

## APPENDIX B2

# A Review of the Tobacco Industry's Response to Evidence of Environmental Impacts of Tobacco Product Waste

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## Introduction

In addition to concern for the adverse human health effects resulting from environmental exposures to second- and thirdhand smoke,<sup>1, 2</sup> there has been growing interest among environmental advocates, tobacco control researchers, and public officials on other environmental impacts of tobacco. Research during the late 1980s to the 1990s focused mostly on the adverse environmental impact of tobacco growing.<sup>3 4</sup> More recently, the impacts of tobacco product waste (TPW) have garnered attention.<sup>5</sup> Research based on publicly available archives of the tobacco industry documents revealed that the tobacco industry has expended significant effort to *appear* to address and remedy the environmental harms of tobacco growing.<sup>6, 7</sup> Similarly, the tobacco industry own surveys and other internal documents demonstrated that there was growing concerns with the fact that smoking generated litter,<sup>8, 9</sup> and that public campaigns to “show corporate responsibility” could be a strategy to deal with “irritation over [cigarette] butts” generating waste.<sup>10</sup> The tobacco industry’s motivation to address cigarette waste was to “prevent cigarette litter from impacting the social acceptability of smoking.”<sup>11</sup>

Recent research has pointed out the environmental harms of tobacco manufacturing along its entire supply chain.<sup>12-17</sup> Emerging research addresses waste from tobacco and nicotine products other than conventional cigarettes.<sup>18-20</sup> Several tobacco control advocacy groups and the California Department of Public Health have launched information and public education campaigns that focus on the environmental impact of TPW and the tobacco supply chain.<sup>21, 22</sup>

The tobacco industry has responded to scientific inquiry and advocacy focusing on the environmental harms of tobacco waste, with voluntary initiatives that initially only addressed downstream approaches to TPW, such as support for cleanup campaigns, increasing the number and distribution locations of handheld ashtrays, and educational efforts directed to smokers for them to properly discard their butts. The industry also has established partnerships with non-profit organizations to address TPW.<sup>23, 24</sup>

More recently, as revealed in various industry websites and sustainability reports, these efforts have expanded to include voluntary initiatives that claim to reduce the overall environmental impact of its businesses.<sup>25</sup> There is also evidence that the industry is attempting to market new tobacco products as pro-environment and therefore less harmful (e.g., nearly 64% of Natural American Spirit smokers inaccurately believe the cigarettes are less harmful than other brands).<sup>26</sup>

Given the tobacco industry's long-standing efforts to avoid responsibility for or admitting the truth about the health consequences of tobacco use, it is important to critically review how its evolving media and misinformation efforts are now aiming to avoid responsibility for the adverse environmental impacts of TPW, including from both traditional cigarettes and electronic nicotine delivery systems (ENDS, which includes electronic cigarettes heated tobacco products). This brief review will describe the evolution of the tobacco industry's response to concerns about the environmental impact of tobacco, including TPW, and its overall efforts to appear environmentally responsible, with a focus on California.

## Methods

We searched the Truth Tobacco Industry Documents library (<https://www.industrydocuments.ucsf.edu/tobacco/>) using the keywords “litter AND campaign AND California”. This search yielded 4,801 documents. We excluded documents where “litter” referred to animal experiments, reports by health authorities, duplicates, and news clippings of different local initiatives on TPW abatement. We selected 33 documents from the results to include in this analysis. A search using “carbon footprint” as the key word yielded 47 documents, mostly copies of corporate sustainability reports. We also included four documents that addressed companies’ response to public concerns about the adverse impacts of tobacco on the environment.

## Results

The search results demonstrate that the tobacco industry’s current efforts to address environmental harms are recycled from very similar efforts over the past four decades. These efforts intend to counter its overall lack of credibility with the public and to present itself as a responsible corporate citizen. What we learn from the documents is that the tobacco industry’s response to growing concerns over broader environmental harms, not only TPW, has consistently focused on anti-littering campaigns for TPW, rather than doing anything to actually prevent this pollution from occurring. In the past 15 years however, it has also highlighted its voluntary reductions of greenhouse gas emissions and manufacturing waste.

As early as 1979, the now defunct Tobacco Institute,<sup>27</sup> reviewed a proposal entitled “Litter,”<sup>28, 29</sup> which offered suggestions to “establish the concept of litter,” and the

need to exempt cigarettes from “pending litter control legislation” in several states. Their apparent concern was that a “litter tax approach” would involve tobacco products. The document concluded that the best approach for the Tobacco Institute was to “keep out of pending litter tax activity.” Instead, the recommendation was for the Institute to continue to focus on “courtesy” campaigns regarding smoking itself rather than framing littering as a discourtesy, and to consider supporting non-litter campaigns in states that were enacting litter tax laws (as an alternative to such laws). At the time, the Institute monitored all tobacco-related legislative proposals, including taxation for litter control, that were being considered by several states.<sup>30</sup> Such policy activities continued to be monitored by the industry in the following decades. Just as various jurisdictions recognized the value of taxation and the resultant tobacco product price increase as a critically important tobacco control strategy,<sup>31</sup> the tobacco industry recognized the danger in this strategy as a threat to its profitability. In 2010, the San Francisco City Council implemented a ‘litter fee’ of 20 cents per pack of cigarettes sold in the city in order to internalize the costs of TPW waste abatement to the price of cigarettes.<sup>32</sup> The industry response to this fee assessment was to work with other anti-tax forces (oil, alcohol, etc.) to launch and successfully pass a citizen initiative (Proposition 26) that now requires a two-thirds vote of the California population to allow such ‘fees’ as they are to be considered the same as taxes.<sup>33</sup>

In 1987, the tobacco industry successfully killed California’s Assembly Constitutional Amendment No. 14 (AC14), which was a precursor to California’s 1988 Proposition 99 (which added a 25 cent/pack tax to each pack of cigarettes sold).<sup>34</sup> AC14 intended to allocate funds from the new cigarette tax revenues to counties, cities,

the Department of Parks and Recreation, and the Department of Fish and Game (5%, 2.5% and 2.5% respectively). These funding streams were to be dedicated to, among other things, the prevention, control, and mitigation of tobacco-related litter.<sup>35</sup> However, this allocation language was not included in the final Proposition 99 revenue distribution.

In 1991, RJ Reynolds expanded its “Keep our Beaches Clean” program,<sup>36</sup> which included mobile billboards as well as distribution of table tent cards that businesses, including hotels and motels, could use to display campaign messaging, i.e. “keep our beaches clean” to their customers. California was one of the states that the program targeted. A prepared Question and Answer list on the program expansion included the following questions:

*6. So, you admit that your product causes environmental problems?*

*No. Cigarette butts are not harmful to the environment, but all litter, including cigarette butts, needs to be disposed of properly. The materials contained in a cigarette filter are degradable.*

*7. If they are degradable, then why do I see discarded cigarette butts everywhere?*

*We hope this public awareness campaign will encourage proper disposal of cigarettes.*

*8. How long does it take a cigarette butt to degrade?*

*Dependent upon the environment, on average. A cigarette filter could degrade in approximately six (6) months.<sup>36</sup>*

By 1991, however, the industry recognized that the cellulose acetate filters attached to almost all commercial cigarettes were not biodegradable and that the public interest regarding the environment was growing. A multi-company association known

as CORESTA (Cooperation Centre for Scientific Research Relative to Tobacco) established a task force to study biodegradability in 1992. The task force was disbanded in 2000 as it was “unlikely that the level of interest could justify the scale of the effort.”<sup>37</sup>

In 1995, RJ Reynolds announced the launch of another “litter awareness campaign” entitled “Smokers for a Clean America.”<sup>38</sup> The company would run advertisements in 25 cities, emphasizing the issue of cigarette litter. A news report of the initiative stated that the company believed “environmental responsibility is a subject both smokers and nonsmokers” could agree on. The program also planned to distribute “over five million portable ashtrays to adult smokers.”<sup>38</sup>

A 1998 report entitled “Cigarettes as Litter (California, Florida, Hawaii, Massachusetts, Minnesota, South Carolina)”<sup>39</sup> provides an overview of the six states that had attempted “to implement legislation to specifically designate [sic] cigarettes as litter.” Specific to California, the report lists a local legislation effort and several press clippings of TPW-related news. The report also lists California’s “key groups, programs and projects” and their activities, including cigarette butt clean ups. Groups listed were: Center for Marine Conservation, Los Angeles County Department of Public Works, California Coastal Commission, Surfrider Foundation USA, and I Love a Clean San Diego. It is unclear from the archives what plans, if any, were made as a follow-up from this report.

In 2000, a document entitled “Business Practice – Litter Reduction”<sup>40</sup> described this practice as bringing together smokers and nonsmokers to address the “growing concern” with cigarette waste and stated that “packaging material litter is not within

scope” of the initiative, waste generated from packaging materials notwithstanding. The focus was on filter as a source of waste. It highlights grassroots initiatives, including ones in California, as “gaining momentum in identifying and speaking out against cigarette butts as the #1 polluter found on beaches, streets and in our waterways.”<sup>40</sup>

The document discusses some of the litter campaigns and the potential for biodegradable filters. It highlights, as a “strength” (in its Strength Weaknesses Opportunities Threats (SWOT) analysis), that “most of the cigarette butt litter complaints today are directed toward the people who are littering and not the cigarette companies.”<sup>40</sup> [emphasis in original] It also highlights the “outcry” against tobacco waste as a threat that “may result in increased pressure on cigarette companies” and references the Novotny and Zhao 1999 *Tobacco Control* paper on environmental harm<sup>5</sup> as another threat. Another document from the year 2000 elaborates further on how Philip Morris USA (PMUSA) could address the issue of TPW.<sup>41</sup> It notes the growth in environmental activism, describes some product design changes under consideration, and highlights some of the campaigns PMUSA is developing or implementing, such as the distribution of portable ashtrays. Efforts in progress included “stakeholder dialogue” targeting groups, including the Center for Marine Conservation, for potential alliances (in addition to the well-known alliance with Keep America Beautiful<sup>24</sup>) and placing receptacles in visible public places. PMUSA also added a “don’t litter” message on cigarette packs and included disposable ashtrays in direct mail advertising.<sup>42</sup> The tobacco companies either mailed disposable or portable ashtrays directly to those on their mailing list, or offered sales promotions where proof of purchase could be exchanged for ashtrays.



In 2001, a memo to PMUSA from Steve Lombardo and Jason Booms, of Strategy One (a marketing research group), presents the results of a survey conducted in California to inform PMUSA's national advertising campaign.<sup>43</sup> The report summarizes Californians' "strongly negative and deeply held attitudes towards tobacco companies" and that the company's communications should focus on addiction, cessation, no safe cigarette, combined with "anti-youth smoking messages". The survey did assess the public's perception of the company's "litter reduction" efforts and reported that although these were "deemed 'credible'" they did not fare as well on "resolving the [tobacco] issue diagnostic." In the survey, 55% of respondents agreed that reducing litter was very important in resolving tobacco-related issues.

In 2005, PMUSA was planning a corporate responsibility communications program that allegedly was *not* a public relations (PR) campaign. However, the focus was still on cigarette waste (although in 1999, a PR plan for California included an "anti-litter/clean-up activities" component.)<sup>44</sup> Thus, it appears that while no longer called PR, the activity itself had not changed significantly. The campaign plan proposed classifying environment-related activities, which in the plan differed from philanthropy, under "ethical leadership".<sup>45</sup> Later in 2005, a PMUSA Performance Summary included an assessment of the company's initiatives to address "environmental impact." It described three initiatives: the company partnership with Keep America Beautiful, the distribution of portable ashtrays, and their work on a filter design. This summary also claimed that the company engaged with stakeholders to "learn more about society's expectations" including in the area of the environment.<sup>46</sup>

The PM USA 2007-2009 plan reframed its environmental messages from litter reduction to reduction of the “environmental footprint.”<sup>47</sup> It states:

*We will expand our efforts to reduce the environmental impact of our business. We have already taken significant steps to decrease the size of PM USA’s environmental footprint. These initiatives include partnering with Keep America Beautiful® to address cigarette butt litter, reducing greenhouse gases, increasing our overall recycling efforts and pursuing the use of landfill gas as an alternative fuel, which will be implemented at the Cabarrus Manufacturing Center in 2007.*<sup>47</sup>

The plan also included reducing litter through product research and technology. A related document indicates that the company established an Environmental Review Board, “comprised of 6 members of senior management”, to oversee the implementation of these activities, and reported a reduction in greenhouse gas emissions in 2006.<sup>48</sup>

Also in 2006, RJ Reynolds launched its Corporate Social Responsibility (CSR) Report.<sup>49</sup> On the issue of environmental harm, it essentially states that the company will continue litter education and reduction programs and exploring bio-degradable products. This did not differ from previous or current commitments by the company. A 2009 Reynolds American, Inc. (RAI, which owns RJ Reynolds) presentation on “reputation management” proposed to “expand the box’ to issues currently “in the company’s perimeter” to include biodegradable filters, recycled packaging/pucks, carbon footprint (significant shift to alternative / renewable energy sources.” These were perceived to be “game

changing” compared with existing CSR activities.<sup>50</sup> Another 2009 presentation on “Consumers’ Insights Innovations” discusses a range of consumer issues based on environmental concerns. It classifies consumers from “Naturalites, [those who buy mainstream green product offerings], to LOHAS [Lifestyles of Health and Sustainability] which “go to the extreme.”<sup>51</sup> The document further states that,

*The LOHAS mindset is mainstreaming and is prevalent among tobacco consumers. Highlight % of people that are conscious, and the trend is rising. TOBACCO USERS and SMOKERS – 18% naturalites and 13% LOHAS. And that means consumers are demanding manufacturers to meet their desires for more efficient, less wasteful products that have less harm to the environment. Consumers are changing their minds in fundamental ways that will impact businesses – even RAI! <sup>51</sup>*

It is unclear what products RAI may have launched specifically to this consumer segment, although its vaping product, Vuse, claims to be the first “carbon neutral vapor brand.”<sup>52</sup>

As previously mentioned, all major tobacco companies have statements and programs on their websites about the environment and sustainability.<sup>53-55</sup> Altria, the parent company of PM USA, messaging commits to implement “environmentally sustainable practices where possible,” and to consider the environment in its “business processes,”<sup>56</sup> but it does not specify what it considers as feasible within the range of possibility or what the outcome of these considerations might be.

## **Conclusion**

In the past 40 years, the tobacco industry has repeatedly expressed concern about the environmental impact of tobacco, specifically, TPW, without taking any effective measures to mitigate the problem upstream. The tobacco industry conducts market research and consumer surveys to develop its public relations campaigns focused on the environment. The companies were aware of the environmental concerns about tobacco waste, and opted for highly visible, and mostly ineffective, cleanup programs. Current industry campaigns and initiatives resemble initiatives and campaigns from the past. The more recent addition of self-reporting on the environmental impact of manufacturing and distribution appears to perpetuate the industry's focus on public relations and image instead of addressing the TPW problem directly. The tobacco industry continues to oppose policies such as the elimination of cellulose acetate filters, a primary source of plastic TPW, which could reduce its environmental impact.<sup>57</sup>

Public health policies should focus on minimizing the environmental externalities of tobacco products and implementing policies and regulations that will make the tobacco industry accountable for the harm it causes to the environment, along the entire life cycle of tobacco production.<sup>15</sup>

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