



## Protection of the Environment

This document relates to item 4.3 of the provisional COP agenda on the topic Protection of the environment and the health of persons (Article 18 of the WHO FCTC) and corresponds to document [FCTC/COP/11/7](#) and supplementary document [Regulatory options to prevent environmental harm and pollution across the tobacco product life cycle](#)

Eleventh session of the Conference of the Parties to the WHO Framework Convention on Tobacco Control,  
17-22 November 2025, Geneva, Switzerland

### Key recommendations

- GATC welcomes and supports the motivation and aims of ongoing efforts by Parties to advance work on tobacco product waste and protecting the environment from tobacco harm.
- GATC welcomes the Report by the Convention Secretariat to COP11 document FCTC/COP/11/7<sup>1</sup>, and the supplementary document Regulatory options to prevent environmental harm and pollution across the tobacco product life cycle <sup>2</sup>and encourages Parties to implement the regulatory options proposed in the reports to prevent and manage the waste generated by the tobacco industry and its products.
- GATC calls on the WHO FCTC Secretariat to continue to foster coordination and collaboration with entities in the United Nations (UN) system pursuing environmental mandates to raise awareness of the importance of the WHO FCTC in the fulfilment of environmental objectives and the UN Sustainable Development Goals.

### Key messages

- Tobacco growing, production, consumption and waste have a significant negative impact on the environment.
- The twelfth meeting of the WHO Study Group on Tobacco Product Regulation recommends *“banning filters to reduce the palatability and appeal of cigarettes, remove consumer misconceptions about filters substantially reducing health harms and reduce a major source of toxic tobacco waste, including the microplastics deposited by cellulose acetate in filters.”*
- WHO and the Secretariat of the WHO FCTC<sup>3</sup> support the banning or phasing out of cigarette filters, which provide no health benefit to consumers, but are a major source of toxic tobacco waste, including the microplastics deposited by cellulose acetate in filters. No substitutions should be encouraged for cigarette filters given their negative

<sup>1</sup> FCTC/COP/11/7, accessible at <https://storage.googleapis.com/who-fctc-cop11-source/Main%20documents/fctc-cop11-7-en.pdf>

<sup>2</sup> FCTC Secretariat (2025) Regulatory options to prevent environmental harm and pollution across the tobacco product life cycle <https://storage.googleapis.com/who-fctc-cop11-source/Supplementary%20documents/fctc-cop11-supp-inf-9-regulatory-options-to-prevent-environmental-harm-and-pollution-across-the-tobacco-product-life-cycle.pdf>

<sup>3</sup> World Health Organization (2025), Statement on behalf of WHO, including the Secretariat of the WHO Framework Convention on Tobacco Control (WHO FCTC), an entity hosted by WHO. Second part of the Fifth Session of the Intergovernmental Negotiating Committee to develop an international legally binding instrument on plastic pollution, including in the marine environment (INC5.2), accessible at [https://resolutions.unep.org/incres/uploads/who\\_statement\\_inc5.2\\_final\\_6.8.25.pdf](https://resolutions.unep.org/incres/uploads/who_statement_inc5.2_final_6.8.25.pdf)

impact on health, by increasing the palatability and appeal of cigarettes, and on the environment.

- Article 18 remains inadequately implemented in many countries while the tobacco industry uses environmental platforms and extended producer responsibility schemes to greenwash its image and influence policy in contradiction with Article 5.3 of the WHO FCTC.
- Parties should establish coordination mechanisms between health, environment, and other competent agencies to enable classification of tobacco product waste as hazardous waste.
- Implementation of Article 18 should align with Article 19 by holding the tobacco industry liable for environmental harm through polluter-pays and cost-recovery measures.
- In line with document FCTC/COP/11/7, a key “overall objective” to implementation of Article 18 of the WHO FCTC is to “reduce the consumption through “supply reduction” measures in addition to “demand reduction” measures.

### What to expect

The 10th Conference of the Parties adopted decision FCTC/COP10(14) on the implementation of Article 18 of the WHO FCTC, highlighting the significant environmental impact of tobacco production, consumption, and post-consumption. The decision requested the Secretariat to prepare a report for COP11 describing the various plastics used in tobacco production and packaging and how, as waste, they harm the environment; the extent to which protection of the environment from harm arising from tobacco product waste and packaging, such as plastics in tobacco products and their packaging, contributes to the implementation of Article 18 of the WHO FCTC; and the policy options that Parties may have to curb or prevent such harm. The two reports [FCTC/COP/11/7](#) and supplementary document [Regulatory options to prevent environmental harm and pollution across the tobacco product life cycle](#) concluded that “*WHO FCTC measures to reduce the demand and supply of tobacco products will contribute to reducing the environmental damage of the tobacco product cycle, along with implementing the upstream regulatory options*” and further stated that “*this could include measures that aim to reduce the availability of all commercial tobacco products through supply reduction approaches*”.

Building on this work, GATC urges Parties to consider ways to strengthen implementation of Article 18 and provide further guidance on how to address tobacco product waste and provide environmental protection from the impacts of tobacco harm. Discussions at COP11 are expected to emphasize the need for collaboration between health and environmental ministries around implementation of the WHO FCTC in alignment with Article 5.3. GATC would welcome a draft decision that seeks to clarify that tobacco control measures under the WHO FCTC include regulation of environmental harm caused by tobacco and nicotine products and related electronic devices.

In addition, GATC would support efforts by Parties to consider establishing an Expert Group to provide technical and policy guidance on these issues. These could include work on legal and institutional pathways, fiscal and liability measures, data-collection instruments and indicators, and methodological support to assess and mitigate the environmental impacts of tobacco production, trade, and waste.

## Why this is important

The environmental impact of tobacco production and consumption is significant. The WHO's report *Tobacco: Poisoning our planet*<sup>4</sup> raised awareness about the environmental harm caused by tobacco. The report highlighted that 600,000,000 trees are chopped down every year to make cigarettes, 84,000,000 tons of CO2 emissions are released into the air, raising global temperatures, 22 billion liters of water are used to make cigarettes and trillions of cigarette butts are discarded into the environment each year. Tobacco product waste releases nicotine, heavy metals, PAHs and cellulose-acetate microfibers that contaminate water, soil and food chains, causing direct toxic exposures and preventable health harms that increase pressures on public-health services<sup>5</sup>.

The WHO and the Secretariat of the WHO FCTC support the banning or phasing out of cigarette filters, which are a major source of tobacco waste, including plastic cellulose acetate microfibrils and other toxins. At the same time filters are actively harmful to health. They provide no protection to individuals, while the false reassurance and increased palatability they produce promotes and sustains smoking. Filter substitutions should also not be permitted, given the negative impact they would still have on the environment and on health.

For this reason, it is important that COP11 notes the report on policy options to address environmental impact of tobacco and adopt a decision to give further guidance to Parties and the FCTC Secretariat on how to best address tobacco product waste and how to better protect the environment from tobacco harm.

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<sup>4</sup> World Health Organization (2022), *Tobacco: poisoning our planet*, accessible at <https://www.who.int/publications/i/item/9789240051287>

<sup>5</sup> Beutel, M.W.; Harmon, T.C.; Novotny, T.E.; Mock, J.; Gilmore, M.E.; Hart, S.C.; Traina, S.; Duttagupta, S.; Brooks, A.; Jerde, C.L.; et al. A Review of Environmental Pollution from the Use and Disposal of Cigarettes and Electronic Cigarettes: Contaminants, Sources, and Impacts. *Sustainability* 2021, 13, 12994. <https://doi.org/10.3390/su132312994>