

Clive Betts MP
Chair, Housing, Communities & Local Government Select Committee
House of Commons
London
SW1A 0AA

IMPERIAL BRANDS PLC
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www.imperialbrandsplc.com

Wednesday 30 September 2020

Dear Mr Betts,

CIGARETTE AND SMOKING RELATED LITTER

Thank you for your letter dated 8 September requesting information on our efforts to tackle cigarette and smoking-related litter. Imperial Brands plc recognises that it has a duty to protect the natural environment and that we must work to minimise our environmental impacts throughout our value chain.

All consumers have a responsibility to properly dispose of their litter, whether this is cigarette butts and product packaging, chewing gum, drink cans, fast food containers or any other items. We believe the best approach to tackling litter is for key stakeholders, such as tobacco manufacturers, government, environmental bodies, business and local communities to work together to educate and change people's behaviour.

Following the Communities and Local Government Committee recommendation, Imperial Brands plc through its UK entity Imperial Tobacco Ltd, has made available portable ashtrays (also known as stub-tidies) free at the point of sale for adult smokers purchasing tobacco products. These portable ashtrays have been distributed via our sales teams to independent newsagents nation-wide.

In April 2015 Imperial Brands plc launched an innovative pilot scheme aimed at increasing the volume of smoking-related litter collected and recycling used cigarette butts, thereby diverting butts from existing landfill waste streams. We continue to support local litter clean-up initiatives and we are currently evaluating the effectiveness of educational and awareness raising campaigns in other markets to determine the suitability for UK roll out.

Furthermore, through our membership of the Tobacco Manufacturers' Association (TMA), we have:

- supported a 'ballot bin' initiative with social enterprise Hubbub to encourage smokers to dispose of their used butts by voting on topical questions
- collaborated with local authorities, including South Holland District Council, and provided financial and educational support to change consumer behaviour towards littering
- supported the Liverpool and Edinburgh local Business Improvement Districts in assessing existing infrastructure in areas prone to higher levels of cigarette-related litter.

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The TMA is also set to launch a national campaign next month aimed at raising awareness about the need to dispose of cigarette butts appropriately when smokers are outside their homes. Finally, you will be aware that we are currently in discussions with Keep Britain Tidy and the Department for Environment, Food and Rural Affairs regarding the establishment of a 'Smoking Related Litter Task Group' aimed at the prevention of cigarette littering.

We take our responsibilities in the area of product development and environmental impact seriously and for many years we have worked with our material suppliers to research the decomposition process of filters and whether this can be improved. Consumer acceptance and emissions regulations have meant that we are yet to find an alternative material substitute, however we remain committed to researching a new generation of filters. Further information on filters can be found on our Science website¹.

Your sincerely

Lindsay Mennell Keating

Senior Government Affairs Manager

¹ <https://imperialbrandsscience.com/>



PHILIP MORRIS LIMITED

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Clive Betts MP
Chair
Housing, Communities & Local Government Committee
Westminster
London
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1st October 2020

Dear Mr Betts,

Thank you for your letter dated 8th September regarding cigarette and cigarette-related litter.

One of the long-term solutions to cigarette-related litter is to convince people to stop smoking cigarettes and this is why Philip Morris International (PMI) is focused on accelerating the industry's transition away from cigarettes to smoke-free products which, due to their non-burning characteristics, tend to be less likely to be littered.

As of last year, 98% of our R&D spend and 71% of our commercial spending is focused on smoke-free alternatives and thanks to these investments we've managed to convert 15.4 million adult smokers worldwide, including in the UK, to our smoke-free alternatives.

We are clear that smokers need to realise it is unacceptable to drop their litter. The Government is similarly clear about its expectations of the tobacco industry. In response to multiple Parliamentary Questions, the Government has encouraged the industry to take greater responsibility for tackling the litter created by cigarettes and to work with organisations like Keep Britain Tidy (KBT) to achieve this. This was reiterated at both the Tidy Britain APPG in July and again at the smoking related litter roundtable with Minister Pow earlier in September.

Following discussions earlier this year with industry representatives, in June KBT presented us and the Government with an outline proposal to establish a Smoking Related Litter (SRL) Task Group. Operation of this Group was discussed at September's ministerial roundtable and since then we have been waiting for more detail from KBT about the Group, including costs. Late last week this information was shared with us and it has yielded further questions that we will be following up with KBT to enable us to make a better informed decision about our potential involvement with the SRL Task Group.

At the same time as considering KBT's proposal, PMI is continuing to take steps to address littering. For example, we are examining the composition of our products, including researching alternatives to cellulose acetate filters and improving the design of packaging to reduce waste. In 2019, we partnered with Clean Up Britain – a leading anti-litter behavioural change organisation – to research use of portable ashtrays as a potential solution to littering, the findings of which are now being used to develop solutions that are more likely to be adopted by smokers on the move. More recently, in August we announced a global commitment to reduce by 50% the plastic litter from our products by 2025 (vs. 2021). To support delivery of this, we launched our new global anti-littering campaign called Our World Is Not an Ashtray which focusses on education and awareness raising. As with many other countries, our ability to activate this campaign has been curtailed by Covid-19 but we aim now to initiate this in 2021.



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The problem of littering is not unique to our industry. However, PMI is committed to curbing cigarette and smoking related litter and our global commitment to cutting plastic litter means we have a clear and measurable target that we can be held to account against.

We will keep you updated as discussions progress with KBT over the formation of the Smoking Related Litter Task Group.

Yours sincerely

Patrick Muttart
Director, External Affairs UK & Ireland,
PMI UK & Ireland

Clive Betts MP
Chair
Housing, Communities & Local Government Select Committee
House of Commons
London SW1A 0AA

Wednesday 30 September 2020

Dear Mr Betts,

Thank you for your letter dated 8 September. The industry takes very seriously the issue of tobacco-related litter and continues to undertake a range of different programmes and initiatives, to help address the irresponsible disposal of cigarette butts.

Specifically, since the Committee's inquiry in 2015 into "Litter & Fly Tipping", the industry has continued to provide portable ashtrays given out at the point of sale, working with a number of partners, for example, the Scottish Grocers' Federation to produce and distribute them to consumers. In terms of new steps to address littering over the last five years, the TMA has supported the development of innovative ballot bins with the social enterprise Hubbub, encouraging smokers to vote on a topical question and mark their preference through the disposal of their used butts.

In addition, the TMA and the industry has worked with local authorities, where possible, for example with South Holland District Council, providing financial and educational support to change consumer behaviour towards littering. Moreover, the TMA has supported local Business Improvement Districts in Liverpool and Edinburgh to assess the existing litter infrastructure in place and educate consumers in areas prone to higher levels of tobacco litter.

Beginning in October through to the end of the year, the TMA will be implementing a national campaign targeted at those adult smokers who subconsciously throw their butts on the floor. The campaign will focus on raising awareness about the need to reduce littering and ensuring people are aware of their personal responsibility to dispose of cigarette butts appropriately when smoking outside their homes.

TMA companies are also conducting their own anti-littering campaigns and delivering on a series of ambitious, long-term targets to tackle tobacco-related litter (in line with the UK Plastic Pact) and reduce their wider environmental impact.

You referenced in your letter that "cigarette litter remains a serious problem in our communities", and while I fully accept there is a perception that it is an issue, I don't agree that the available evidence provides such clear cut analysis. For example, Keep Britain Tidy's Litter Composition Analysis, undertaken on behalf of Defra, and published in March 2020, found that cigarette butts were responsible for 66% of littered items by count, but only 0.2% of overall litter volume, and of the top-15 most littered items by volume (which accounted for 95% of the total volume of litter) cigarette butts did not make the list.

The preference by some organisations to focus on prevalence of litter over quantity of litter can provide an inaccurate picture on the ground, and is not how waste management data is normally

presented, which focuses on weight-based information which is how collection, management and disposal costs are calculated.

So far in 2020, the industry has invested over £200,000 in schemes and campaigns aimed at preventing tobacco-related litter and we are currently in discussion with Keep Britain Tidy and Defra about funding an independently-run 'Smoking Related Litter Task Group' aimed at the prevention of cigarette littering.

We are committed to continuing to work with all stakeholders to further raise awareness and reduce smoking-related litter.

Yours sincerely,



Rupert Lewis
Director



Clive Betts MP
Chair
Housing, Communities and Local Government Committee
House of Commons
London
SW1A 0AA

30th September 2020

Dear Mr Betts,

Thank you for your letter dated 8th September 2020. A litter-free environment is of benefit to everyone with adult smokers and wider society taking responsibility for ensuring their waste is properly disposed of.

All adult smokers should throw away their cigarette butts responsibly, whether that is in a bin or by using a Stub Tidy/pocket ashtray. Unfortunately, the littering of cigarette butts is often a subconscious behaviour with some adult smokers even discounting them as litter. JTI takes the matter of smoking-related litter seriously and has funded a number of initiatives in recent years designed to raise awareness and encourage adult smokers to dispose of their cigarette butts correctly.

- Between 2014 and 2018, JTI worked in partnership with the Campaign to Protect Rural England (CPRE). Throughout this period over 100,000 pocket ashtrays were given away to adult smokers at shops and festivals. Working alongside CPRE, JTI also funded a pilot scheme to install bins in Middlewich, Cheshire.
- Between 2015 and 2019, JTI funded a TerraCycle cigarette waste recycling programme. Over 6 million pieces of smoking-related litter were recycled during this period. Also working with TerraCycle, JTI launched a cigarette waste recycling trial in Birmingham. Waste bins were installed across the city encouraging adult smokers to dispose of their litter responsibly.

Last year JTI recognised the need for a fresh approach to tackling smoking-related litter. Many adult smokers do already responsibly dispose of their cigarette butts. We believe a targeted approach, aimed at educating those adult smokers who do litter, is the best way to drive awareness and alter this behaviour rather than assuming that all adult smokers throw their cigarette butts on the floor.

JTI UK

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jti.com/uk

We invited several organisations to propose ideas for new ways of reminding adult smokers how best to dispose of their litter. We awarded funding for two new innovative campaigns - #IGiveAButt and a behaviour change project in partnership with Keep Wales Tidy.

JTI's expenditure on smoking-related litter campaigns in 2020 is in excess of £150,000. Over the past five years, JTI has spent over £500,000 on anti-littering initiatives in the UK.

Through #IGiveAButt, we are tackling the misconception of what to do with a cigarette butt. Our campaign is reminding adult smokers to throw their cigarette butts in the nearest bin rather than on the floor. This campaign launched on 24 September, with several highlights:

- We placed out of home advertisements at high-footfall locations across London asking adult smokers to *"dispose of your cigarette butt in the nearest bin"*.
- Working with a leading design agency, we re-invented the pocket ashtray. The #IGiveAButt Stub Tidy is based on actual consumer insight where adult smokers told us why they don't use the currently available pocket ashtrays. Our #IGiveAButt Stub Tidy is compact – fitting seamlessly into everyday life; sustainable – made with reusable materials and fully recyclable; and convenient – helping adult smokers get their butts from A to B when there is no bin in sight.
- In conjunction with the Daily Mail and the Metro, we have placed targeted adverts across the two websites where existing adult smokers are able to request a free #IGiveAButt Stub Tidy.

In developing the #IGiveAButt campaign, JTI surveyed 1,000 adult smokers to get their views on smoking-related litter. Of those who do not use a pocket ashtray, 83% said they would if it fit more seamlessly into their everyday life. The #IGiveAButt Stub Tidy is aimed at this group of adult smokers.

JTI is also funding a campaign with Keep Wales Tidy which tests the impact of positive messaging on littering levels in three Welsh towns. Working with behaviour change experts, Keep Wales Tidy will be testing whether positive messaging leads to greater engagement and a reduction in smoking-related litter.

The campaign had been due to launch last month but as a result of local lockdown restrictions across South Wales, this campaign has been delayed. We hope to be able to begin the project later this year.

JTI has engaged with a number of experts in the development of our anti-littering campaigns. However, in response to your specific question about JTI engagement with representatives from Keep Britain Tidy (KBT), we have had several meetings with the organisation over the past 12 months.

- Last year JTI invited KBT to propose an idea for a new anti-littering campaign that would deliver real impact. KBT ultimately decided not to participate in the process.
- In October 2019, we were contacted by KBT to discuss a proposal for a new anti-littering campaign that had been developed by the organisation. We met with KBT in December 2019 and discussed the potential to work together on JTI's #IGiveAButt campaign.
- Several discussions were held in subsequent months between representatives from JTI and KBT, with a further face-to-face meeting held in February 2020. However, it was decided that JTI's #IGiveAButt campaign had already been too developed for KBT to integrate their ideas. We agreed to share the findings of our campaign post-launch.
- In June 2020, JTI received correspondence from KBT proposing the creation of a "voluntary" Smoking-Related Litter Task Group. We have been in communication with KBT directly and discussions are being held at an industry level, led by our trade association - the Tobacco Manufacturers Association (TMA).

Finally, in your letter you note that *"cigarette and smoking-related litter remains a serious problem for communities"*. Whilst I agree that there is a need to continue to raise awareness amongst adult smokers of how to dispose of their cigarette butts responsibly, various studies rank litter in different ways. KBT's own Litter Composition Analysis in March 2020 for example found that cigarette butts were the most littered item by number, but this is due to their size. When looking at the volume of litter overall, the same analysis found that cigarette butts accounted for just 0.2% of all litter in the UK.

I hope you find the above information useful.

Yours sincerely,



Charlie Cunningham-Reid

Corporate Affairs & Communications Vice President, UK

Appendix

#IGiveAButt Campaign

#IGiveAButt Stub Tidy



Daily Mail advertorial – published 24 September 2020

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#IGiveAButt Dispose of your cigarette butt in the nearest bin

Stylish, portable and eco-friendly! Could THIS clever new gadget see the end of cigarette butts littering the streets?

Ad Feature by JTI

By MAILONLINE REPORTER
PUBLISHED: 09:10, 24 September 2020 | UPDATED: 21:12, 24 September 2020

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Examples of out of home advertisements in London



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London, W4 5YG

www.bat.com

Clive Betts MP
Chair, Housing, Communities and Local
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House of Commons
London SW1A 0AA

29 September 2020

Dear Mr Betts,

Thank you for your letter dated 8 September. We agree that there is more to be done to tackle the issue of cigarette butt litter. We believe that all parties involved in this issue, including consumers, manufacturers, retailers and local authorities, have a role to play.

We also believe that our collective response should be driven by a full and transparent understanding of the data relating to butt litter, particularly in terms of how the size and scale of the issue is measured. It is critical that proper consideration is given to the weight of butt litter material found in public places and not just the number of butts found by item count. This will ensure the response for dealing with it is not only aligned with commonly used and widely accepted waste management approaches in the UK which are generally weight-based, but also ensure the response is proportionate, effective and commensurate with the scale and nature of the issue. As an example, according to Keep Britain Tidy's (KBT) Litter Composition Analysis¹, carried out on behalf of DEFRA in March of this year, whilst cigarette butts account for 66% of littered items by count, they only make up 0.2% of overall litter volume.

It is also important to recognise that we have encountered challenges historically when trying to engage with local authorities and KBT. Until relatively recently, KBT would not work with us, and many local authorities continue to refuse to engage with us, citing Article 5.3 of the World Health Organisation's Framework Convention on Tobacco Control and the Local Government Declaration on Tobacco Control. As we have highlighted to the committee previously, we have sought legal advice which has found that neither Article 5.3 nor the Local Government Declaration should restrict such engagement on the issue of cigarette butt litter given that it is an environmental issue, rather than a public health issue.

Nevertheless, we are pleased that KBT has recently changed its position and is willing to engage with us now. We recently attended a roundtable hosted by Rebecca Pow MP, Parliamentary Under-Secretary of State at DEFRA, where we discussed industry-wide approaches to tackling cigarette butt litter, and we are continuing discussions with KBT and others on this matter.

In the meantime, the Tobacco Manufacturers' Association (TMA) is launching a butt litter awareness campaign across six major cities this October and has commissioned new research to better understand the waste and recycling landscape related to cigarette butt litter.

In addition to work undertaken by the TMA, BAT's R&D centre in Southampton has over many years been examining the science surrounding cigarette filters. We have commissioned more than 20 different projects exploring the development of alternatives to cellulose acetate filters, with just over £15 million being invested in these projects in the past seven years, and since 2009 we have filed

¹ Keep Britain Tidy, *Litter Composition Analysis*, March 2020

19 patents related to this issue. While it may sound simple to just change the design and composition of a filter, it is crucial to ensure that any alternative filtration material enables regulated emissions standards to be met and does not compromise the levels of emissions to which consumers are exposed. We are also calling for the creation of internationally recognised standards to assess the biodegradability of cigarette and tobacco waste, and we continue to explore the impact that variables such as the physical environment can have on the biodegradability of cigarette filters.

BAT is also using advanced technology to better understand the problem of littering. Working with a third party, we recently produced a world-first baseline survey of littered cigarette butts, focusing on two major sites in London. Using automated machine learning and satellite imagery, we were able to obtain critical data on mismanaged litter patterns. The hope is that such technology can help to direct efforts to address litter, whether through consumer awareness campaigns, waste management strategies, direct cleaning or product innovation.

Whilst our share of the market in tobacco products is among the lowest in the UK at just over 8%, we are the UK's leading provider of vaping products (with our flagship brand, Vype) and we have just brought to market Velo, our non-tobacco oral nicotine product. Combined, we believe these products can play a critical role in offering smokers a viable alternative to combustible tobacco, reducing tobacco-related harm and helping to meet the government's smoke-free 2030 target.

Environmental sustainability is integral to how we manufacture, distribute and sell these reduced risk products. As an example, we recently launched a new initiative designed to incentivise responsible disposal of used vapour cartridges. Our "Drop the Pod" scheme, which is being trialled in 20 of our Vype stores across the UK, encourages consumers to return used cartridges in exchange for free replacement packs. We are also taking urgent steps to reduce the amount of plastic we use – our aim is for our Vype packaging to be 100% free of silicon caps and poly wrap by the end of this year, as we move closer towards 100% recyclable, reusable or compostable content in all our packaging.

Finally, I wanted to highlight our commitment to sustainability more broadly. As a company we have a number of new and ambitious global targets designed to reduce our environmental impact. Key among these is our commitment to becoming carbon neutral by 2030, and by 2025 to:

- reduce waste sent to landfill by 40%;
- increase the amount of water recycled to 15%;
- eliminate unnecessary single-use plastic packaging;
- ensure 100% of plastic packaging is reusable, recyclable or compostable; and
- ensure we have 30% average recycled content across all plastic packaging

Together with the information provided by the TMA, I hope this information is useful for your committee.

Yours sincerely,



Nathan Jones
Head of Government and Corporate Affairs, UK & Ireland, BAT