

Guide for cigarette filter input in the single-use plastics public consultation

How to access the consultation

Go to the following website: [Rules on single-use plastics and fishing gear \(evaluation\)](#).

Scroll down to the 'respond to the questionnaire' button and click on it.

You will be taken to the EU Login screen. Create an EU Login account and log in.

You will see the following page:

Save a backup on your local computer (disable if you are using a public/shared computer)

Evaluation of the Single-Use Plastics Directive (EU) 2019/904

Fields marked with * are mandatory. 

Introduction

The European Commission is carrying out an evaluation of [Directive \(EU\) 2019/904](#) on the reduction of the impact of certain plastic products on the environment (the Single-Use Plastics Directive SUPD – it also covers fishery items).

The Directive aims to:

- prevent and reduce the impact of certain plastic products on the (marine) environment and on human health;
- promote the transition to a circular economy by encouraging innovative and sustainable business models, products and materials;
- improve the functioning of the internal market by setting common rules across the EU.

At the top of this page, you can select any language of your choice.

However, note that this guide provides example answers in English.

Now start filling in the questionnaire!

See the following pages for example answers you can use. These are indicated **in blue**. You can draw on these answers but describe them in your own words. This is important because the European Commission invalidates duplicate answers.

Please note!

- March 17 (midnight Brussels time) is the last day to respond.
- Filling in the questionnaire takes about 15-20 minutes. You can also save this as a draft in between (at the top right of the page you will find the button 'save as draft') and return to it later.
- This guide only shows answers to the questions relevant to cigarette filter input. Feel free to skip the rest of the questions.

Thank you for your involvement!

About you

Enter your details and indicate in the privacy settings for disclosure whether your input will be anonymous or public on the European Commission's website.

Section B. General questions (awareness, behaviour & perceived results)

Awareness & perceptions

The SUPD aims to reduce the environmental impact of plastic waste by introducing different measures for different types of single-use plastic products (SUP) and for fishing gear containing plastic. These include banning or restricting the most common single-use plastic items, promoting alternatives, and requiring producers to take greater responsibility for waste management.

Question 1) Before this survey, were you aware of the EU rules on single-use plastics and fishing gear containing plastic?

Answer

Yes

Question 2) Since 2019, have you noticed changes in the availability of SUP products, e.g. straws, cutlery, cups, food containers, tobacco filters, beverage stirrers?

Answer

Not sure

Question 3) How do you perceive the level of single-use plastic litter in your area compared to the level of single-use plastic litter in 2019?

Answer

No change

Explanation: we recommend entering 'no change' here. This is because many smaller and large (global) cleanup and monitoring efforts continue to show that the problem of cigarette filter pollution does not - or hardly - seems to decrease despite the current measures in the SUPD. Cigarette filters are notoriously hard to clean for municipal waste services and other organizations responsible for our streets, parks, beaches and waters.

Question 4) Which of the items covered by the SUPD do you still most often encounter as litter? (choose up to 3).

Between 1 and 3 selections

| |
|---|
| <p>Answer</p> <p>Tobacco filters</p> |
| <p>Explanation: Cigarette filters are one of the most littered plastic items in the world, as a direct contribution from the trillions of filtered cigarette butts discarded each year.</p> |

Question 6) Are there any unintended effects that you have observed, for example substitution by less sustainable alternatives (e.g. PFAS-coated papers), false green claims (e.g. false reusability/biodegradability claims), increased consumption of alternative items (e.g. paper-based takeaway boxes) etc.?

Answer:

Yes, there are unintended effects. There are products that are marketed as biodegradable plastic but do not degrade sufficiently (false claims). This form of greenwashing also occurs with so-called biodegradable cigarette filters, which distract attention from the fact that filters are a non-essential, harmful product in the first place. "Biodegradable" filters pose a similar threat to the environment as conventional cigarette butts on degradation and ecotoxicity. Biodegradable filters are still designed to function like plastic filters: single-use, mass-produced, and hard to collect. Their "biodegradability" often refers to ideal lab conditions, not real-world litter environments.

Effectiveness & behaviour

Question 8) Are you aware of the "turtle label" or awareness campaigns related to SUP items?

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|--|
| <p>Answer</p> <p>Yes</p> |
| <p>Explanation: we recommend answering "yes" here. This will lead to a follow-up question (see below).</p> |

If "Yes", has the turtle label introduced by the SUPD for products (i.e. sanitary towels/tampons/applicators, wet wipes (personal/domestic), tobacco filters, cups) or awareness campaigns influenced your behaviour?

| |
|---|
| <p>Answer</p> <p>No</p> |
| <p>Explanation: We recommend a 'no'. Few people know what this logo means. And we see no effect of these types of measures on the presence of tobacco filters in the environment. In a study conducted in 2021, CE Delft demonstrated that an information campaign by the Dutch</p> |

national government would have only a limited or no effect on litter. “The expectation that a campaign alone will lead to behavioral change is limited. However, a campaign could potentially lead to effective knowledge transfer.” (CE Delft, 2021) Previous research into the labeling on cigarette packs has also shown that the information signal has not yet had a demonstrable effect (European Commission, DG for Environment, 2021).

Question 12) What has worked best so far in reducing the negative impacts of single-use plastics and fishing gear containing plastics?

Answer:

Bans on single-use products have worked best so far. These must be introduced alongside additional, supporting measures, such as deposit-refund systems and an effective extended producer responsibility (EPR) system. Unfortunately, EPR systems, such as those for cigarette filters, do not reflect the actual costs of pollution. As a result, responsible industries pay too little for the damage they cause to the environment. EPR for cigarette filters should extend responsibility beyond public waste systems to include all discarded filters, should factor in the true costs of cleanup and infrastructure, and should recognize that cigarette filters cannot be integrated into a safe circular economy. Clean-up operations, awareness campaigns, and waste management are necessary but remain structurally insufficient to prevent the continuous flow of cigarette pollution at source. For these reasons, an effective and proportionate response must prioritize upstream prevention. The directive should allow for the prohibition of cigarette filters, regardless of their material composition.

Section C. In-depth questions related to SUP products (relevance, scope, market effects & implementation)

Relevance

The Directive is considered relevant if it responds to environmental concerns, public health issues, and citizens’ expectations.

Question 13) Please complete the following statement: “Tackling single-use plastic products in the EU is...”:

Answer

Very important

Explanation: we recommend selecting “very important” here. It is crucial that the Single-Use Plastics Directive remains in place and is even strengthened with new measures.

Question 14) The SUPD introduces different types of measures: consumption reduction, restrictions on placing on the market, tethered caps for beverage containers, recycled content, marking, extended producer responsibility (EPR), separate collection, and awareness raising. How appropriate are these types, including regarding their level of ambition?

Answer

Not appropriate

Please explain which measures are not appropriate.

Answer:

Several measures are not ambitious enough. Cigarette filters generate billions of small, toxic pieces of waste that are difficult to collect and often escape existing waste systems. Their impact on the environment cannot be addressed solely with end-of-pipe measures. Even when cigarette filters are collected, they cannot be safely recycled or composted because they are contaminated with high concentrations of toxic substances (nicotine, PAHs, metals). This makes them fundamentally incompatible with the objectives of the circular economy. Restrictions on placing plastic cigarette filters on the market should not lead to “false solutions.” Cigarette filters made from so-called biodegradable materials fall outside some legal definitions of plastic, but they are not environmentally friendly and should not be exempt from regulation. From a sustainability perspective, the problem is the filter itself, not the material it is made of. Biodegradable filters are designed to function like plastic filters: single-use, mass-produced, and difficult to collect. The EPR scheme for tobacco products should ensure the complete exclusion of the tobacco industry to prevent greenwashing and should include the real costs of clean-up and infrastructure. National monitoring data, providing the base for cost calculation in the EPR, is always an underestimation of the actual amount of littered cigarette butts.

Question 15) The Directive currently covers the following SUP products: cotton bud sticks, cutlery, plates, straws, beverage stirrers, balloons, balloon sticks, food containers, cups for beverages, beverage containers (including beverage bottles), tobacco filters, plastic bags, packets and wrappers, wet wipes, and sanitary items (see Part A–G of the Annex to the Directive). In your view, the current scope for the SUP products is:

Answer

Not sufficient

If "Not sufficient", please explain why.

Answer:

The Single-Use Plastics Directive should include a ban on cigarette filters. Cigarette filters are still the most common type of litter. Alternative measures adopted already under the current SUPD, such as extended producer responsibility (EPR), have not prevented the heavy environmental damage. Cigarette filters offer no health benefits, but cause persistent and large-scale environmental damage. Ban the sale of cigarettes with filters as inherently misleading products. The directive should allow for the prohibition of cigarette filters, regardless of their material composition.

Limiting measures to plastic-based filters would create loopholes in the law and encourage the switch to so-called “biodegradable” or “plastic-free” alternatives, which do not address toxicity, persistence, or real-world littering and often amount to greenwashing.

In addition, the introduction of new nicotine products creates additional single-use waste streams with similar consequences to cigarette filters. Disposable electronic cigarettes consist of plastic, electronic components, batteries, and hazardous residues and are often discarded or left behind outside the designated systems. While nicotine pouches easily escape collection and contribute to plastic and chemical pollution of soils, oceans, and rivers. The directive should therefore ban all single-use products from the tobacco industry.

Coherence

Coherence is assessed by judging how well the SUPD’s objectives, definitions, instruments and timelines align with the referenced frameworks, and whether implementation is consistent across countries and contexts. Consider overlaps, synergies, gaps or contradictions and briefly note concrete examples or where divergence occurs.

Question 18) Is the SUPD coherent with other EU policies (packaging, waste, Marine Strategy, tobacco control)?

Answer

No

If “No”, please provide examples of incoherence.

Answer:

The EU has set a target of reducing microplastics in the environment by 30% by 2030. Allowing cigarette filter pollution to continue, and with it the leakage of microplastics into the environment, is not in line with this ambition. Microplastic pollution from cigarette filters is an often overlooked but serious environmental problem. Each filter consists of 12,000 to 15,000 cellulose acetate fibers, and as these filters break down, microfibers are released into the environment. It is estimated that approximately 100 microplastic fibers are released from a single discarded filter per day.

In addition, the original objective of the Marine Strategy Framework Directive (MSFD) was to achieve “good environmental status” (GES) in all EU marine waters by 2020. This has not been achieved, including reaching the goal for the beach litter indicator. Tackling cigarette pollution would mean a significant improvement on this indicator and remains important for the future of the MSFD.

Question 19) Is the SUPD coherent with international efforts (Regional Seas conventions, Framework Convention on Tobacco Control, etc.):

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|-----------|
| Answer |
| No |
| Answer |
| Not sure |

If “No”, please provide examples of incoherence.

Answer:

Article 18 of the WHO Framework Convention on Tobacco Control relates to the protection of the environment in connection with tobacco control. During COP11, Decision FCTC/COP11(10) on the implementation of Article 18 of the WHO Framework Convention, confirmed the obligation of the parties to pay sufficient attention to environmental protection and human health in relation to the cultivation and production of tobacco. The decision establishes an explicit link between Article 18 and the environmental damage caused by tobacco waste, in particular the plastics used in product packaging and plastic cigarette filters. These are characterized as unnecessary, avoidable, problematic disposable plastics and are among the most common waste products in the world. The fact that the Single-Use Plastics Directive does nothing to address cigarette pollution is therefore inconsistent with this policy.

Another inconsistency with the Framework Convention on Tobacco Control lies in the tobacco industry's interference in the implementation of producer responsibility. Article 5.3 states that the involvement of the tobacco industry in influencing policy, awareness campaigns, or governance structures should be limited or excluded.

The SUPD should also take into account the action plans of regional marine conventions, such as OSPAR. And targets set out in OSPAR’s Regional Action Plan, such as

- reducing common plastic disposable items and marine plastic objects on beaches by 50% in 2025 and by 75% in 2030, compared to the reference year 2016; and**
- achieving a 70% reduction in all litter on beaches by 2030.**

Scope & definitions

The evaluation of the SUPD is looking at whether the current definitions used in the Directive are clear and workable. In particular, the definitions of ‘plastic’[1], and ‘single-use plastic product’[2] may affect how the rules are applied in practice across different sectors and countries.

[1] A material consisting of a polymer as defined in point 5 of Article 3 of Regulation (EC) No 1907/2006, to which additives or other substances may have been added, and which can

function as a main structural component of final products, with the exception of natural polymers that have not been chemically modified.

[2] A product that is made wholly or partly from plastic and that is not conceived, designed or placed on the market to accomplish, within its life span, multiple trips or rotations by being returned to a producer for refill or re-used for the same purpose for which it was conceived.

Question 20) Have the definitions of “plastic” and “single-use plastic product” created practical difficulties for you or your sector?

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|----------------------|
| Answer Yes |
|----------------------|

If “Yes”, please explain why.

Answer:

The rapid growth of new product categories, such as disposable electronic cigarettes and nicotine pouches, shows how environmental regulations can lag behind product innovations. While the directive focuses primarily on traditional tobacco-related plastics, new nicotine products risk falling partially or completely outside the material or product definitions. Leading to inconsistencies and loopholes in the regulations. We must strive to prevent this.

This guide does not provide sample answers for questions 21 to 40. These questions are primarily intended to gather input from people who own their own business or company, or who work for the government (implementation, enforcement etc.).

Click on the blue “Submit” button at the bottom of the page to send your answers to the European Commission!

Open feedback

40) Do you have any suggestions on how to simplify aspects of the SUPD that might appear overly complex without undermining its objectives?

Submit

**Thank you
very much!**