Act has been published in the 2016 Special Edition of *Tobacco Control*<sup>6</sup>.
2. The evidence supports a coherent and comprehensive approach to managing tobacco waste in Ireland that is aligned with national policy. This approach should incorporate a range of evidence based legislative and policy tools such as levies<sup>7</sup> (see appendix), and Extended Producer Responsibility schemes for tobacco products. The World Health Organisation formally recognises the role of extended producer responsibility regulations on the tobacco industry as well as regulations on sales as a valid policy measure.
3. The current draft of the *Waste Action Plan* highlights a commitment to “work with the tobacco industry to establish a full producer responsibility scheme” by January 2023. This should be revisited as under the *WHO Framework Convention for Tobacco Control* under Article 5, Section 3<sup>8</sup>. This policy outlines that the Irish government may not work with the tobacco industry on the development of policy measures. The Department should instead ‘require’ the tobacco industry to establish a full producer responsibility scheme and ensure that a transparent and robust system of enforcement and monitoring is also established.

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<sup>6</sup> Curtis, Clifton & Novotny, Thomas & Lee, Kelley & Freiberg, Michael & Laughlin, I. 2016. [Model Legislation – Model Tobacco Waste Act](#).

<sup>7</sup> RCPI Policy Group on Tobacco (2019). Response to the public consultation on the proposed introduction of new environmental levies. Submitted to Department of Communications, Climate Action & Environment. [Available at Appendix below](#)

<sup>8</sup> World Health Organisation, 2004. *WHO framework convention on tobacco control*. Available at [https://www.who.int/fctc/text\\_download/en/](https://www.who.int/fctc/text_download/en/)

Appendix

# Response to the public consultation on the proposed introduction of new environmental levies



ROYAL COLLEGE OF  
PHYSICIANS OF IRELAND



**Supported by:**

RCPI Policy Group on Tobacco

Institute of Public Health in Ireland

**Date submitted:** 19 December 2019

**Submitted to:**

Environmental Levies Consultation

Environmental Policy Division

Department of Communications, Climate Action & Environment

29-31 Adelaide Road

Dublin 2

# Key Points

## **RCPI Tobacco Policy Group**

- The RCPI Tobacco Policy Group is a group of clinicians committed to reducing tobacco-related harms to health and society. We welcome the opportunity to submit a consultation response to the proposed introduction of the new environmental levies as part of a review of the Environment Fund.
- We welcome the development of additional levies on the non-disposable plastics referred to in the consultation document. However, we recommend that the Department's Environmental Policy Division give similar attention to addressing the environmental impacts of tobacco consumption and waste. For your review, we submit the following evidence to consider the application of a levy on cigarette post-consumer waste and cigarette butts in Ireland.

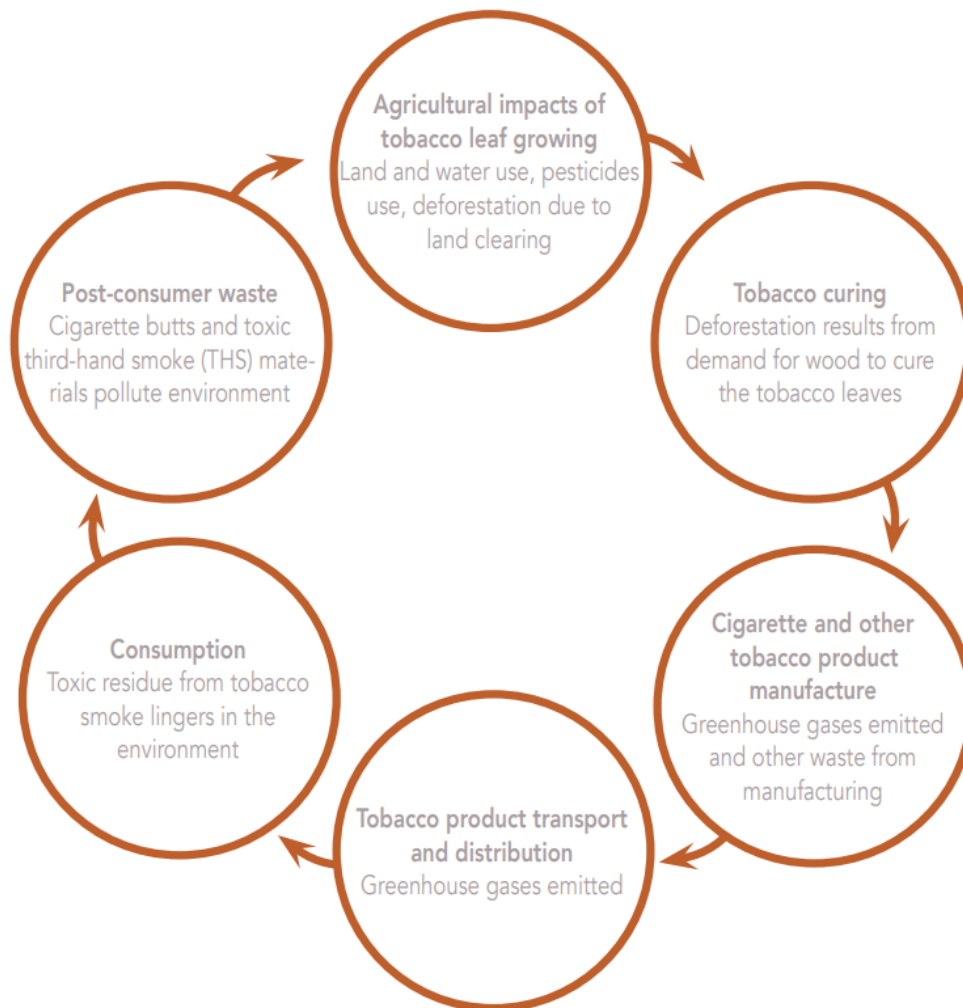
## **Tobacco policy context in Ireland**

- Tobacco use threatens human health as well as the health of our domestic and global environment. It is the single biggest preventable cause of death in Ireland.
- The Irish government has a commitment under the HSE Tobacco Free Ireland Programme strategy to reduce tobacco consumption to fewer than 5% of the population by 2025. In order to achieve this goal, the strategy prioritises the need for government to maximise, “the impact of taxation and pricing on the demand for tobacco products in line with WHO recommendations (HSE Tobacco Free Ireland Programme, 2018).
- Ireland is a signatory to the WHO Framework Convention on Tobacco Control, of which there is a responsibility under Article 18, to mitigate the environmental impacts of tobacco on the broader environment. Article 18 states “In carrying out their obligations under this Convention, the Parties agree to have due regard to the protection of the environment and the health of persons in relation to the environment in respect of tobacco...”
- The environmental consequences of tobacco use and waste are a critical consideration for Ireland in respect SDG Goal 12 *Responsible consumption and production*, a clear driver of the review of the Environment Fund. A levy on tobacco products will also help to address SDG Goal 3A *Ensure healthy lives and promote well-being for all at all ages*.

## Environmental impact of tobacco use in Ireland

- The environmental impacts of cigarettes cause extensive harms to the environment across the lifecycle of tobacco; from production to cultivation farming, to manufacturing, transport and through to consumer waste.

Figure 1: Life cycle of tobacco – from cultivation to consumer waste



(Reference: WHO, 2017)

- Cigarette butts are the most commonly discarded piece of waste globally and pose a serious litter and toxic waste disposal problem. The main component of the waste is the attached cellulose acetate filter which is non-biodegradable. It is estimated that globally trillions of filter-tipped butts are discarded annually. They contain chemicals sourced from agricultural treatments of tobacco plants, uptake from contaminated soils and pesticides, additives instilled in the manufacturing process and combustion products generated in the course of smoking cigarettes. Laboratory evidence suggests that leachates from one cigarette butt can kill 50% of fish exposed, posing a serious impact for marine and aquatic environments (Slaughter et al., 2011).
- Filters were initially introduced by the tobacco industry to create the impression that this made them safer for consumption- this claim was later debunked by evidence (Harris et al. 2011). The filters comprise non-disposable and unrecyclable fibres which eventually break into smaller plastic pieces that drain up to 7,000 different

chemicals – including arsenic, lead, nicotine and ethyl phenol- into land, soil and water. Overall, studies suggest that the longer cigarette butts stay in the environment, the greater the pollution caused. According to Green et al. (2014), one single cigarette butt can contaminate 1000 L of water, posing a concern to urban water sources.

- Third hand smoke is the long-lasting residue resulting from second-hand smoke that accumulates in dust, in objects and on surfaces in indoor environments where tobacco has been smoked, which can end up further polluting the environment via landfills and waste (WHO, 2017). Third hand smoke is especially dangerous for children as they are more prone to staying indoors and have age specific behaviours that expose them to health harming hazards related to third hand smoke (Ferrante et al. 2013).
- Globally, cigarette butts have consistently comprised 30–40% of all items picked up in annual international coastal and urban clean-ups since the 1980s (Araújo and Costa, 2019). In 2014, it was estimated that 340–680 million kg of discarded cigarette waste are sitting in landfills around the world. This does not include the weight of remnant tobacco and other by-products of the discarded waste.
- The cost to the state of responding to cigarette litter in Ireland is estimated to be around €69 million (Kearney, 2016).
- There has been a significant increase in the use of electronic nicotine delivery devices (e-cigarettes) in Ireland. Electronic cigarettes may contain batteries that require special disposal as well as chemicals, packaging and other non-biodegradable materials (Novotny et al, 2015).

### **Rationale for an environmental levy on tobacco products**

- The World Health Organization recommends action on the environmental impact of tobacco including “the implementation of extended producer responsibility regulations on the tobacco industry to reduce, mitigate and prevent manufacturing and post-consumption tobacco product waste (WHO, 2017)”.
- In the last 6 years, recommendations were brought forth by ASH and the Irish Heart Foundation to impose a 50-60 cent environmental levy on the tobacco industry for each 20 pack of cigarettes sold. There is sufficient evidence to support a levy of this nature on the tobacco industry.
- Tobacco manufacturers should be made financially responsible for cleaning up and safely disposing of tobacco product waste. Canada, for example, has recommended a legislative bill that could fine anyone disposing of tobacco products improperly with a fine of up to CAD 3000 (equivalent to €2057) as set out by the Legislative Assembly of Ontario in 2010.

- Other WHO recommended initiatives include banning the sale of single-use, disposable filters, labelling tobacco product waste as hazardous waste and enacting laws that make tobacco manufacturers financially responsible for cleaning up and safely disposing of tobacco product waste.



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