

# **Cigarette Butt Waste Meets Extended Producer Responsibility**

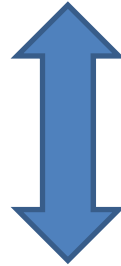
**Clifton Curtis, Director, The Varda Group**

**\* \* \***

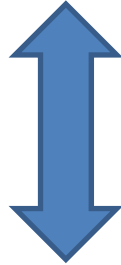
**IUCN-DCMC October 20, 2011 Event at Legacy on  
“Marine and Coastal Impacts of Cigarette Butt Waste”**

# Key Take-Aways

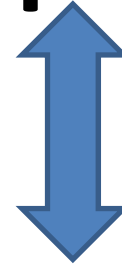
Polluter Pays Principle



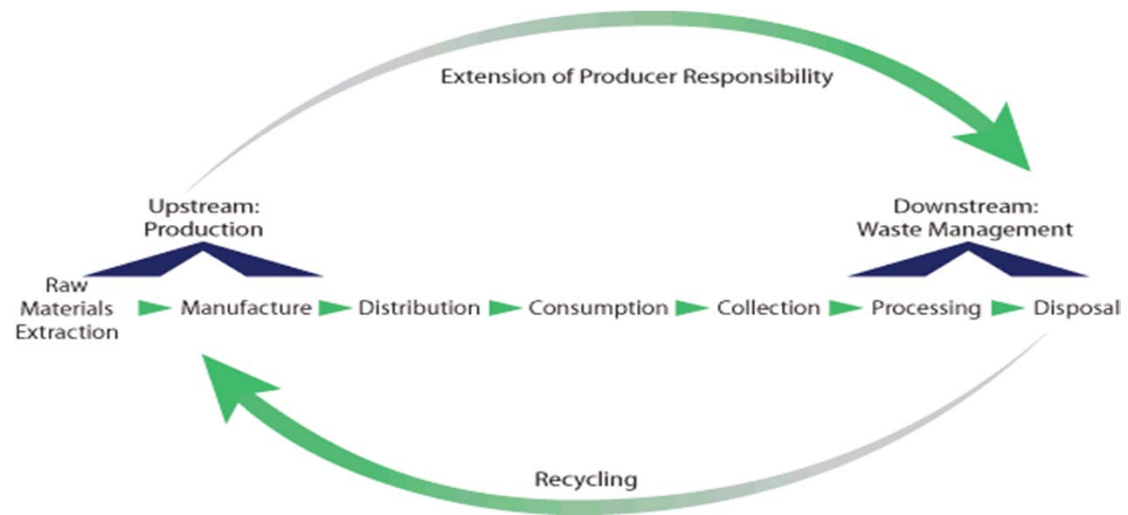
## Extended Producer Responsibility



Product Stewardship



Design for Environment



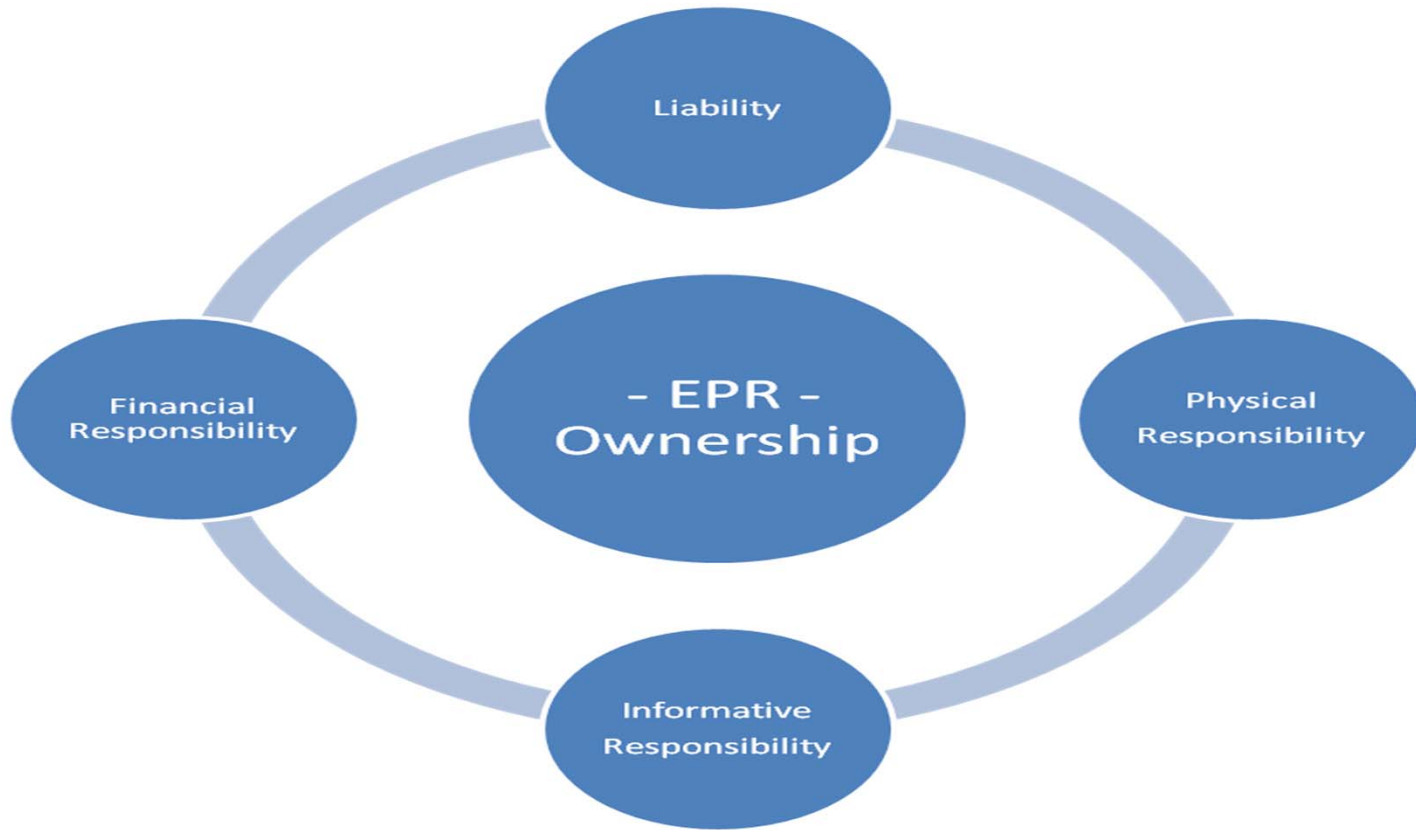
## Schematic of the EPR Process

Credit: Clean Production Action

# EPR Definition

- EPR is a policy principle to promote total life cycle environmental improvements of product systems by extending the responsibilities of the manufacturer of the product to various parts of the entire life cycle of the product, and especially to the take-back, recycling and final disposal of the product.

- Thomas Lindhqvist (2000)



## **LIABILITY – FINANCIAL – PHYSICAL - INFORMATIVE**

Model for Extended Producer Responsibility (Lindhqvist (1992))

## EPR Model – Specific Responsibilities (Part I)

- **Liability** – responsibility for proven environmental damage caused by product. Extent of liability determined by law, and may embrace different parts of the life cycle.
- **Financial** – will cover all or part of the costs for e.g. collection and final disposal. Paid directly by producer or by a special fee.

## EPR Model – Specific Responsibilities (Part II)

- **Physical** – characterizes the systems where the manufacturer is involved in physical management of the products or of the effects thereof
- **Informative** – requires producer to supply information on the environmental properties of the products he is manufacturing (transparency)

# Why should producers pay for their product waste management?

- **It closes the loop back onto the producer.** It encourages the producer's adoption of sustainable product design because they are responsible for take back, recycling, reuse and disposal in their end-of-life products. It is cheaper and safer to design non-hazardous products.
- **It embodies the “polluter pays” principle.** EPR shifts waste management costs from the public sector back to the private sector, instead of local government and the general taxpayer
  - 
  - Clean Production Action

## Key Elements of a Good EPR Policy

- Responsibility clearly focuses on the producer
- Producers individually responsible (or collectively if clearly agreed) for their brand name products
- Full costs of end-of-life, including collection, are internalized in retail price (municipalities should not subsidize the system)
- Hazardous chemicals and materials are eliminated in product design
- Land filling, export or incineration of end-of-life products are not considered recycling

## Relevant EPR Considerations

- Mandated or voluntary product **take-backs** , as well as individual vs. collective approaches
- Advance or subsidized **recycling fees** (if appropriate)
- **Cost feasibility** for design, implementation and compliance enforcement
- Varied **policy objectives**: reduction in waste volumes generated; reduction in waste disposed; reduction in hazardous constituents in waste stream; lowering of pollution in pre-consumption stages; increased DfE; or all of these, among others

## EPR and Product Stewardship

- The US EPA advocates **Product Stewardship or Extended Product Responsibility**, as a product-centered approach to environmental protection, involving all parties in the product's life cycle sharing responsibility for reducing the environmental impacts of products.
- Rather than debate differences, best to apply the two approaches as interchangeable - mutually compatible, while promoting efforts towards more complete producer responsibility

## EPR and DfE

- Three core concepts embedded in DfE:
  - Design for environmental processing and manufacturing;
  - Design for environmental packaging; and
  - Design for disposal or reuse
- As with Product Stewardship, best to treat DfE as mutually compatible with EPR, while promoting efforts towards more complete producer responsibility

## Waste Electrical and Electronic Equipment (WEEE) – good example of EPR in practice

- Requires Member States to encourage design and production methods that address future dismantling and recovery of their products
- Embraces broader “take back” goals:
  - encourages companies to design products for reuse, recyclability, and hazardous and other materials reduction;
  - corrects market signal to consumers, incorporating waste management costs into product prices; and
  - promotes innovation in recycling technology

## Closing Observations

- EPR merits more aggressive, targeted promotions
- Awareness raising, generating simple and strong messages using multiple outlets and targets
- EPR principle a centerpiece for reducing, preventing and eliminating environmental impacts from cigarettes – esp filters/buttwaste
- Increased alliances, networking needed among environmental and tobacco control NGOs, as well as other simpatico forces (e.g. local communities, faith groups, state governments, green industries)