

## **Consultation on reducing single use plastic in Wales – ASH Wales response**

### **Question 1 - Do you support our proposal to ban each of the single use plastic items listed above? If not, please give reasons and where possible evidence to support this view.**

ASH Wales supports Welsh Government's proposal to ban the single use plastic items listed, however, as Wales's leading campaigners on tobacco control we believe the omission of cigarette butts from the consultation is a missed opportunity to tackle one of Wales's most prolifically littered single use plastic items.

ASH Wales believes the European Directive on the reduction of the impact of certain plastic products on the environment should provide the minimum benchmark for action in Wales. The directive states tobacco product filters should, at the very least, be the subject of an Extended Producer Responsibility scheme<sup>i</sup>. It also recognises tobacco product filters as the second most found single-use plastic items on beaches in the Union and despite falling short of subjecting these single use plastic items to a ban, the directive calls on member states to promote a wide range of measures to reduce litter from post-consumption waste of tobacco products with filters containing plastic.

This proposal not only falls short of the EU directive but it fails to recognise the prevalence or impact of tobacco product filters. Failure to recognise the impact or prevalence of tobacco product filters, will only exacerbate the widely held misconception that cigarette butts are a biodegradable product.

Cigarette butts are mostly littered due to uncivil behaviour. There are consumers, who might reduce their littering, if they know that butts are made of plastic.

There are no known health benefits of cigarette filters, they merely act to make cigarette smoke smoother and more palatable<sup>ii</sup>. By making the experience of smoking less harsh, plastic filters make it easier for people to take up smoking<sup>iii</sup>.

Plastic cigarette filters are non-essential consumer items, with the added detriment of making smoking more pleasant for children and young people and should therefore be included in proposals to ban single use plastic items.

### **Question 12 – Are there any other items that should be included in any future proposals to tackle single use plastics? Please give reasons and where possible evidence to support this view.**

Cigarette butts are the most common type of litter on earth, with an estimated 4.5 trillion discarded annually. In a study carried out by Keep Wales Tidy in 2019<sup>iv</sup>, cigarette butts were found on 79.6% of streets across Wales, making them the most common form of litter in the country.

In a 2019 report by the Marine Conservation Society - 32.6 cigarettes butts were found on average for every 100m surveyed on Welsh beaches, and it was the third most prevalent litter type found. Comparison of cigarette data across the Wales shows that compared to 1994, there has been over a 1000% increase. Waiting for smoking prevalence to fall for this problem to be eradicated is not an option.

In Wales today there are 466,827 smokers, representing 18% of the adult population<sup>v</sup>. On average each smoker will smoke around 11 cigarettes a day, equating to more than 5 million cigarette butts being thrown away in Wales every single day. The vast majority of the waste from used cigarettes ends up as litter, either on our streets or in our waterways.

According to a study carried out by Keep Wales Tidy in 2018<sup>vi</sup>, one in ten smokers do not consider cigarette butts to be a form of litter and 10% think they are biodegradable. Meanwhile less than half of smokers know that cigarettes contain plastic<sup>vii</sup>.

Cigarette butts take up to 15 years to breakdown and as they do they leach nicotine and heavy metals before turning into microplastic pollution<sup>viii</sup>. The chemical-laden butts are made of a plastic called cellulose acetate and consistently rank number one in litter removed during environmental clean-ups.

The chemicals contained in these cigarette butts pollute our waterways, endangering any animals that ingest them – one cigarette butt left to soak in water for 96 hours will release enough toxins to kill half of the salt or fresh water fish that are exposed to it.

In 2018, research undertaken by the European Commission found that 80 to 85% of marine litter, measured by beach litter surveys, is plastic, with single-use plastic items representing 50% of the total. The top 10 most commonly found SUP makes up 86% of all SUP in beach litter and is responsible for more than half of plastic marine litter.

This research, which is cited in the Welsh Government consultation, ranks cigarette butts as number two in the top 10 most commonly found SUP, just behind drinks bottles, caps and lids. In fact, when looking items littered the number of cigarette butts far outstrip cotton buds, plastic straws and sanitary applications and yet the consultation fails to explore the issue. At present the range of alternative cigarette filters which are less problematic in the environment are limited, however alternatives do exist. In addition filters provide no health benefit, but only serve to make cigarettes more palatable.

However, cigarette butts have been omitted from the consultation on SUP, stifling the debate around solutions. We are disappointed that Welsh Government were not aspirational in this consultation and over the lack of national action to address the issue.

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<sup>i</sup> <https://www.legislation.gov.uk/eudr/2019/904/introduction>

<sup>ii</sup> <https://bmcpublihealth.biomedcentral.com/articles/10.1186/s12889-015-2643-z>

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iii [https://tobaccocontrol.bmj.com/content/tobaccocontrol/11/suppl\\_1/i40.full.pdf](https://tobaccocontrol.bmj.com/content/tobaccocontrol/11/suppl_1/i40.full.pdf)

iv <https://kwt.eu.rit.org.uk/Handlers/Download.ashx?IDMF=25600629-fd94-4f62-9d8c-f6579a0da8e0>

v <https://gov.wales/national-survey-wales-april-2019-march-2020>

vi <https://www.keepwalestidy.cymru/surveys>

vii <https://www.keepbritaintidy.org/>

viii Joly & Coulis 2018 <https://www.sciencedirect.com/science/article/pii/S0956053X17308474>  
“conventional plastic filters take 7.5–14 years to disappear, in the compost and on the soil surface, respectively....cellulose filters take 2.3–13 years to disappear, in the compost and on the soil surface, respectively”