



## **Protection of the environment and the health of persons (Article 18 of the WHO FCTC)**

### **Report by the Convention Secretariat**

#### **Purpose of the document**

This report is submitted to the Conference of the Parties (COP) to the WHO Framework Convention on Tobacco Control pursuant to decision FCTC/COP10(14), which requested the Convention Secretariat to examine regulatory options regarding the prevention and management of waste generated by the tobacco industry and its products, as outlined in paragraph 2(c), and to identify a number of other matters, as outlined in paragraph 2(e), to be reported to the COP.

#### **Action by the Conference of the Parties**

The COP is invited to note the present report and provide further guidance.

Contribution to the Sustainable Development Goals (SDGs): All SDGs; in particular, SDG 3 and Target 3.a.

Link to Workplan and Budget item: None.

Additional financial implications if not included in the Workplan and Budget: None.

Related document(s): *Regulatory options to prevent environmental harm and pollution across the tobacco product life cycle* (supplementary information).

## Background

1. At its tenth session, the Conference of the Parties (COP) to the WHO Framework Convention on Tobacco Control (WHO FCTC) adopted decision FCTC/COP10(14) on the implementation of Article 18 of the WHO FCTC. In that decision, the COP considered the pollution of soil and water resources by waste from tobacco products and related electronic devices, including filters of cigarettes as well as batteries, plastic cartridges and metals. Moreover, the COP considered the World Health Organization (WHO) World No Tobacco Day 2022 campaign, whose key message was that tobacco contaminates the planet throughout its life cycle, causing deforestation, contamination of water sources and soil degradation, as well as harming human health. It reiterated the call for Parties to promote national and international cooperation to enhance implementation of Article 5.3 of the WHO FCTC in relation to Articles 17, 18 and 19 of the WHO FCTC to reduce tobacco industry interference in tobacco control policies.
2. In decision FCTC/COP10(14), the COP requested the Convention Secretariat:
  - (a) to examine regulatory options regarding the prevention and management of waste generated by the tobacco industry and its products, including a ban on plastic cigarette filters and the management of hazardous waste from cigarettes, based on scientific evidence (paragraph 2(c)); and
  - (b) to identify, in consultation with the WHO FCTC Knowledge Hub for Articles 17 and 18, and WHO, the various plastics used in the manufacture of tobacco products and their packaging, and how – as waste – they harm the environment; the extent to which protection of the environment from harm arising from tobacco product waste and packaging – such as plastics in tobacco products and their packaging – contributes to the implementation of Article 18 of the WHO FCTC; and the options that Parties may have to curb or prevent such harm (paragraph 2(e)).
3. The COP requested the Secretariat to report on these matters to the Eleventh session of the COP.
4. Pursuant to the COP mandate and to inform its work, the Convention Secretariat commissioned a paper titled *Regulatory options to prevent environmental harm and pollution across the tobacco product life cycle*. The paper is available on the WHO FCTC website as supplementary information to this report.<sup>1</sup>
5. It is to be noted that, when appropriate, the present report adds evidence from the recommendations of the *Report of the twelfth meeting of the WHO Study Group on Tobacco Product Regulation, Barcelona (Spain), 10–13 December 2024*.<sup>2</sup>

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<sup>1</sup> [Regulatory options to prevent environmental harm and pollution across the tobacco product life cycle](#).

Geneva: Secretariat of the WHO FCTC; 2025 (accessed 30 July 2025).

<sup>2</sup> Document EB157/14: [Matters for information: report on meetings of expert committees and study groups: report by the Director-General](#). Geneva: World Health Organization; 2025 (accessed 24 June 2025).

## **Plastics used in the manufacture of tobacco products and their packaging, and harms to the environment**

6. Decision FCTC/COP10(14) requests information, as outlined in paragraph 2(e)(i), on the various plastics used in the manufacture of tobacco products and their packaging, and how, as waste, they harm the environment.

(a) The tobacco leaf is shipped to factories where it is processed and manufactured into cigarettes and other tobacco products. For example, for cigarettes, non-tobacco inputs to manufacturing include plastic filters and cigarette paper, as well as boxes, cartons, cellophane and other plastic packaging. As with other manufacturing processes, the direct environmental impacts of tobacco production include emissions due to energy use from manufacturing and other services such as heating, lighting and air conditioning. Disposal of wastewater and solid waste from manufacturing also has environmental impacts. Liquid waste includes tobacco slurries, solvents, oils and greases that originate in the manufacturing processes, as well as waste from building services and facilities that may need special treatment or disposal. Solid waste includes paper, wood, plastics, unusable tobacco, packaging materials and dirt that originate in the manufacturing process.

(b) It is difficult to quantify the specific environmental impact of tobacco manufacturing, given the lack of transparency about production practices by the tobacco industry and its recent efforts to claim environmental improvements (environment, social and governance) in manufacturing. Nevertheless, the tobacco industry incorrectly identifies manufacturing as the most environment-destroying step of tobacco production, when in fact extensive environmental harms exist along the entire tobacco product life cycle.

(c) Several components of tobacco products are toxic waste. Cigarette filters, including the microplastics deposited into the environment by their cellulose acetate content, are a major source of this waste. In addition, plastic components used in both the manufacturing and packaging of other tobacco products, such as smokeless tobacco and heated tobacco products, are additional sources of toxic tobacco product waste.

## **Regulatory options to prevent, curb or manage the waste generated by the tobacco industry and its products**

7. Decision FCTC/COP10(14), in paragraph 2(c), requests the Convention Secretariat for information on regulatory options regarding the prevention and management of waste generated by the tobacco industry and its products, including a ban on plastic cigarette filters and the management of hazardous waste from cigarettes, based on scientific evidence. Decision FCTC/COP10(14) additionally requests information in paragraph 2(e)(iii) on the options that Parties may have to curb or prevent such harm (including environmental harms of the waste from the various plastics used in the manufacture of tobacco products and their packaging).

8. The overall objective of any proposed intervention related to implementation of Article 18 of the WHO FCTC is to reduce the consumption of tobacco not only through demand reduction but also through supply reduction. All demand and supply reduction measures of the WHO FCTC would address environmental harms by preventing or curbing the potential causes of the environmental harms prior to production or use of tobacco.

9. The regulatory options that Parties may consider could be divided into three categories: upstream, midstream and downstream. Other measures, such as those described below, could also be considered.<sup>3</sup>

### Upstream regulatory options

10. Upstream regulatory options address the source of environmental harms and their prevention. Upstream regulatory options include the following:

- (a) adopting a supply reduction approach that aims to reduce the availability of all commercial tobacco products, including – but not limited to – reducing the number of tobacco products available in the market, placing a birth-date based sales restriction on tobacco products to phase out their sale and/or banning the sale of certain tobacco products;
- (b) banning the manufacture (where relevant), import, distribution and sale of filtered cigarettes, in line with a report submitted to the 157th session of the WHO Executive Board in May 2025,<sup>4</sup> which included a recommendation on filters from the *Report of the twelfth meeting of the WHO Study Group on Tobacco Product Regulation, Barcelona (Spain), 10–13 December 2024*, specifically recommending “banning filters to reduce the palatability and appeal of cigarettes, remove consumer misconceptions about filters substantially reducing health harms and reduce a major source of toxic tobacco waste, including the microplastics deposited by cellulose acetate in filters” – a measure also supported by the currently available scientific evidence, as outlined in the supplementary information to this report;<sup>5</sup> and
- (c) banning the use of other single-use plastics in tobacco and other related products.<sup>6</sup>

### Midstream regulatory options

11. Midstream regulatory options address tobacco product waste during the current use of tobacco products. These include:

- (a) reducing the density of tobacco retailer outlets to reduce the availability and location of tobacco retail outlets;
- (b) utilizing a deposit/refund system whereupon a deposit is made with the purchase of a tobacco product and a refund is issued upon return of the post-consumption waste,

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<sup>3</sup> Consideration may be given to the report by the Expert Group on Forward-looking Tobacco Control Measures (in relation to Article 2.1 of the WHO FCTC) (document FCTC/COP/11/6), which also describes some of the measures included in the following paragraphs.

<sup>4</sup> Document EB157/14: [Matters for information: report on meetings of expert committees and study groups: report by the Director-General](#). Geneva: World Health Organization; 2025 (accessed 24 June 2025).

<sup>5</sup> [Regulatory options to prevent environmental harm and pollution across the tobacco product life cycle](#). Geneva: Secretariat of the WHO FCTC; 2025 (accessed 30 July 2025).

<sup>6</sup> In Parties where electronic nicotine delivery systems are classified as tobacco products, banning the sales of electronic nicotine delivery systems or banning the sales of single-use electronic nicotine delivery systems is an additional upstream regulatory option.

although this option has challenges – from safe handling of tobacco product waste returns to limited utility and technology to safely recycle or dispose of this waste;

(c) implementing a waste abatement fee, which could mitigate the cost of managing post-consumption tobacco product waste (for example, cigarette butts) – such as the costs of collecting and processing this waste, as well as other environmental harms from the waste – and would be paid for by the tobacco product manufacturer, and which, while not addressing the source of the waste, could minimize the costs to local jurisdictions associated with cleaning up post-consumption tobacco product waste; and

(d) place-based restrictions on tobacco use, such as outdoor smoking bans in parks and at beaches, which would be expected to reduce post-consumption tobacco product waste in the affected location.

## **Downstream regulatory options**

12. Downstream regulatory options address the most visible parts of tobacco product waste after the tobacco products are consumed. These include the following.

(a) Clean-up/litter collection efforts organize picking up of discarded cigarette butts and other post-consumption tobacco product waste. While they may have some utility in raising public awareness about the environmental harms of tobacco product waste, they have limited ability to address the source of the problem.

(b) Biodegradable filters do not provide a solution, as they would still be discarded into the environment and leach contaminants into the environment. Biodegradable filters would also not address the WHO Study Group on Tobacco Product Regulation recommendation of banning filters to reduce the palatability and appeal of cigarettes; nor would they remove consumer misconceptions about filters substantially reducing health harms. Overall, biodegradable filters are at high risk for tobacco industry “greenwashing” initiatives, which often favour measures with high visibility but low environmental impact. Greenwashing is a deceptive marketing practice that makes a company or product appear more environmentally friendly than it actually is, in an attempt to mislead consumers, investors and the public. It is recalled that the Guidelines for the implementation of Article 5.3 of the WHO FCTC state that there is a fundamental and irreconcilable conflict between the tobacco industry’s interests and public health policy interests, and call on Parties to denormalize and regulate activities described as “socially responsible” by the tobacco industry, including but not limited to activities described as “corporate social responsibility”. Further, the Guidelines for the implementation of Article 13 of the WHO FCTC refer to “corporate social responsibility” activities by the tobacco industry as a form of sponsorship, advertising and promotion, which should be banned.

## **Other measures**

13. Decision FCTC/COP10(14) invites Parties, under Article 19 of the WHO FCTC, to hold the tobacco industry accountable for the damage it causes to the environment. Litigation could be used to hold the tobacco industry accountable for the environmental damage caused by any stage of the tobacco product life cycle, from cultivation to post-consumption waste. The COP will consider a report by the Expert Group on Implementation of Article 19 of the WHO FCTC on Liability, including in relation to environmental matters (FCTC/COP/11/6).

14. Another option to hold the tobacco industry accountable could be to implement extended producer responsibility (EPR) measures, which would collect funds from tobacco companies to mitigate the environmental harms across the tobacco product life cycle. Any EPR system would have to ensure that Parties follow obligations under Article 5.3 of the WHO FCTC – for example, to prevent conflicts of interest and ensure that any EPR system is not used by the tobacco industry as a demonstration of partnership with the government.

15. Classification of tobacco product waste as hazardous waste is an additional option. Hazardous waste classification could allow hazardous waste disposal models to be applied to tobacco product waste, requiring it to be diverted to dedicated waste streams, as appropriate.

### **Approaches to support the implementation, monitoring and enforcement of the regulatory options and measures**

16. Article 12 of the WHO FCTC and its Guidelines for implementation<sup>7</sup> state that each Party shall adopt and implement effective legislative, executive, administrative or other measures to promote public awareness of and access to information regarding the adverse environmental consequences of tobacco production and consumption. Increased public awareness of the environmental harms of the tobacco product life cycle would support increased enforcement and compliance with any regulatory option or measure. One strategy to promote public awareness of the environmental harms is to require warning labels on tobacco product packaging about these harms, or even on the product itself, such as on individual cigarette sticks.

17. A critical component of implementing Article 18 of the WHO FCTC would be to establish tobacco industry reporting and disclosure requirements for information associated with the environmental impacts of the tobacco product life cycle to the appropriate governmental authorities.

### **Contribution to the implementation of Article 18 of the WHO FCTC**

18. Decision FCTC/COP10(14), in paragraph 2(e)(ii), requests information on the extent to which protection of the environment from harm arising from tobacco product waste and packaging, such as plastics in tobacco products and their packaging, contributes to the implementation of Article 18 of the WHO FCTC.

19. Banning the manufacture (where relevant), import, distribution and sale of filtered cigarettes would be a significant step in contributing to the implementation of Article 18 of the WHO FCTC. Beyond filtered cigarettes, banning the manufacture (where relevant), import, distribution and sale of other single-use plastic-containing tobacco products and plastic accessories (such as plastic filters used in non-cigarette tobacco products – for example, little cigars and roll-your-own tobacco) is an additional regulatory option. Beyond filters, banning single-use plastic in all tobacco products (such as waterpipe, smokeless and heated tobacco products) and plastics included in packaging is also a regulatory option that would significantly contribute to the implementation of Article 18 of the WHO FCTC.

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<sup>7</sup> One objective of the Guidelines for implementation of Article 12 of the WHO FCTC is to identify key legislative, executive, administrative, fiscal and other measures necessary to successfully educate, communicate with, and train people on the environmental consequences of tobacco production (including growing, manufacturing and marketing), consumption and exposure to tobacco smoke.

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## **Action by the Conference of the Parties**

20. The COP is invited to note the present report and provide further guidance.

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