



## Japan Society for Tobacco Control

日本禁煙学会

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### Context:

The UN Environment Assembly adopted a resolution in March 2022 to begin negotiations on an international legally binding treaty to end plastic pollution, aiming to address the full life cycle of plastic, including production, design and disposal. From 13-19 November, INC-3 will take place in Nairobi, Kenya.

### Addressee:



Dear delegate,

We Japan Society for Tobacco Control, a member of the Stop Tobacco Pollution Alliance, call on you, as you negotiate the UN Plastics Treaty, to include an immediate ban on cigarette butts as a key solution to protect human health and the environment. The cigarette kills not only up to half its consumers, but causes an [enormous impact on our environment](#).

Cigarette butts comprise [5-9% of aquatic trash](#) and are the most littered items in the planet with 4.5 trillion littered annually. Cigarette filters, from which cigarette butts are derived, do not reduce tobacco harms and are deemed a deceptive deadly design feature; gives smokers a [false impression of safety](#), when in fact, cigarette filters have been associated with a more aggressive forms of lung cancer.<sup>1</sup>

In addition to emitting thousands of microplastic fibers, cigarette butts emit high levels of chemicals and heavy metals that ; easily contaminating soil and water, and killing even the most resilient aquatic microorganisms and animals.

In its submission for INC-3, ***'WHO supports the immediate ban of plastics in nicotine and tobacco products and where immediate ban is not feasible, a gradual phase out or stringent control of plastics present in tobacco products, electronic delivery systems, and packaging, recognizing them as problematic and avoidable plastics under the treaty.'*** WHO refers in its submission to the [report of the Belgian Superior Health Council](#) which gives a **scientific basis** to ban cigarette filters.

Japan ratified the World Health Organization Framework Convention on Tobacco Control (WHO FCTC) which provides obligations and guidance for governments to counter tobacco industry tactics

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<sup>1</sup> caused by [changes in the toxicants during combustion, increased inhalation](#) of tobacco smoke and [plastic](#)

[fibres falling out](#) of the end of the filter.

with evidence-based tobacco control measures. The WHO FCTC recognizes that the tobacco product is unique in nature, i.e., it kills up to half of its users while providing no health benefit, they are subject to a set of distinct rules, and thus, tobacco would arguably deserve a specific consideration in the Zero Draft of the Plastics Treaty. We Japan Society for Tobacco Control call you to consider these [issues](#) while discussing the Zero Draft:

1. Cigarette filters are **avoidable and problematic plastics that should be immediately banned**
2. Tobacco industry's redesigning of cigarette filters and recycling of cigarette butts cannot be part of a circular economy
3. Cigarette butts should be classified as hazardous plastic waste that requires special handling, taking into account the chemicals of concern that are attached to the filters.
4. Any cigarette filter alternatives or substitutes will remain hazardous and the redesign of cigarette filters could promote tobacco use
5. The Tobacco Industry should not be treated as a "stakeholder" or "responsible producer" but should be made to pay for the pollution.

We call upon you to support the introduction of **an immediate ban on cigarette filters as one of the most avoidable problematic, and hazardous of all plastics** (Annex B).

Please do not hesitate to contact us for any additional information,

Kind regards,

2023/10/31

Manabu Sakuta, Chairman of the Japan Society for Tobacco Control