



Physicians *for a* Smoke-Free Canada

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Please accept this e-mail as a submission to your review of the proposed Single-Use Plastics Prohibition Regulations which were published in the Canada Gazette, Part I, December 25, 2021.

Physicians for a Smoke-Free Canada is a registered health charity which has been in operation in Canada since the mid 1980s. Our primary mandate and focus is raising awareness of the harms caused by tobacco use.

As a public interest non-governmental organization, we offer our support of the proposed regulations, and recommend that they be strengthened and adopted. Our key recommendation for this regulation is the inclusion of plastic cigarette filters in the list of plastic products whose manufacture, import, and sale would be prohibited.

Cigarette filters should have been included in these regulations

Our reading of the development of this regulation is that cigarette filters were exempted from this regulation because they did not fit all the criteria used to identify priority SUP. In particular, they were not found to be problematic for wastewater treatment and an exemption consideration was the lack of availability of a substitute. (The table below is taken from ECC's 2020 discussion paper "A proposed integrated management approach to plastic products: discussion paper.")

Environment and Climate Change Canada's analysis of selected single-use plastic products

	Environmentally Problematic		Value recovery problematic			Exemption considerations	
	Prevalent in Environment	Known or suspected to cause environment	Hampers recycling or wastewater treatment	Non-recyclable, low or very low recycling	Barriers to increasing recycling rate	Performs essential function	No viable alternatives
Ban proposed							
Plastic checkout bags	✓	✓	✓	✓	✓		
Stir Sticks	✓	✓	✓	✓	✓		
Six-pack rings	✓	✓	✓	✓	✓		
Cutlery	✓	✓	✓	✓	✓	sometimes	
Straws	✓	✓	✓	✓	✓	sometimes	
Food packaging made from problematic plastics	✓	✓	✓	✓	✓		
Other methods							
Other bags (e.g. garbage)			✓	✓	✓		
Snack food wrappers	some		some	✓	✓	✓	
Multi-packaging			✓	✓	✓		
Disposable personal care items			✓	✓	✓		
Beverage bottles and caps	✓	✓					
Contact lenses and packaging	✓			✓	✓	✓	✓
Drink cups and lids	✓		✓	✓	✓		
Cigarette filters	✓	✓		✓	✓		✓

These conclusions were unfortunate.

1) Although this is not our area of expertise, we believe that there is no evidence to exonerate cigarette filters as an impediment to wastewater recycling, and that there are reasons to believe that they are a source of microplastics in wastewater which could “hamper” wastewater recycling.¹

2) The issue of “alternatives” is not relevant to the discussion. There is no **need** to replace cigarette filters with an alternative method of making cigarette smoking a more pleasant experience, or one which gives the impression that smoking is less harmful than it is. Cigarette filters are, by design and use a harmful product element. They serve no public purpose and cause harm to the environment and to human health. ²

It is not too late to include Cigarette filters in the proposed prohibition

There has been adequate public consultation on the regulation by the department, and these consultations have resulted in recommendations for cigarette filters to be included. The inclusion of cigarette filters, even at this late stage is fully justified.

- A parliamentary committee has recommended the inclusion of cigarette filters in a plastics ban.³
- There is public support for a ban, as cited in your RIAS.
("two-thirds of Canadians polled indicated support for extending the proposed prohibitions to cover more than just the six categories of SUPs identified by the Framework, such as cigarette filters, polystyrene and hot and cold drink cups.")
- Cigarette filters are well established as a major source of plastic waste, as cited in your RIAS.
("The top 10 items reported in the Ocean Conservancy International Coastal Cleanup 2020 report (in which Canada participated) were food wrappers, cigarette butts, plastic beverage bottles, plastic bottle caps, straws and stir sticks, plastic cups and plates, plastic grocery bags, plastic take-out containers, other plastic bags and plastic lids."
"Data based on total items collected over time from the European Environment Agency shows that the most common category of items found as marine litter on the beach are cigarette butts, plastic caps and drink lids, shopping bags, string and cord food wrappers, cotton bud sticks, drink bottles and food containers."
"Domestically, a separate clean-up effort in 2019, the Great Canadian Shoreline Cleanup, also found cigarette butts, food wrappers, bottle caps, plastic bags, plastic bottles and straws in their top 10 most commonly found litter items.")

The alternatives to a ban (biodegradable filters, EPR etc.) expose public health to significant and unnecessary risk.

The policy decision to postpone the implementation of a ban on cigarette filters is a concession to a tobacco industry which has already caused enormous damage to Canada. This industry will seek to delay a ban on plastic filters by proposing the use of alternative (biodegradable) filter materials and by ‘volunteering’ to coordinate mitigation measures. These options are profoundly flawed and should be rejected by the two federal departments responsible for administering the Canadian Environmental Protection Act:

- Biodegradable filters will continue to facilitate the uptake of smoking by making the product more attractive and by making the experience of smoking appear less dangerous than it is.
- Biodegradable filters will not address the toxins that are released into the environment through discarded butts.
- The tobacco industry management of the waste issue (EPR) will allow the companies to greenwash their reputation and will facilitate their ability to influence government and to use their economic power to otherwise influence regulatory and social attitudes in ways that perpetuate the use of their deadly products.

We urge you to address the weaknesses in this regulation as quickly as you are able. We believe the government has the authority and responsibility to include cigarette filteres in this regulation without delaying the implementation of the regulation for other plastics. By whatever means chosen, such a measure should be implemented as soon as possible.



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Notes

- ¹ E Fältström, KB Olesen, S Anderberg. Microplastic Types in the Wastewater System—A Comparison of Material Flow-Based Source Estimates and the Measurement-Based Load to a Wastewater Treatment. Sustainability, 2021
- ² Evans-Reeves K, Lauber K, Hiscock R The ‘filter fraud’ persists: the tobacco industry is still using filters to suggest lower health risks while destroying the environment Tobacco Control Published Online First: 26 April 2021. doi: 10.1136/tobaccocontrol-2020-056245
- ³ House of Commons Standing Committee on the Environment and Sustainable Development. Committee Report No. 21 - ENVI (42-1) - The last straw. Turning the tide on plastic pollution in Canada. 2019.