

A Provincial Deposit – Return Program for Cigarettes

A well structured program can protect the environment and overcome the deficiencies of public ashtray programs.

Cigarette butts are the leading source of litter, both by number and weight, both in Canada and worldwide, where billions are littered daily. They are unsightly, non-biodegradable and toxic to the environment. They are increasingly getting the attention that they deserve as an environmental concern.

Awareness and enforcement campaigns are ineffective and/or impractical, therefore recently public ashtray-equivalent-based programs have been proposed. This tactic is supported by the tobacco industry and clean-up groups, who often do not see any problem in partnering with them.

A pilot program of such is currently underway in Vancouver, yet is not succeeding (estimated 3% to 6% efficacy) with multiple butts seen not only meters away from the “receptacles”, but even directly below them. A properly designed deposit-return program will likely be much more effective as it relies only on personal financial self-interest, and not any plea to “do the right thing”.

Ashtray programs are bad for public health.

1 By nature, these programs counter a principal public health tenet - the denormalization of tobacco use. Government programs should aim to lessen the visibility and acceptability of the tobacco industry and smoking. The widespread presence of ashtrays (Vancouver's ultimate plan was for 2000 of them) imply tacit government consent, acceptance and even approval of widespread smoking in public. They strengthen the impression that smoking is common, and create smoking zones in public places. Such re-normalization of smoking is directly aligned with the strongest interests of the tobacco industry.

2 Many of these ashtrays are placed within no-smoking buffer zones around doorways etc.. This ridicules and encourages violations of, hard-fought for, City Health Bylaws.

3 These programs often involve partnering with the tobacco industry (as initially was the case in Vancouver, albeit indirectly). This is inappropriate and runs counter to government obligations under Canada's participation in the WHO Framework Convention on Tobacco Control .

Deposit-Return Programs can support public health objectives.

1 Tobacco litter serves as free, albeit perverse, advertising for the tobacco industry, possibly just the sort that appeals to rebellious teenagers, the highest risk group for starting.

2 Tobacco litter serves as withdrawal triggers/reminders to all smokers, and especially those trying to quit.

3 Tobacco litter in places where smoking is prohibited (eg: building entrances, park benches) is used as an excuse by the next potential smoker to break the bylaw as well, knowing that so many others have previously ignored it.

4 Although (in this proposal) fully refundable, the increased up-front cost of purchasing a pack, as well of the inconvenience of needing to return it to a depot, will likely dissuade some smokers/potential smokers from the purchase.

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DESIGN PRINCIPLES:

Deposit: this must be large enough to dissuade most smokers from actually littering. We would suggest \$1 per package or \$0.05 per cigarette butt.

Fully Refundable: on return of the pack with all 20 used (or preferably unused!) filters. It is important to be able to state that this is not an additional tobacco tax in order to help foster public consent for the program.

Return: this should be done at central depots. This will decrease the visibility of smoking and of tobacco litter, thereby furthering the public health mandate of denormalizing the tobacco industry.

(In British Columbia, Encorp Pacific, <http://www.return-it.ca> is a federally incorporated, not-for-profit, product stewardship corporation with beverage container management as their core business, who are also charged with collecting multiple other products. They have 172 locations across the province and would seem an obvious fit. It is likely that individuals will spontaneously design business arrangements whereby they collect and return multiple packs from other smokers for a small percentage of the return; we see no reason to discourage such.)

Recycleability: it should be recognized that being able to recycle the butts is an added bonus, and not necessary to the usefulness of the program. Even if all the butts were to end up being placed en-masse in a landfill, this would be infinitely better than billions entering sensitive areas of the environment individually.

(Currently, to our knowledge, TerraCycle is the only company recycling cigarette butts, and they do so in open partnership with the tobacco industry. We recommend that the government either develop their own recycling facility, or consider partnering only with private companies willing to forgo all ties with the tobacco industry. Whether TerraCycle would have the capacity to handle the considerably increased volumes that would be generated via a deposit-return program is unknown.)

Portable ashtrays: these cost very little, and their use can be encouraged as a means to extinguish and transport the butts before placing them in the packs. In reality a few seconds care in extinguishing the butt and a plastic baggie is all that is required. Alternately the packs could easily be redesigned with a foil pocket in order to serve as their own portable ashtrays from the beginning.

Marking of packs eligible for return: cigarette packs are already marked by provincial origin and multiple options are available to enhance such including stamps, bar codes, and other electronic means. This will lead to the packs themselves as the functional holders of most of the deposit value, and therefore any littered packs will become quite valuable, as they could be filled up with any 20 littered butts for a full refund (such is not a problem as ultimately the same end will result).

Return of "orphaned" littered butts: these should also be considered for refund, however at a much lower rate, We suggest 1¢/butt. This should be done in bulk by dry weight.

A pilot project run by WestEnd Cleanup June 18, 2013 proved that this will work, and gathered widespread media attention and approval (as proof of principle for a deposit-return program and a call for such), collecting 60 000 butts in several hours by paying \$20/ pound of butts, calculated to be 1¢ each.

Including this component will virtually guarantee that almost all cigarette litter will rapidly disappear one way or the other. This also provides a small source of income for many disadvantaged individuals, although such should not be viewed as the principal goal of the program (having the butts not be littered in the first place is). The lower rate of return is necessary in order to prevent a degree of inevitable cheating from bankrupting the system, as we see no way to prevent such cheating (both attempts to mix in non-cigarette litter, and the return of non-eligible butts from other sources).

There should also be a maximum weekly return of these, such as 7lbs/wk/individual, and names/addresses should be recorded in order to discourage organized cheating. We would also suggest that the roll-out of this aspect of the program occur only following a 3-6 month delay for two reasons: Firstly, so that the percentage of marked packs being returned can be assessed; if it is very high (~95%?) then there would be less need for this component, and also both a tendency for a greater percentage of cheating, and less available funds to cover such. Secondly there should be time for an attempt to clean up butts pre-existing from before the deposit program was initiated as, of course, all such butts will not have been covered by any deposit.

Funding: with the above details the program would be ahead 4¢/ littered butt, this should be enough to both cover cheating (even if an unimaginable 50% by weight, the program would still be ahead 3¢/ littered butt), and administration costs. Therefore, after start-up, the program should be self-funding. There also will be some income from the temporary holding of funds. Should the above calculations fail, the program could be modified to claw back a small percentage of the deposit. Current efforts to clean up tobacco litter are quite expensive-estimated at over \$7 million/yr by the City of San Francisco.

Anticipated Volumes: according to [Propel's Tobacco Use in Canada](#)¹ British Columbia has 515,000 smokers, who smoke an average of 12.9 cigarettes per day, suggesting a daily consumption in this province of 6.6 million cigarettes or 330,000 packages.

The following calculations obviously make multiple assumptions, but should serve as a useful guide:

- If all eligible and returned in full packs, the above would translate to \$330,000 in deposit funds collected daily, or \$120 million in a year.
- If there were 172 depots, each would be expected to handle on average 1,900 packages per day, providing \$1,900 in refunds.
- Most customers could be assumed to batch packs and return them on an infrequent (say monthly) basis, resulting in about 65 transactions per depot per day.

The tobacco industry should not be involved: other recycling programs do involve the source industry, via the notion of Extended Producer Responsibility.

However as a pariah industry which has repeatedly shown that its intentions are not in-line with the good of society, and the sole to be affixed the relationship status of "denormalization" by the government, the tobacco industry should be allowed no role in this program. Deposit funds awaiting return should be held either by the government, the collecting corporation, or one of their proxies.

The industry's views on this program are not known at this time. Given that it would lessen the visibility of their product, their opposition could be anticipated.

Pilot projects are not advisable: The feasibility of a deposit-return model has already been demonstrated by the success of B.C.'s beverage container recovery system. Additionally any smaller pilot jurisdiction would face challenges that would be less daunting province-wide, including the incentive for smokers to just buy their packs outside the region and the marking of packs eligible for deposit-return.

However if a pilot project is viewed as politically expedient, we believe that if designed properly such could be successful. It would be most feasible in isolated communities such as islands (Haida Gwaii?) or up north (or if larger is desired an entire health region could be considered, such as Island Health or Northern Health) where the closest tobacco vendor outside the region would be quite far, and hopefully local leaders would sign on and help instil a sense of pride in the community at being pioneers in this fully refundable environmental/ health initiative. We advise against including any return for "orphaned" littered butts in such a pilot as there would be too great a potential for butts being brought in from elsewhere.

British Columbia's beverage container recovery system, enacted in 1970, is the oldest legislated deposit-return system in North America, and has been highly successful, and widely copied.

British Columbia can again take the environmental lead with a bold and innovative approach to fighting cigarette litter.

It must do so in a manner that is consistent with public health objectives.

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¹ Propel Centre for Population Health Impact. Tobacco Use in Canada. Patterns and Trends – 2014 edition.