October 7, 2019

To the attention of:

The Office of the High Commissioner for Human Rights,

United Nations Office at Geneva, CH 1211

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I am writing on behalf of Action on Smoking. Founded in 1967, [Action on Smoking and Health](http://www.ash.org) (ASH), an organization with ECOSOC Status, is the United States’ oldest organization devoted to fight the harms caused by tobacco, both in the US and globally, and dedicated to a world with zero tobacco deaths. We appreciate the opportunity to provide input into the report on realizing children’s rights through a health environment.

Tobacco use is still the leading cause of preventable death globally, taking over seven million lives a year, and likely to kill a billion people this century. Despite widespread knowledge of the health consequences of tobacco use, the environmental impacts of tobacco manufacturing, distribution, consumption, and disposal have received little attention. It is clear that no matter how much more efficient the tobacco industry becomes or how much more it is regulated, it will never be environmentally benign. Environmental concerns about tobacco also intersect with other pressing global issues, such as those addressed by the *Sustainable Development Goals*,[[1]](#endnote-1) the *Rio + 20* environmental commitments,[[2]](#endnote-2) climate change science,[[3]](#endnote-3) and environmental justice[[4]](#endnote-4), as well as clearly having a negative impact on children’s rights due to pollution, toxic chemicals, and other environmental detriments. Tobacco negatively impacts many rights that effect children, but the impacts on the right to health are the most concerning. Taking an environmental rights based view of tobacco makes it even clearer that we cannot allow the horrible legacy of death and disease from tobacco continue to be a burden on children and future generations.

*Litter*

More than 6 trillion manufactured cigarettes are sold globally every year. Because of this level of product consumption, discarded cigarette butts have been the number one item picked up globally on beach and environmental cleanups every year for more than 30 years. Cigarette butts contain a wide array of highly toxic and carcinogenic chemicals, pesticides, heavy metals, and nicotine. These chemicals leach out of discarded butts into the environment, and therefore butts are toxic hazardous, waste products. Despite environmental concerns and anti-litter laws, this toxic waste is largely unregulated.[[5]](#endnote-5),[[6]](#endnote-6)

*Plastic filters*

97% of all cigarettes sold in the United States are filtered, and almost all filters are made of non-biodegradable plastic (cellulose acetate). This material decomposes in the environment only after many years under ideal conditions. Many smokers believe filters provide some health benefit – that they are safer – but official US Government reports confirm there have been no benefits to public health since their introduction more than fifty years ago. The tobacco industry knows they are a fraudulent marketing tool, but the public and policymakers need more information in order to dispel the notion that filters make cigarettes safer. Actions at national, state, or local levels may be taken to ban the sale of filtered cigarettes as an environmental pollution intervention, to reduce cigarette consumption, and to further de-normalize tobacco use overall.

*Carbon impacts*

There is an urgent need to estimate carbon produced through the lifecycle of tobacco production and use, including growing, manufacturing, distribution, and consumption. Under Article 18 of the Framework Convention on Tobacco Control (FCTC), Parties agree to have due regard to protect the environment with respect to cultivation, curing, manufacture, distribution, consumption, and post-consumption waste.[[7]](#endnote-7)

*Second and third-hand smoke*

Where smoke-free policies are not implemented or poorly implemented, second hand smoke (SHS) is a leading cause of indoor pollution and illness. Recent studies suggest that third hand smoke (THS, the residual chemicals left on indoor surfaces where smoking has occurred) can persist for years, long after cigarettes are smoked in closed environments. Additional action is needed to achieve comprehensive protection of non-smokers from SHS and further research is needed to determine the potential harms of THS and policies that may address these concerns.

*Industry responsibility*

Tobacco product waste cleanup is very costly. In 2010, a San Francisco city audit of this waste led to adoption of a US$0.20 per pack fee for cleanup, administration, and related tobacco control initiatives, with a total cost of US$7 million annually. While the fee was recently raised to US$0.75 per pack, it is clear that taxpayers, local authorities, and voluntary groups still bear the external costs of tobacco product waste. These costs should shift to groups that benefit from or use of tobacco products (i.e., tobacco industry, distributors, and smokers). This shift in responsibility is consistent with the environmental protection principles of Extended Producer Responsibility (EPR) and Product Stewardship (PS).[[8]](#endnote-8)

*Moving forward*

The galvanizing view that there is an ‘end game’ for tobacco control suggests that additional new intervention channels are necessary to achieve this goal--including a focus on tobacco’s adverse impact on the environment.[[9]](#endnote-9) Despite significant global progress against tobacco use with behavioral, economic, and regulatory interventions, the burdens of tobacco-attributable mortality, morbidity, and economic costs are still unacceptable, particularly with respect to their burden on children and future generations. Success will require new, bold approaches that include a diverse mix of ideas, partnerships, and disciplines. New communications initiatives, policy research, and advocacy regarding tobacco’s impacts on the environment will help further de-normalize tobacco use and shift responsibility for these impacts onto the tobacco industry and away from communities. Reducing or eliminating tobacco use is a win for public health, a win for children’s rights, and a win for the environment.

We are grateful to you for the opportunity to contribute to the report, and we are confident that you will give tobacco and its negative impacts on the rights of children, particularly the right to health, the attention it deserves.

Sincerely,



Laurent Huber

Executive Director

Action on Smoking and Health

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7. World Health Organization. *Tobacco and its environmental impact: an overview*, 2017. Retrieved from: http://www.who.int/tobacco/publications/environmental-impact-overview/en/ [↑](#endnote-ref-7)
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9. Novotny TE (2015) The Tobacco Endgame: Is It Possible? *PLoS Med* 2015;12(5): e1001832. doi:10.1371/journal.pmed.1001832 [↑](#endnote-ref-9)