ASH Scotland response to the Scottish Government consultation on the Draft Circular Economy Strategy

Deadline: 13 January 2026

About Action on Smoking and Health Scotland

ASH Scotland (Action on Smoking ASH Scotland (Action on Smoking and Health Scotland) is a registered Scottish charity. We work in and for Scotland at national, UK and international levels, taking action to reduce the harms caused by tobacco and related products to achieve a tobacco-free generation by 2034.

We do not engage with nor take funding from the tobacco and related products industries or vested interests; and implement Article 5.3 of the World Health Organisation's Framework Convention on Tobacco Control (FCTC).

Question 1: To what extent do you agree with the vision and outcomes of the strategy?

Strongly agree

Question 2: Do you have any comments on the vision?

ASH Scotland welcomes and supports this vision as a strong and necessary policy framework, however, we assert that tobacco control is a critical, overlooked component of achieving a circular economy.

ASH Scotland strongly supports the vision for a circular, net zero, and nature-positive Scotland by 2045. We commend the Scottish Government for embedding principles of social equity, reduced global impact, and a thriving economy within this framework.

The vision's focus on reducing the "negative global impact of our production and consumption" aligns directly with the need to address the devastating environmental cost of tobacco. From deforestation and water-intensive cultivation [1] to toxic chemical pollution from manufacturing [2] and littered plastic filters, [3] tobacco is a profoundly linear (also known as 'take-make-waste') and damaging product. A true circular economy must include strategies to phase out such inherently wasteful and harmful substances.

ASH Scotland welcomes the commitment that opportunities and benefits will be "fairly distributed across society." This must include protecting our most disadvantaged communities, who suffer the highest rates of tobacco use and the associated health, financial, and environmental burdens. A just transition to a circular economy should explicitly aim to reduce health inequalities exacerbated by harmful product consumption. The vision to become a "nature positive nation" is incompatible with the continued toll of tobacco and related products. Cigarette filters are the most littered item globally, [4] leaching microplastics and toxins into soils and waterways. Tobacco farming degrades land and biodiversity. [2] Achieving this goal requires specific measures to tackle tobacco as a source of environmental pollution.

ASH Scotland notes that this vision connects to *Scotland's Climate Change Plan – 2026-2040* and the *Scottish Biodiversity Strategy to 2025*. We urge explicit recognition that tobacco control is included in climate action and biodiversity protection. Reducing tobacco and recreational nicotine consumption is a direct contributor to these interconnected goals and must be integrated into circular economy implementation plans.

The success of the vision depends on concrete actions. We urge the Scottish Government to ensure that forthcoming circular economy plans will include:

- Extended Producer Responsibility (EPR) for tobacco and recreational nicotine products that fully accounts for their end-of-life environmental costs
- measures to reduce single-use consumption of all harmful products, including tobacco
- support for a just transition for farmers away from tobacco cultivation towards sustainable livelihoods, contributing to both circular economy and "nature positive" outcomes
- active commitment to implementing the Framework Convention on Tobacco Control and, in line with FCTC Art 5.3, to protecting policies relating to tobacco reduction from industry interference.

A healthy population and a healthy planet are inseparable. ASH Scotland urges that the Scottish Government ensures that the journey toward a circular Scotland actively addresses the threats posed by tobacco and related products; in doing so, they will advance public health, social justice, and environmental sustainability simultaneously.

Question 3: Do you have any comments on the outcomes?

ASH Scotland welcomes the outcomes described in the Draft circular economy strategy consultation. To achieve these goals, the strategy must explicitly confront products like tobacco that are fundamentally incompatible with a circular, just, and healthy society.

The tobacco industry is the antithesis of an economy with sustainable jobs and reduced dependency on volatile raw materials. Tobacco creates costs, not value: Scottish Government analysis estimated a public spending cost of smoking to Scotland, including wider costs to the health service, social care and responding to fire-related incidents, of £1.56 billion in 2024, projected to reach £2.5 billion by 2035-36, [5] as well as immense productivity losses. The tobacco industry drives a demand for virgin materials (tobacco leaf, paper, plastic filters) for a product designed to be consumed and discarded, with no actual value. Similar concerns apply to other recreational nicotine products, including (in the case of vapes and heated products) a profligate waste of scarce resources such as lithium. Economic innovation must be directed towards phasing out linear, harmful industries (and in the case of tobacco, a sunset industry with plans to phase out the products under the Tobacco & Vapes Bill proposals) and supporting a just transition for retailers and communities away from tobacco and nicotine dependency. True economic resilience means investing in industries that will improve societal wellbeing, not undermine it.

The reduction of the demand for virgin materials and the limitation of extractive industries cannot be achieved without addressing tobacco as a driver of environmental harm. Cigarette filters are single-use (mostly plastic), and the most littered item globally, leaching toxins. [6] Tobacco cultivation drives deforestation, pesticide use, and soil degradation internationally. [2] The entire lifecycle—from cultivation to toxic post-consumer waste—directly contradicts "minimising our impact across the supply chain."
ASH Scotland recommends that the Environmental Outcome explicitly include "tackling pollution from harmful products". Measures such as Extended Producer Responsibility (EPR) for tobacco and recreational nicotine products, with levies to fund prevention, are essential to deliver this outcome.

ASH Scotland strongly endorses taking responsibility for Scotland's global footprint. Scotland's tobacco use has a damaging global impact, directly contributing to deforestation, unsustainable water consumption, and child labour within supply chains [7] The leakage of harmful materials into the environment is starkly illustrated by the worldwide pollution caused by cigarette filters. Similar concerns hold true for other recreational nicotine products.

ASH Scotland recommends that Scotland uses its influence worldwide to advocate for global supply chain justice. This includes supporting international efforts to regulate tobacco and related products as an environmental and social hazard (known to involve child labour) and ensuring that circular economy policies account for the overseas footprint of products sold here.

ASH Scotland supports the draft circular economy strategy's focus on fairness, inclusivity, a just transition, and healthier communities. Tobacco is a primary driver of health inequality, and its use is concentrated in our most deprived communities. [8] It impoverishes households, [9] undermines community health, and

creates litter that blights local environments. A fair circular economy cannot perpetuate the disproportionate harm caused by such products.

ASH Scotland recommends that the Social Outcome must be directly linked to reducing health inequalities. A just transition needs to prioritise community-level benefits from circular economy investments in areas hardest hit by tobacco harm as well as explicitly aiming to reduce the financial drain of smoking on low-income households, freeing up resources for essentials. Cleaner, healthier communities with less litter can only be achieved with robust tobacco reduction strategies.

The tobacco industry, like all linear and harmful systems, needs to be addressed. Tobacco control is a circular economy policy, it reduces demand for virgin materials, eliminates toxic waste, alleviates global supply chain harms, and is a profound act of social justice. ASH Scotland urge that harm reduction and public health principles be integrated into the strategy's implementation, ensuring that the circular economy actively phases out products that undermine its goals.

Question 5: Do you have any comments on the policy mechanisms identified?

ASH Scotland sees tobacco control as a component of a truly circular and healthy Scotland.

The policy mechanisms listed in the draft strategy are essential for delivering a circular economy. These mechanisms should be applied to confront products that are systemically harmful to health, equity, and the environment. Tobacco is a critical test case for the robustness of this framework.

Support for circular business models needs to be strategic and values-driven. Public investment should not indirectly subsidise nor assist in any way industries whose core product is incompatible with circular and societal goals. Business support programmes must have clear criteria that exclude or phase out support for businesses reliant on the sale of inherently linear, toxic, and health-harming and addictive products like tobacco. Instead, support should be prioritised for evidence-based organisations helping people quit (e.g., NHSS smoking cessation services) or to support retailers to diversify into more sustainable, healthy product lines as part of a just transition.

Behaviour change by people who smoke is a vital mechanism, but it must be understood as more than just consumer choice. It requires health promoting environments and norms to be shaped to make the healthy, circular options the most straightforward and where possible the cheapest choice.

ASH Scotland recommends that a comprehensive behaviour change strategy must include denormalising the use of harmful, wasteful products. This aligns with ‘Tobacco-free generation’ ambitions. Policies should reduce the visibility and accessibility of tobacco, while public campaigns must highlight its environmental footprint and social cost, as well as its health harming effects, to connect with circular economy values. Focusing on communities is key to a just transition. ASH Scotland recommends that place-based initiatives in communities with high tobacco prevalence explicitly link circular economy benefits (e.g., green spaces, litter reduction, local job creation) with tobacco control. For example, investing in circular economy job training in areas disproportionately burdened by tobacco-related illnesses and expenditure to tackle environmental and health inequalities simultaneously.

ASH Scotland recommends that procurement policies across the public sector for facilities management, events, or catering on public premises should mandate tobacco and recreational nicotine aerosol-free environments and supply chains, using procurement to create healthier, cleaner public spaces and reduce toxic waste burdens.

ASH Scotland recommends that skills and education programmes incorporate understanding of the full lifecycle impacts of products. This means educating future designers, engineers, and business leaders about the linear lifecycle and socio-environmental harms of tobacco as a clear example of a failed product system.

Robust data is crucial for measuring progress and accountability. The proposed monitoring framework must include specific indicators on harmful linear products. In the case of tobacco and recreational nicotine products, this should track the volume of related litter collected, the carbon and ecological footprint of tobacco and recreational nicotine consumption in Scotland, and the household expenditure on tobacco and

related products in deprived versus affluent areas (as an indicator of social equity). Progress in reducing smoking prevalence and recreational nicotine use can be used as a key metric for reducing material consumption and waste. This data must inform the full cost recovery from producers via EPR schemes.

ASH Scotland endorses the perspective that a siloed approach to developing a circular economy will fail. Systems thinking demands that tobacco control is recognised as circular economy policy. ASH Scotland recommends that government strategy must actively align with public health, reducing demand for harmful products, as well as with environmental protection: regulating polluting products and with social justice: addressing poverty driven by harmful consumption.

The Scottish Government's Climate Change Plan must acknowledge tobacco's and nicotine's carbon and deforestation footprint. True alignment means the Circular Economy Unit, Public Health Scotland, and environmental regulators need to collaborate to co-design interventions to phase out the use of such products.

Question 6: Do you have any comments on the associated plans and priorities?

ASH Scotland notes the selection of five priority sectors based on material throughput and carbon impact. While these sectors are significant, the strategy omits a sector defined not by a material, but by a harmful product system that cuts across all of them: tobacco and related products. We emphasise the need for the proposed circular economy strategy to address harmful consumption patterns (using tobacco as an example) as a cross-cutting priority.

A purely sectoral approach risks missing pervasive, cross-cutting product harms. Tobacco consumption impacts the built environment (litter, fire risk, remediation costs), transport (litter from vehicles and transport hubs), and the food system (through competition for agricultural land and retail space). Its lifecycle affects energy, water, and waste systems. The strategy must mandate taking a harmful product lens across all sectoral plans.

With regard to the built environment, construction and energy projects should create tobacco-free environments. Public investment in new housing, hospitals, schools, and renewable infrastructure must default to smoke-and aerosol-free grounds and incorporate design that discourages smoking (e.g., safe, attractive communal spaces without smoking areas). This reduces toxic litter, fire risk, and future remediation costs from smoke contamination, aligning with circular principles of designing out waste and pollution.

With regard to food, tobacco cultivation degrades land and diverts resources from food production. A just transition towards a circular bioeconomy should include support for former tobacco-growing regions (globally, through responsible procurement policies) and local retailers to shift away from tobacco and nicotine products to sustainable, healthy food production and sales and to resist the misinformation and influencing of the industry against effective measures.

ASH Scotland recommends that the Scottish Government introduce a sixth, cross-cutting priority: "Tackling harmful product systems". This priority should focus on products designed for linear, harmful consumption such as tobacco and recreational nicotine products. This would provide a coherent framework for addressing these health-harming consumables. Circular economy principles should be applied through the elimination of demand for tobacco and commercialised nicotine products, the circulation of materials only in safe, non-toxic loops, and the regeneration of health and environments harmed by these products. The priority to tackle harmful product systems should align with policy on public health, reduction of inequalities and environmental quality goals in a systemic way.

A deliberate focus is needed to eradicate the linear flows of the most harmful products such as tobacco and commercialised nicotine products. ASH Scotland urges the integration of a 'harmful product framework' across these sectoral priorities to ensure Scotland's circular economy is truly regenerative for both the environment and for people.

Question 7. To what extent do you agree with the priority sectors identified?

Neither agree or disagree.

Question 8: Do you have any comments on the priority sectors identified?

ASH Scotland welcomes the Scottish Government's ambitious framework for a circular economy. We advocate that in addition to the priority sectors identified, tobacco and nicotine related waste be made a priority stream. Tobacco and nicotine products create a pervasive, toxic, and costly form of pollution that impacts every one of the sectors identified in the draft circular economy strategy:

The built environment: cigarette filters are the most littered item in Scotland, blighting our streets, parks, and communal spaces. [10] They leach nicotine, heavy metals, and microplastics into soils and waterways, creating long-term remediation costs. [11]

Net zero energy infrastructure: the lifecycle of tobacco—from cultivation to manufacturing to distribution—is carbon and resource-intensive. [12] A circular economy strategy should address high-carbon, low-benefit products.

Transport: litter from vehicles, including cigarette-related waste, is a major source of roadside pollution and a significant cleaning cost for authorities. [13]

The food system: tobacco cultivation displaces food crops, uses large amounts of pesticides and water, and contributes to deforestation and soil degradation globally. [14]

While sector-specific plans are essential, ASH Scotland believes that a circular economy strategy must address product-specific pollutants that cut across all sectors. We urge the Scottish Government to explicitly include tobacco and commercialised nicotine products within this plan. Circular economy solutions for this uniquely harmful waste stream are to accelerate our journey to a smoke-free Scotland, reducing demand at source, banning cigarette filters which are a significant source of litter and provide no health benefits, [15] and mandating a polluter pays model for tobacco and nicotine industries as well as minimising the promotion and visibility of these products.

A circular economy must be a healthier economy. Prioritising the elimination of tobacco waste would deliver a double win for Scotland's environment and the nation's health.”

Question 8a: Do you have any comments on the plans and priorities for the built environment?

N/A

Question 8b: Do you have any comments on the plans and priorities for the Net Zero Energy Infrastructure?

N/A

Question 8c: Do you have any comments on the plans and priorities for textiles?

N/A

Question 8d: Do you have any comments on the plans and priorities for the transport?

N/A

Question 8e: Do you have any comments on the plans and priorities for the food system?

N/A

Question 9: Do you have any comments on the proposed approach to product stewardship?

ASH Scotland supports the principle of evidence-based product stewardship and the 'polluter pays' model applied to producers as a crucial tool for reducing environmental harm. However, the proposed approach omits the most littered and toxic consumer product in Scotland: tobacco.

The draft circular economy strategy acknowledges existing UK-wide schemes for packaging, batteries, and vehicles. Tobacco and commercialised nicotine products are a composite product of all three of these—cigarettes consist of plasticised cellulose acetate filters (plastic waste), paper, and often come in plastic-lined packaging, while vapes contain lithium-ion batteries Yet, tobacco products are entirely absent from the list.
The evidence surrounding tobacco and nicotine products is overwhelming:

- Cigarette filters are the number one littered item globally and in Scotland. [3]
- They contain over 7,000 toxic chemicals and leach microplastics. [16]
- Vaping devices, in particular single or limited use devices. created a new and rapidly growing stream of plastic and electronic waste. [17]

If the principles of the Scottish Government's approach to product stewardship—alignment with the EU, UK collaboration, and the waste hierarchy—are to be followed, then immediate action is required on tobacco and recreational nicotine products. Scotland should be leading the development of policies to hold the tobacco industry fully accountable for the damage done to the health and environment in our communities.

Tobacco and vaping or heated products must be declared an immediate priority for robust, mandatory Extended Producer Responsibility (EPR) schemes. The industry that profits from creating addiction must be made fully responsible for recovery of the full lifecycle cost of its toxic, persistent waste. Public health and environmental policy must be aligned; a truly circular economy cannot afford to circulate the poisons from tobacco.

Question 10: Are there any changes or additions that you would like to suggest in relation to the Circular Economy Monitoring and Indicator Framework to ensure it is fit for purpose?

No

Question 10a: Do you have any comments in relation to the indicators proposed for outcome "The economic value derived from material use is maximised without increasing our environmental impacts"?

ASH Scotland is focused on the environmental and public health harms of tobacco and nicotine products. We note that this outcome seeks to decouple economic value from environmental harm—a core principle of a true circular economy. The tobacco and commercialised nicotine sector is the antithesis of this outcome. The economic value derived from tobacco and recreational nicotine material use (in cigarettes, packaging or vapes, heated products, pouches) is directly and intrinsically linked to massive, proven environmental impacts across the entire lifecycle. From deforestation and pesticide use in cultivation, [18] to the energy and resource use in manufacturing, [19] to the pervasive pollution from toxic, non-biodegradable waste, [20] these products' 'value' is inseparable from their harm. The framework and proposed outcomes need to specifically measure and confront this reality.

ASH Scotland urges the inclusion of a disaggregated indicator that tracks the 'economic value-to-environmental cost ratio' for specific, harmful product categories such as tobacco and recreational nicotine products. This indicator would measure the GDP or GVA contribution of the tobacco and nicotine sector against its full lifecycle environmental cost (carbon, water, pollution) and its end-of-life clean-up cost to the public purse, revealing whether economic value is being derived sustainably or destructively.

The indicator must also integrate the ‘cost of harm’ into economic calculations. It needs to quantify the externalised costs imposed on society by linear, polluting products. For tobacco, this would include: public expenditure on litter clean-up (an economic drain on local authorities with the added risks of uncontrolled exothermic reactions from battery driven devices like vapes), the cost of environmental remediation from microplastic and chemical leaching, the lost economic productivity from tobacco and nicotine-related ill health (a separate but related societal cost) and the international harms imposed by domestic consumption.

The phrase ‘economic value’ must be interpreted in its broadest sense to include social and natural capital. The sale of cigarettes, vapes, and other nicotine products generates short-term monetary 'value,' but the products are discarded as waste destroying natural capital and creating long-term social harms.

ASH Scotland advocates for specific mechanisms to expose and track the net negative 'value' of inherently health harming and wasteful product streams like tobacco and commercialised nicotine products. System level analysis is required that explicitly contrasts economic activity with environmental degradation and harms to health, putting a spotlight on tobacco and commercialised nicotine products as primary examples.

Indicators for the outcome “The Scottish economy is more resilient to disruptions in global supply of materials, including critical raw materials” need to pivot from a purely economic analysis to one that scrutinises societal need, public health, and the strategic vulnerability created by addictive products.

ASH Scotland argues the proposed indicators for this outcome must do more than measure dependency on imported raw materials; crucially, they must evaluate the strategic wisdom and societal value of what those materials are used for. The supply chain for tobacco and commercialised nicotine products represents a form of strategic vulnerability that the indicator framework must expose.

Indicators need to differentiate between ‘essential’ and ‘harmful’ dependencies. For example, a reliance on imported lithium for renewable energy storage is categorically different from a reliance on imported lithium for vapes. The former builds societal resilience, the latter creates double vulnerability, affecting both supply chains and adversely impacting public health.

ASH Scotland recommends using an indicator that specifically tracks the proportion of critical raw materials (e.g., lithium, cobalt, plastics) destined for non-essential and health-harming products. This would highlight where resilience efforts should be focused first. The tobacco and commercialised nicotine supply chain is non-resilient. It is a linear, globally dispersed, and health-damaging chain that ends with a toxic, littered waste product. It does not contribute to a circular or resilient Scottish economy. ASH Scotland believes that a key indicator of true resilience should be the year-on-year reduction in material throughput (tobacco leaf, cigarette papers, filters, plastic, batteries) for tobacco and recreational nicotine products.

Resilience also means reducing the economic burden of waste. The clean-up costs for tobacco and nicotine product litter represent a recurring, predictable drain on local authority budgets, funded by Scottish taxpayers. This is a domestic economic impact of a global supply chain. ASH Scotland proposes a supplementary indicator: “Annual public expenditure on managing the waste of identified harmful, non-essential imported products.” This would quantify the long-term fiscal liability created by certain supply chains.

For products that confer no societal benefit and cause immense harm, the ultimate resilience strategy is to reduce and phase out the health harming products. The indicator framework would then be explicitly linked to public health goals. An indicator measuring progress in reducing material consumption of identified harmful product streams would align supply chain resilience with the strategic goal of a tobacco-free Scotland.

ASH Scotland urges that indicators be developed to specifically identify and track supply chains for products that actively undermine public health and create long-term environmental liabilities. Building a resilient economy means strategically reducing our dependency on the materials that feed the tobacco epidemic, thereby strengthening both our economic and health security. True resilience is not just about securing supply, but about critically evaluating demand. The tobacco supply chain is a prime example of a maladaptive dependency that the indicators must help identify and phase out, turning an economic resilience goal into a lever for public health advancement.

Question 10c: Do you have any comments in relation to the indicators proposed for outcome "Business and entrepreneurs have opportunities to develop circular economy innovations"?

Care must be taken that tobacco/commercialised industry Corporate Social Responsibility (CSR) initiatives are not permitted, in line with the WHO FCTC Art 5.3 guidance which defines these as promotional activities for corporations whose aims are fundamentally and irreconcilably opposed to those of public health.

Question 10d: Do you have any comments in relation to the indicators proposed for outcome "Non-renewable resource extraction is minimised and renewable resource use is sustainable"?

The tobacco and recreational nicotine industries represent unsustainable, extractive linear consumption. Most cigarette filters are made of cellulose acetate, a plastic derived from fossil fuels. Vapes and heated products contain lithium, cobalt, copper, and plastics—all non-renewable, critically sourced materials. Tobacco cultivation is notoriously resource-intensive, driving deforestation, depleting water supplies, and degrading soils with heavy pesticide use. It is a primary example of unsustainable renewable resource use, often displacing food crops. [21]

Aggregate national figures on the use of the materials listed above would mask how these materials are being wasted. ASH Scotland advocates that the lifecycle material footprint per unit of identified harmful, non-essential products (e.g. tobacco and commercialised nicotine products) be determined. This would measure the total mass of non-renewable and renewable resources extracted to produce, package, and distribute a given quantity of these products, exposing their disproportionate impacts.

The most effective way to minimise extraction for tobacco is to reduce demand. Indicators for this outcome should include a reduction in virgin materials (plastics, metals, tobacco leaf) entering the Scottish market as part of tobacco, vapes and other nicotine products. Reducing the prevalence of smoking would drive progress on this indicator marrying health and environmental policy.

A generic set of indicators will allow the tobacco and commercialised nicotine industry's profoundly unsustainable model to continue unchecked. For this outcome to be credible, it must name, measure, and target the worst offenders. ASH Scotland calls for the development of specific, product-level indicators that force transparency on the tobacco and recreational nicotine sector's resource extraction and use, creating an evidence base for policies that can minimise this health-harming and wasteful throughput.

Question 10e: Do you have any comments in relation to the indicators proposed for outcome "The negative environmental impact of our production, consumption and disposal is minimised"?

Tobacco, vapes and other recreational nicotine products are a premier example of a negative environmental impact. In order to be considered credible, proposed indicators must explicitly measure these impacts.

The outcome: "The negative environmental impact of our production, consumption and disposal is minimised" is at the heart of a circular economy. Proposed indicators need to specifically track the lifecycle impact of the most pervasively polluting consumer product in Scotland: tobacco. All three stages of the tobacco product lifecycle (production, consumption and disposal) have negative impacts.

Production causes deforestation, intensive pesticide/water use, and carbon emissions from curing and global logistics. Consumption of tobacco and nicotine products releases toxicants directly into the air and creates an immediate waste product (the discarded cigarette filter). Disposal of cigarettes and nicotine products is a failure: cigarette filters are the world's most littered item, and discarded vapes/heated products which leach nicotine, heavy metals, and microplastics for over a decade after being thrown away.

ASH Scotland advocates that the framework includes a dedicated indicator for toxic litter. Generic waste tonnage or recycling rate indicators would not capture the unique, toxic burden of tobacco litter which also harms marine and land-based wildlife. We call for the inclusion of a: "toxicity-weighted litter index". Such an indicator would specifically monitor the density and distribution of discarded cigarette filters, tobacco

packaging, and discarded vaping/heated devices in the environment through standardised surveys (e.g., LEAMS data) [21], measuring the impact, not just the mass.

The negative impact of the tobacco and commercialised nicotine industries is not just ecological; it is also economic. The public sector is paying for clean-up, and a critical indicator is the amount of annual public expenditure spent on the remediation and disposal of tobacco and commercialised nicotine product waste. This quantifies the direct fiscal impact of this pollution, spotlighting the injustice of public money being spent on cleaning industry messes where the multinational corporate producers continue to enjoy the profits. The most effective way to minimise the environmental impact of tobacco/recreational nicotine is to reduce its consumption. To help achieve this, the indicator framework must explicitly link to public health goals. A core indicator for this outcome should be correlation between smoking/vaping/heated product prevalence rates and the volume/toxicity of associated waste. A demonstrable downward trend in these metrics is the clearest proof that negative environmental impact is being minimised.

ASH Scotland urges the Scottish Government to make mandatory the inclusion of product-specific indicators that track the lifecycle pollution of tobacco, its economic clean-up cost, and the success of policies aimed at eradicating it. A circular economy cannot turn a blind eye to a product designed to be consumed and thrown away, poisoning our environment at each stage of its lifecycle. ASH Scotland proposes using indicators that make this pollution impossible to hide, directly tying environmental success to public health progress.

Question 10f: Do you have any comments in relation to the indicators proposed for outcome “The negative impacts experienced internationally from production, consumption and disposal are reduced”?

ASH Scotland has long spotlighted the globalised harm caused by the tobacco and nicotine industries. Products consumed in Scotland have profound international impacts; their environmental and social damage being externalised to producer countries.

ASH Scotland notes that this outcome recognises Scotland's responsibility for the international footprint of its consumption. No product better exemplifies the catastrophic outsourcing of negative environmental and social impacts than tobacco. The negative impacts experienced internationally from Scotland's consumption of tobacco are severe and systemic. Tobacco cultivation drives deforestation, biodiversity loss, and soil degradation in producer nations. It is a pesticide-intensive crop that pollutes local waterways and harms farmworker health. [21] The filters and packaging littered in Scotland break down into microplastics and toxins that enter global oceanic currents, contributing to international pollution. [22] At the UN Climate Change Conference (COP28), the WHO intervened to frame tobacco not just as a health crisis, but as a major contributor to the plastic pollution and climate crises, thereby arguing for its inclusion in the Global Plastics Treaty. Specifically, they noted that the 12th meeting of the WHO Study Group on Tobacco Product Regulation recommended banning cigarette filters to reduce the palatability and appeal of cigarettes, remove consumer misconceptions about filters reducing health harms, and reduce a major source of toxic waste, including the microplastics deposited by cellulose acetate in filters, a conclusion mirrored by the 10th Report on the scientific basis of tobacco product regulation of the WHO study group released in 2025.

ASH Scotland proposes a dedicated indicator that forces transparency on the global consequences of local consumption.

For a product like tobacco, key metrics externalised to producer countries could include: hectares of deforestation attributed to tobacco leaf supplying the Scottish market; estimated volume of freshwater consumed and polluted in tobacco cultivation for Scottish consumption. And carbon emissions from the international transport of tobacco products, and the exposure of children through family farming and of tobacco producing countries through soil degradation.

ASH Scotland advocates that Scotland become less dependent on this harmful global chain, the most direct way to reduce international negative impacts is to reduce demand for the products that cause them. Therefore, a leading indicator for this outcome should be: year-on-year reduction in the volume of tobacco leaf imported for final consumption in Scotland. This would help track the decoupling of the Scottish economy from this damaging global supply chain.

The Scottish Government has expressed its commitment to ethical supply chains [23]. The indicators must therefore evaluate whether circular economy policies reinforce or mitigate social harm abroad. We suggest an indicator that assesses the application of human rights and environmental due diligence principles to the supply chains of identified, health-harming, high-impact products. For tobacco, this would measure efforts to address documented issues of child labour and unsafe working conditions in the global supply chain. To seek to reduce international negative impacts while ignoring the well-documented global ravages of the tobacco industry—from the Amazon to Malawi—is hypocritical. The industry's model is one of calculated externalisation, and our circular economy metrics must not facilitate this.

The international damage caused by tobacco and commercialised nicotine needs to be assessed. ASH Scotland urges the inclusion of product-specific indicators that trace local Scottish consumption back to its global consequences, ensuring that Scotland's circular transition delivers justice, not just at home, but for the communities worldwide that bear the heaviest burden of our consumption.

A circular economy needs a moral and global dimension. To achieve this, indicators must trace tobacco's true cost to its international origins: making clear that reducing Scotland's consumption is an act of global environmental and social justice.

Question 10g: Do you have any comments in relation to the indicators proposed for outcome "People and communities engage in and benefit from circular activities in a fair and inclusive way"?

ASH Scotland welcomes the focus on fairness and inclusion as pillars of the circular transition, however, we urge the Scottish Government to acknowledge that the tobacco and commercialised nicotine industries place disproportionate and unfair burdens on specific communities. Communities already experiencing disadvantage are disproportionately harmed. Any proposed indicators must capture and aim to rectify this injustice.

The negative impacts of the linear tobacco economy fall heaviest on communities with higher smoking prevalence, which are often those experiencing deprivation. These communities face: higher rates of tobacco-related disease and mortality; greater exposure to tobacco/related litter and associated toxins in their local environments; and a greater proportion of household income spent on tobacco, as well as having public funds diverted from local services to pay for clean-up and waste disposal.

Generic indicators on community participation will not reveal these disparities. ASH Scotland proposes specific, justice-focused indicators: such as a distributional analysis of environmental harm from tobacco and commercialised nicotine products. This would map the density of the toxic impacts of tobacco and nicotine use—including health-harming effects of smoking, second-hand smoke, and chemical leaching from discarded cigarette filters and electronic devices—against the Scottish Index of Multiple Deprivation (SIMD), revealing the correlation between pollution and poverty. Poorer populations frequently live in areas with higher densities of retailers selling tobacco and more frequent exposure to environmental tobacco smoke, leading to higher rates of related respiratory and cardiovascular diseases. [24]

This analysis is vital for addressing health inequalities, as it highlights that the most affluent in society have already reached historically low smoking rates while deprived communities may not achieve the same milestones for decades. [25] This analytic approach ensures that progress towards a tobacco-free generation reduces the life expectancy gap between the richest and poorest rather than merely improving national averages.

ASH Scotland calls for a proportion of Extended Producer Responsibility (EPR) revenues from harmful product streams (e.g. tobacco) to be reinvested in prevention, cessation, and remediation programmes within the communities most affected. This ensures the polluter pays to repair the damage where it is most felt.

For communities with high smoking and recreational nicotine-use rates, the primary circular activity that will benefit them is breaking free from the tobacco and addiction cycle. Therefore, key indicators of a fair and inclusive circular economy should include a reduction in the smoking prevalence gap between the most and least deprived communities. This public health metric is a direct measure of whether circular economy policies (like robust EPR that funds cessation) are delivering inclusive benefits.

Council taxpayers—especially in under-resourced areas—are currently burdened with clean-up and disposal costs. A core indicator of a fair system must be a percentage shift in the financial responsibility for tobacco waste management from local authorities (public funds) to producers (industry funds) through EPR.

A circular economy that is not designed to actively dismantle the entrenched inequities of the tobacco epidemic will perpetuate them. ASH Scotland urges that targeted, place-based indicators that measure the disproportionate burden of the tobacco and nicotine industries and track whether the benefits of new policies—like producer responsibility—are directed to the communities that have suffered the most. True inclusion means freeing these communities from the health, environmental, and financial traps of tobacco and recreational nicotine.

Question 10h: Do you have any comments in relation to the indicators proposed for outcome "Circular behaviours are the norm across business and society"?

ASH Scotland asserts that for circular behaviours to become the norm, the deeply entrenched linear behaviours that are actively harming our society must be confronted and dismantled. No behaviour is more normalised, more destructive, and more in direct opposition to circular principles than the consumption and littering of tobacco and commercialised nicotine products.

The entire lifecycle of a cigarette—extract, make, use once, discard irresponsibly—is the textbook definition of a linear economy. It is a habitual, socially tolerated behaviour that directly undermines every circular goal. Any indicator set that fails to measure the prevalence of this specific anti-circular behaviour is measuring in a vacuum. Surveys on "general environmental attitudes" are insufficient, and individuals should not be held solely responsible for the harms of these social and commercial determinants of harm. ASH Scotland advocates for behavioural indicators that target the problem directly. These should include tracking public perception of the acceptability of discarding cigarette filters and vaping/heated devices, with a goal of making it socially unacceptable.

The highest point on both the waste and health hierarchies is prevention. Therefore, the ultimate indicator that circular behaviours are becoming the norm is a population-level reduction in the consumption of identified, inherently linear, and health-harming products like cigarettes and vapes. A sustained decline in smoking and vape/heated products use is the clearest signal that society is rejecting a linear model for a healthier, less wasteful norm.

The ubiquity of tobacco litter is proof that a deeply wasteful linear behaviour remains the norm. For this outcome to be credible, its indicators must directly measure society's progress in abandoning the use of this specific, toxic product—through changed social attitudes and reduced consumption.

Question 11: Please provide any further information or evidence that should be considered in the accompanying Equalities Impact Assessment

ASH Scotland, as a public health charity focused on tobacco control and health inequalities, supports specific and robust consideration to how the strategy interacts with tobacco and nicotine-related inequalities. Tobacco use is a major driver of health inequalities in Scotland, disproportionately affecting many of the protected characteristic groups/ identified in the draft Equalities Impact Assessment (EQIA).

ASH Scotland advocates for a truly comprehensive and proactive EQIA that would consider the strategy's impact on existing public health priorities and the inequitable distribution of harmful products. While not a protected characteristic under the Equality Act 2010, the Scottish government's *National Performance Framework* and *Public Sector Equality Duty (PSED)* encourages consideration of socio-economic disadvantage. ASH Scotland emphasises that smoking prevalence is significantly higher among people living in poverty and in deprived communities, leading to severe health consequences as well as community clean-up costs.

ASH Scotland advocates that the EQIA explicitly assess how circular economy interventions might affect these groups in terms of financial strain, access to cessation support, and exposure to marketing of harmful products like tobacco. EQIA also needs to address the environmental and social costs of tobacco waste in

communities with high smoking prevalence, which are often more deprived and whose household budgets and individual wellbeing and health are adversely impacted by the use of tobacco and related products.

ASH Scotland recommends the Scottish Government commit to a cross-cutting analysis of how the Circular Economy Strategy's interventions will interact with key public health priorities—notably tobacco control and the reduction of health inequalities—as specific policies are developed. Future work should be informed by both the social and commercial determinants of health models, applying a specific lens to tobacco as Scotland's leading cause of preventable death and health inequality.

Question 12: Please provide any further information or evidence that should be considered in the accompanying Fairer Scotland Assessment

N/A

Question 13: Please provide any further information or evidence that should be considered in the accompanying Island Communities Impact Assessment

Tobacco and nicotine use create a distinct and severe set of challenges for Scotland's highlands and islands, amplifying the region's inherent geographic and socioeconomic pressures. The impacts cut across public health, personal finances, environmental sustainability, and community resilience in ways that demand a uniquely tailored policy response.

Financially, smoking places a crushing burden on household budgets. With the cost of living in remote rural and island areas estimated to be 15% to 30% higher than in urban parts of the UK, [26] the average annual expenditure of over £1,800 [27] on tobacco represents a significant diversion of funds from essentials like nutritious food, heating, and transport. This financial pressure directly fuels deep-seated health inequalities. Higher rates of smoking contribute to the greater prevalence of cancers, cardiovascular disease, and respiratory conditions in these regions, which are key factors in the lower healthy life expectancy observed in remote rural Scotland compared to the national average. [28]

Overcoming nicotine addiction is markedly harder in these communities due to significant barriers to support. Physical access to specialist stop-smoking services or even pharmacies for nicotine replacement therapy is severely limited by distance and transport links. Digital exclusion can hinder the use of online or phone-based support services.

The environmental impact of tobacco and vaping products is acutely felt in the region’s landscapes. Litter from discarded cigarette filters and vapes is a persistent and visually blighting problem, with clean-up and disposal costs falling to local councils and volunteer groups.

These health and financial impacts converge to worsen the region's pressing demographic challenges. Smoking-related ill health and premature mortality can accelerate the depopulation of working-age adults, reducing economic productivity and community vitality. At the same time, an aging population is more vulnerable to the chronic diseases and poorer mental health and wellbeing caused by smoking, thereby increasing future demands on remote social care and health services. This creates a cycle that undermines the long-term sustainability and resilience of island communities.

Question 14: Please provide any further information or evidence that should be considered in the accompanying Business and Regulatory Impact Assessment

The Business and Regulatory Impact Assessment (BRIA) is narrowly focused on direct business costs and macroeconomic benefits, ASH Scotland recommends that it more fully analyses the Circular Economy Strategy’s potential impacts on health inequalities, the commercial determinants of health, and the affordability of harmful products.

The BRIA treats public health outcomes as a separate issue rather than an integral part of economic impact. It mentions the “polluter pays” principle and cost transfers but does not apply this to the health and social costs of harmful products like tobacco. Neglect of public health is also an economic consideration,

and ASH Scotland recommends that the BRIA include a dedicated section analysing the strategy's potential impacts on health inequalities and the commercial determinants of health.

Question 15: Please provide any further information or evidence that should be considered in the accompanying Consumer Duty Impact Assessment

ASH Scotland recommends that the Consumer Duty Impact Assessment be edited to adopt a broader definition of consumer harm and explicitly recognise that “harm” includes long-term health harm, financial detriment from addictive products, and the exacerbation of inequalities.

Question 16: Please provide any further information or evidence that should be considered in the Child Rights and Wellbeing Impact Assessment

Scotland’s commitment to UNCRC commits us to protect children’s rights to health. There are both primary harms from commercialised promotions of recreational nicotine products in ways that attract young people to use them, and secondary harms from tobacco smoke and particulate aerosol exposure.

Question 17: Do you have any views on whether there are likely to be any positive or negative environmental impacts from the draft Environment Strategy that have not been identified in the Strategic Environmental Assessment?

N/A

REFERENCES

[1] WHO (2017). *Tobacco and its environmental impact: an overview*. World Health Organization. https://apps.who.int/iris/handle/10665/255574

[2] Novotny TE, Bialous SA, Burt L, Curtis C, da Costa VL, Iqtidar SU, Liu Y, Pujari S, Tursan d'Espaignet E. The environmental and health impacts of tobacco agriculture, cigarette manufacture and consumption. *Bull World Health Organ*. 2015 Dec 1;93(12):877-80. doi: 10.2471/BLT.15.152744. Epub 2015 Oct 22. PMID: 26668440; PMCID: PMC4669730.

[3] Truth Initiative. (2019). *Tobacco and the environment*. Truth Initiative. https://truthinitiative.org/sites/default/files/media/files/2019/05/Tobacco-and-the-Environment.pdf

[4] Ocean Conservancy. (2023). *International Coastal Cleanup 2023 Report: Cleaning Up Our Coastline, One Piece of Trash at a Time*. Ocean Conservancy. https://oceanconservancy.org/wp-content/uploads/2023/10/2023-ICC-Report.pdf

[5] Scottish Parliament. (2025, August 18). Written question and answer: S6W-39515. https://www.parliament.scot/chamber-and-committees/questions-and-answers/question?ref=S6W-39515

[6] Slaughter, E., Gersberg, R. M., Watanabe, K., Rudolph, J., Stransky, C., & Novotny, T. E. (2011). Toxicity of cigarette butts, and their chemical components, to marine and freshwater fish. *Tobacco Control, 20*(Suppl 1), i25–i29. https://doi.org/10.1136/tc.2010.040170

[7] Human Rights Watch. (2016, May 25). *"The harvest is in my blood": Hazardous child labor in tobacco farming in Indonesia*. Human Rights Watch. https://www.hrw.org/report/2016/05/25/harvest-my-blood/hazardous-child-labor-tobacco-farming-indonesia

[8] ASH Scotland. (2024, April). *Smoking and health inequalities in Scotland* [Fact sheet]. Action on Smoking and Health (Scotland). https://ashscotland.org.uk/wp-content/uploads/2024/07/Smoking-and-Health-Inequalities_April-2024.pdf

[9] ASH Scotland. (2025, February). *How much does it cost to smoke?* [Fact sheet]. Action on Smoking and Health (Scotland). https://ashscotland.org.uk/wp-content/uploads/2025/02/Cost-of-Smoking-factsheet-Feb-2025.pdf

[10] Keep Scotland Beautiful. (2024, November). *Scottish litter survey: Tracking public perceptions and attitudes towards litter and littering behaviour* [Report]. https://www.keepscotlandbeautiful.org/media/ss4ljeac/scottish-litter-survey-2024-final-311024.pdf

[11] Green et al. found that nicotine rapidly leached from test cigarette butts and estimated that one can contaminate 1000 litres of water with nicotine to levels that are chronically toxic to biota. Source: Green, A. L. R., Putschew, A., & Nehls, T. (2014). Littered cigarette as a source of nicotine in urban waters. *Journal of Hydrology*, 519, 3466–3474. https://doi.org/10.1016/j.jhydrol.2014.05.046

[12] WHO (2022). *Tobacco: poisoning our planet*. World Health Organization. https://www.who.int/publications/i/item/9789240051287

[13] Keep Scotland Beautiful. (2023, November). *Scottish litter survey: Tracking public perceptions and attitudes towards litter and littering behaviour* [Report]. https://www.keepscotlandbeautiful.org/media/ka1itwlf/scottish-litter-survey-2023-final-291123.pdf

[14] Novotny TE, Bialous SA, Burt L, Curtis C, da Costa VL, Iqtidar SU, Liu Y, Pujari S, Tursan d'Espaignet E. The environmental and health impacts of tobacco agriculture, cigarette manufacture and consumption. *Bull World Health Organ*. 2015 Dec 1;93(12):877-80. doi: 10.2471/BLT.15.152744. Epub 2015 Oct 22. PMID: 26668440; PMCID: PMC4669730.

[15] 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. *Tob Control*. 2022 Aug;31(e1):e80-e82. doi: 10.1136/tobaccocontrol-2020-056245. Epub 2021 Apr 26. PMID: 33903277; PMCID: PMC9340047.

[16] WHO (2017). *Tobacco and its environmental impact: an overview*. World Health Organization. https://www.who.int/publications/i/item/9789241512497

[17] DCW. (2023, June 19). Understanding E-waste: *How vaping devices contribute* [Blog post]. DCW. https://www.dcw.co.uk/understanding-e-waste-how-vaping-devices-contribute/

[18] United Nations Environment Programme (UNEP) & Secretariat of the Stockholm Convention. (2020). *Factsheet: Tobacco, Pesticides and the Stockholm Convention.*

[19] Tobacco Atlas. (2024, February 2). Tobacco and the environment. *Vital Strategies*. https://tobaccoatlas.org/features/tobacco-and-environment/

[20] Montalvão, M. F., et al. (2023). Cigarette: An unsung anthropogenic evil in the environment. *Environmental Science and Pollution Research*, 30, 59151–59162 https://link.springer.com/article/10.1007/s11356-023-26867-9

[21] Keep Scotland Beautiful. (2025). *Local Environmental Audit and Management System (LEAMS).* Keep Scotland Beautiful. https://www.keepscotlandbeautiful.org/local-environmental-audit-and-management-system-leams

[22] Belzagui, F., Buscio, V., Gutiérrez-Bouzán, C., Vilaseca, M. (2021). Cigarette butts as a microfiber source with a microplastic level of concern. *Science of The Total Environment*, 762, 144165. https://www.sciencedirect.com/science/article/abs/pii/S0048969720376968

[23] Scottish Government. (2025, November 17). *Scottish Government procurement strategy: April 2025 to March 2028*. The Scottish Government. https://www.gov.scot/publications/scottish-government-procurement-strategy-april-2025-march-2028/pages/15/

[24] Martin-Gall, V., Neil, A., Macintyre, K., Rehman, S., Nguyen, T. P., Harding, B., & Gall, S. (2024). Tobacco retail availability and smoking—A systematic review and meta-analysis. *Drug and Alcohol Review*, 43(7), 1718–1732. https://doi.org/10.1111/dar.13936

[25] Khan, J. (2022). *The Khan review: making smoking obsolete*. Office for Health Improvement and Disparities. https://www.gov.uk/government/publications/the-khan-review-making-smoking-obsolete

[26] Scottish Parliament Cross-Party Group on Islands. (2021). *Report on the cost of living in Scotland's island communities*. The Scottish Parliament. https://www.parliament.scot/chamber-and-committees/cross-party-groups/cost-of-living-in-island-communities

[27] ASH (England) (2017, March). *The economics of tobacco* [Fact sheet]. Action on Smoking and Health (ASH). https://ash.org.uk/uploads/Economics-of-Tobacco.pdf?v=1650642285

[28] National Records of Scotland. (2025, July 29). *Healthy life expectancy, 2021-2023*. National Records of Scotland. https://www.nrscotland.gov.uk/publications/healthy-life-expectancy-2019-2021/

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