

ANNUAL REPORT 2025

TPPFG

Tobacco Product Plastic Filter Group



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## ACRONYMS AND ABBREVIATIONS

SUPD	Single Use Product Directive
EPA	Environmental Protection Agency
DECC	Department of the Climate, Energy and the Environment
TPPFG	Tobacco Product Plastic Filter Group
MCEE	Minister for the Climate, Energy and the Environment
B&A	Behaviour & Attitudes

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Tobacco Product Plastic Filter Group CLG, Trident House, Dublin Road, Naas, Co. Kildare W91 VY6W



## Introduction

Welcome to TPPFG's Annual Report for 2025, reflecting our activities last year.

TPPFG is an Extended Producer Responsibility (EPR) company for tobacco filter products containing plastic in Ireland. TPPFG is a non-profit company set up by tobacco product filter manufacturers to help deliver on their obligations under the European Union (Extended Producer Responsibility) (Tobacco Filters Containing Plastic) Regulations 2022 and the EU Single Use Plastics Directive (2019/904) in Ireland.

TPPFG received approval from the Minister of the Climate, Energy and the Environment (MCEE) on 23rd December 2022 to operate as a compliance scheme for the sector. Under the Regulations (SI 609 of 2022), a producer shall not place a relevant product on the market in Ireland unless he or she is a member of an approved body. While it is possible for a competing body to seek approval, there is only one approved body at this point in time.

TPPFG's membership includes producers and importers of tobacco product filters containing plastic and plastic-containing filters marketed for use in combination with tobacco products that are placed on the market in the Republic of Ireland.

TPPFG members cover the cost of the clean-up, transport and treatment of these products that are disposed of in public spaces.

2025 was the second year in which our members contributed funds (in respect of the calendar year 2024) to the Department of Climate, Energy (DCEE) and the Environment in respect of the cost of clean-up, disposal and treatment of tobacco filters containing plastic and plastic filters marketed for use in combination with tobacco products which were placed on the market by our members. Funds contributed during 2025 were in respect of costs incurred during 2024.

TPPFG took steps in pursuance of the Scheme in respect of maintaining the existing 11 members and we continue to seek any producers who fall under the obligations of the regulations. The members were Bullbrand, Fitzpatrick Wholesale, Imperial Brands, JTI Ireland, O'Reilly Wholesale, Philip Morris, BAT Ireland (PJ Carroll & Company), Republic Technologies (UK) Limited, S&W Wholesale, Skins N Things and TDL Distributors

The Scheme is open to all producers, or their nominated representatives, who place tobacco filter products containing plastic on the Irish market. TPPFG shall recoup from individual producers the following costs as referred to in Regulation 13(5) and 13(6) of the Regulations for payment to the Minister:

- a) The cost of awareness-raising measures,
- b) The costs of cleaning up litter and the subsequent transport and treatment of that waste,
- c) The costs of data gathering and reporting,
- d) The cost of waste collection for relevant products that are discarded in public collection systems, including the infrastructure and its operation and subsequent transport and treatment of that waste. The cost of infrastructure may include the setting up of specific infrastructure for waste collection, including waste receptacles in common litter hotspots.

TPPFG is led and controlled by a Board of non-executive directors, consisting of representatives from the tobacco sector and independents. The chairperson for 2025 was Independent Director Michael O'Reilly. Our Board collectively ensure delivery of the objectives, set strategic direction, and uphold best corporate governance.

**Visit our website for more details [www.tppfg.ie](http://www.tppfg.ie)**



# Governance

TPPFG is committed to ensuring that it adheres to the highest standards of corporate governance. Corporate governance policies are reviewed regularly.

In 2023, the board of directors adopted the Department of Climate, Energy and the Environment’s *Code of Good Corporate Governance for Compliance Schemes*. TPPFG established a director’s handbook, which outlined all the directors’ obligations to ensure that good corporate governance practices are in place within TPPFG.

TPPFG monitored its strategic plan for the period 2023-2027, in accordance with Section 3.5 of the *Code of Good Corporate Governance for Compliance Schemes*. The plan is designed to ensure that the key conditions of the scheme’s five-year approval, which was issued by the Minister for Climate, Energy and the Environment (MCEE), are fully met.

A Risk Register has been prepared and is regularly reviewed in accordance with the scheme.

The auditors during 2025 were Clinton Higgins Ltd, and the solicitors were O’Shea Barry Solicitors.

## Board Member and Attendance

Board Members	Affiliation	Meeting Attendance
Deirdre Healy	Imperial Brands	5/5
Elisha Collier O'Brien*	JTI Ireland	4/4
Michael O'Reilly	Independent	5/5
Liam Moloney	Independent	5/5
Rosalind O’Sullivan	British American Tobacco (P.J. Carroll & Co)	5/5
Rob Fox	TDL Distributors Ltd t/a Ampersand	5/5
Victoria Hancock	Philip Morris	5/5

\*Resigned 31 October 2025.

Daan Van Hamersveld (JTI) was appointed as a director on 27 November 2025.

The Board is open, responsive, and accountable to its users, beneficiaries, members, and others with an interest in its work.

## Board Committees

There are internal committees on nomination, remuneration, and audit and finance, not only to safeguard TPPFG' activities and reputation, but also to recognise achievements. Committees' attendance by members are outlined in the table below:

Board Members	Affiliation	Meeting Attendance
<b>Nomination Committee</b>		
Rob Fox	TDL Distributors Ltd t/a Ampersand	1/1
Elisha Collier O'Brien	JTI Ireland	0/1
Liam Moloney	Independent	1/1
<b>Remuneration Committee</b>		
Deirdre Healy	Imperial Brands	1/1
Victoria Hancock	Philip Morris	1/1
Rosalind O'Sullivan	British American Tobacco (P.J. Carroll & Co)	1/1
<b>Audit and Finance Committee</b>		
Michael O'Reilly	Independent	2/2
Liam Moloney	Independent	2/2
Elisha Collier O'Brien	JTI Ireland	0/1

### Audit and Finance Committee

The Audit and Finance Committee review financial performance, internal controls and both internal and external reporting processes. It also meets with the TPPFG statutory auditors and tax advisors. This committee meet as required, but not less than once per year. Members of the committee at the outset of 2025 were Michael O'Reilly, Elisha Collier O'Brien and Liam Maloney. Elisha Collier O'Brien resigned (31 October 2025) and was replaced by Daan Van Hamersveld (22 January 2026).

### Remuneration Committee

The Remuneration Committee advises the Board on the remuneration of the General Manager and Independent Directors as well as any other members of the Scheme it is designated to consider. Neither the Scheme General Manager nor the Independent Directors are a member of this committee. The Remuneration Committee meets as required, but not less than once per year. Members of the committee are Deirdre Healy, Rosalind Sullivan and Victoria Hancock.

### Nomination Committee

The Nomination Committee is responsible for evaluating the Director requirements for the TPPFG Board including rotation of Directors, identifying new skill sets for Directors and championing all appointments to the Board. The committee meets as required, but not less than once per year. Members of the committee at the outset of 2025 were Liam Maloney, Rob Fox, Elisha Collier O'Brien resigned (31 October 2025) and was replaced by Daan Van Hamersveld (22 January 2026).

# The Market and Supporting Anti-Littering Measures

TPPFG collected data from its members on the number/weight of tobacco filters placed on the market in 2022, 2023, 2024 and 2025. Clinton Higgins Accountants audited two members on their 2024 data submitted and found the information provided was satisfactory. The process of auditing the 2025 data has recently started.

The table below outlines the weight of filters placed on the market by TPPFG members.

The table below shows that weight<sup>1</sup> of filters placed on the market is decreasing each year in line with Government policy to reduce smoking as outlined in policy - Tobacco Free Ireland.

Year	Tonnes of Filters
2022	608
2023	580
2024	530
2025	499*

*\*Provisional data, subject to change*

A litter composition study was carried out on behalf of DECC in 2024 to determine the types and volume of SUP waste found in street sweeping litter. The study was

carried out by Fehily Timoney and the methodology for this study was agreed with the Environment Protection Agency (EPA) in advance. The percentage of tobacco filter litter found in total litter from public street cleaning and bins is 0.419% by weight. Using this data the EPA estimates there was 263.9 tonnes of tobacco filters collected in 2024 via street cleaning activities.

TPPFG collects data from its members on the amount of filters containing plastic which are placed on the market. Based on this data, each member’s market share is determined, and the members then contribute funds to TPPFG based on their market share. The funds collected are then transferred to DCEE, where they are ring-fenced for future litter clean-up activities.

<sup>1</sup>An average weight of 0.2g per filter was applied to convert to tonnes.

European Commission (2021) study to support the development of implementing acts and guidance under the Directive on the reduction of the impact of certain plastic products on the environment. WP 6 final report on developing guidelines on litter clean-up costs: The report states “According to two recent field evaluation studies carried out by the tobacco industry in 2019 and 2020, the average weight of total public post consumption tobacco filter waste is approximately 0.203g per filter”  
 Enotiko (2019) Mission Mégots Agir ensemble contre les mégots dans l’espace public. Available at: [http://enotiko.fr/mmpdf/Mission\\_Megots-Evaluation\\_du\\_gisement\\_.pdf](http://enotiko.fr/mmpdf/Mission_Megots-Evaluation_du_gisement_.pdf) and Optae (2019) Évaluation du gisement de mégots jetés dans l’espace public.

Philip Morris International (2020). EU Single-Use Plastics Directive Extended Producer Responsibility: Country-specific EPR cost model.

## Enforcement

In general, anyone who supplies tobacco filters containing plastic to the Irish market has legal obligations under Single Use Plastics legislation. The regulations use the term 'producer'. A 'producer' is essentially any person who places tobacco filters containing plastic on the market in Ireland for the first time (this includes online sales).

The Environmental Protection Agency (EPA) is responsible for enforcing the legal obligations that apply to producers under the tobacco filters containing plastic legislation and will pursue those who are not meeting their obligations. Enforcement notices will be issued to non-compliant producers. Non-compliance may lead to legal action up to and including prosecution. More information on EPA enforcement can be found at: <https://www.epa.ie/our-services/compliance--enforcement/waste/single-use-plastics/>

TPPFG supports the efforts of the Environmental Protection Agency (EPA) in the implementation of enforcement requirements of the Regulations by providing a list of registered producers and any intelligence of potential producers. In 2025, there was a focus on enforcement of producers using online platforms.

## Awareness Raising, Training and Communications

TPPFG operated a programme of membership awareness raising activities among stakeholders.

This involved maintaining a website [www.tppfg.ie](http://www.tppfg.ie) and the production of a newsletter for its members and an annual report.



## Membership Interaction

During 2025, TPPFG issued a newsletter to its members to inform them of the latest developments in TPPFG.

In May the third TPPFG annual general meeting was held online.

During the year, members were emailed directly with any key relevant updates on issues relevant to their business.

## Stakeholder Engagement

During 2025, under its approval to operate the scheme, TPPFG met with the Department of Climate, Energy and the Environment on five occasions in order to provide progress updates on the performance of the Scheme and other matters arising.

TPPFG is in regular communication with the EPA on the enforcement of the regulations.

### **Annual Producer Contributions under Single Use Plastic Directive**

A new methodology for calculating annual producer contributions under Single Use Plastic Directive in respect of litter and street bin waste was formulated by a Litter Working Group (LWG), comprising representatives of this Department and the relevant EPR schemes.

A document outlining this methodology, along with minutes of meetings of the LWG from November 2025 can be found on this webpage:

<https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/single-use-plastics/>

This new methodology will be used during 2026 in respect of calculating contributions due for 2025, and will continue to be used each year thereafter.

## Co-operation

Nationally, TPPFG has engaged with the other Extended Producer Responsibility schemes in Ireland, particularly Repak on the litter bin composition survey in 2024.

TPPFG regularly liaised with the ELVES and Irish Farm Film Plastics compliance schemes. TPPFG is very grateful for their cooperation, assistance, and advice.

TPPFG will share with the EPA 2025 data on the total weight of tobacco filters containing plastic placed on the market as part of the SUP reporting requirement.

### **Waste Characterisation Study**

A new waste characterisation study is to be commissioned in 2026 by Repak on behalf of all the SUP product related PROs (REPAK, Re-Turn and TPPFG). This study is to analyse both street litter and waste discarded in public collection systems, i.e. street bins provided and maintained by Local Authorities. It is anticipated that further such studies will then take place every three to five years thereafter.



## Outlook for 2026

### Business

The key scheme objectives for the coming year have been identified as follows:

1. Comply with SI 609 of 2022 for tobacco filter producers supplying on to the Irish market.
2. Ensure that producer members provide funding, based on their market volumes that cover the TPPFG's operating cost and the following costs:
  - a) The cost of awareness raising measures,
  - b) The costs of cleaning up litter and the subsequent transport and treatment of that waste
  - c) The costs of data gathering and reporting
  - d) The cost of waste collection for relevant products that are discarded in public collection systems, including the infrastructure and its operation and subsequent transport and treatment of that waste. The cost of infrastructure may include the setting up of specific infrastructure for waste collection, including waste receptacles in common litter hotspots.
  - e) The cost of building up and maintaining an appropriate contingency reserve.
3. Support awareness raising efforts to encourage the responsible disposal of tobacco filters in public places.
4. Adhere to highest standard of corporate governance.
5. Ensure accurate and verifiable reporting of relevant data.
6. Ensure appropriate Membership interaction.

### Financial

TPPFG recoups from its individual members the costs as referred to in Regulation 13(5) and 13(6) of the Regulations for payment to the Minister. 2025 will be the second full year that the members covered the full costs under the regulations. Costs are paid annually in arrears.

## Finance

The Financial Statements for the year ended 31st December 2025 were approved by the Board on the 15th of April 2026.

The surplus/(deficit) for the financial year after providing for taxation amounted to €7,607 (2023 - € 19,468). At the end of the financial year, the company has Net Assets of €186,087 (2024 - €133,480). The management fee for 2025 was €53,330.

### Contingency Reserve Fund

A Contingency Reserve Fund (the Fund) is to ensure the availability of sufficient resources for the continued delivery of the Scheme in the event of notice to revoke approval by the Minister. The Fund is ring-fenced and held by TPPFG in trust for its members. TPPFG is not permitted to access the Fund to support its day-to-day operations. The Fund can be accessed by TPPFG in exceptional circumstances only and with the agreement of the Minister. It has not been accessed for any reason. This Fund was built up in 2025 to €90,000 and it remains at this level. This is in line with Point 9 of TPPFG's approval to operate, which states the Fund shall reach €90,000 as per the timeline set out in the application, to be sufficient to cover the direct operating costs of TPPFG for a period of six months.

The Audited Financial Statements for the year are set out in Appendix A:

### Cost Control

TPPFG takes care when hiring external contractors and seeks at least three quotations for significant services required. This ensure the best possible price is obtained. TPPFG regularly reviews contractors to ensure cost are competitive and keeps its administration costs to a minimum. During 2024, members contributed €424,720 for the TPPFG's operations. This covered the cost for running the company, the cost of waste treatment, the cost of data gathering, the cost of public awareness raising measures and a contribution to the contingency fund.

**Tobacco Product Plastic Filter Group Company Limited  
by Guarantee  
Abridged Financial Statements  
for the financial year ended 31 December 2025**



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## **Tobacco Product Plastic Filter Group Company Limited by Guarantee DIRECTORS' RESPONSIBILITIES STATEMENT**

for the financial year ended 31 December 2025

The directors are responsible for preparing the Directors' Report and the financial statements in accordance with applicable Irish law and regulations.

Irish company law requires the directors to prepare financial statements for each financial year. Under that law, the directors have elected to prepare the financial statements in accordance with the Companies Act 2014 and FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland", applying Section 1A of that Standard, issued by the Financial Reporting Council. Under company law, the directors must not approve the financial statements unless they are satisfied that they give a true and fair view of the assets, liabilities and financial position of the company as at the financial year end date and of the surplus or deficit of the company for the financial year and otherwise comply with the Companies Act 2014.

In preparing these financial statements, the directors are required to:

- select suitable accounting policies for the company financial statements and then apply them consistently;
- make judgements and accounting estimates that are reasonable and prudent;
- state whether the financial statements have been prepared in accordance with applicable accounting standards, identify those standards, and note the effect and the reasons for any material departure from those standards; and
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the company will continue in business.

The directors are responsible for ensuring that the company keeps or causes to be kept adequate accounting records which correctly explain and record the transactions of the company, enable at any time the assets, liabilities, financial position and surplus or deficit of the company to be determined with reasonable accuracy, enable them to ensure that the financial statements and Directors' Report comply with the Companies Act 2014 and enable the financial statements to be readily and properly audited. They are also responsible for safeguarding the assets of the company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

### **Signed on behalf of the board**

**Michael O'Reilly**  
Director

**15 April 2026**

**Liam Moloney**  
Director

**15 April 2026**

# INDEPENDENT AUDITOR'S SPECIAL REPORT TO THE DIRECTORS OF TOBACCO PRODUCT PLASTIC FILTER GROUP COMPANY LIMITED BY GUARANTEE

## pursuant to section 356(1) and 356(2) of the Companies Act 2014

### Opinion

In our opinion the directors are entitled under section 352 of the Companies Act 2014 to annex the abridged financial statements to the annual return of Tobacco Product Plastic Filter Group Company Limited by Guarantee ('the company') and those abridged financial statements have been properly prepared pursuant to the provisions of section 353 of that Act (exemptions available to small companies).

### Basis of opinion

We have examined :

- (i) the abridged financial statements for the financial year ended 31 December 2025 on pages 8 to 13 which the directors of Tobacco Product Plastic Filter Group Company Limited by Guarantee propose to annex to the annual return of the company; and
- (ii) the financial statements to be laid before the Annual General Meeting, which form the basis for those abridged financial statements.

The scope of our work for the purpose of this report was limited to confirming that the directors are entitled to annex abridged financial statements to the annual return and that those abridged financial statements have been properly prepared, pursuant to section 353 of the Companies Act 2014, from the financial statements to be laid before the Annual General Meeting.

### Respective responsibilities of directors and auditors

It is your responsibility to prepare abridged financial statements which comply with section 352 of the Companies Act 2014. It is our responsibility to form an independent opinion that the directors are entitled under section 352 of the Companies Act 2014 to annex abridged financial statements to the annual return of the company and that those abridged financial statements have been properly prepared pursuant to sections 352 and 353 of that Act and to report our opinion to you.

This report is made solely to the company's directors, as a body, in accordance with section 356(2) of the Companies Act 2014. Our work has been undertaken so that we might state to the directors those matters we are required to state to them in our report under section 356(2) of the Companies Act 2014 and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the directors for our work, for this report, or for the opinions we have formed.

### Other Information required by the Companies Act 2014

On 15 April 2026 we reported to the members on the company's financial statements for the financial year ended 31 December 2025 and our report was as follows:

#### "Report on the audit of the financial statements"

### Opinion

We have audited the financial statements of Tobacco Product Plastic Filter Group Company Limited by Guarantee ('the company') for the financial year ended 31 December 2025 which comprise the Income and Expenditure Account, the Balance Sheet, the Reconciliation of Members' Funds and the related notes to the financial statements, including the summary of significant accounting policies set out in note 2. The financial reporting framework that has been applied in their preparation is Irish Law and FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland", issued in the United Kingdom by the Financial Reporting Council, applying Section 1A of that Standard.

In our opinion the financial statements:

- give a true and fair view of the assets, liabilities and financial position of the company as at 31 December 2025 and of its surplus for the financial year then ended;
- have been properly prepared in accordance with FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland", applying Section 1A of that Standard; and
- have been properly prepared in accordance with the requirements of the Companies Act 2014.

### Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (Ireland) (ISAs (Ireland)) and applicable law. Our responsibilities under those standards are described below in the Auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the company in accordance with the ethical requirements that are relevant to our audit of financial statements in Ireland, including the Ethical Standard for Auditors (Ireland) issued by the Irish Auditing and Accounting Supervisory Authority (IAASA), and the Provisions Available for Audits of Small Entities, in the circumstances set out in note 3 to the financial statements, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

# INDEPENDENT AUDITOR'S SPECIAL REPORT TO THE DIRECTORS OF TOBACCO PRODUCT PLASTIC FILTER GROUP COMPANY LIMITED BY GUARANTEE

## pursuant to section 356(1) and 356(2) of the Companies Act 2014

### Conclusions relating to going concern

In auditing the financial statements, we have concluded that the directors' use of the going concern basis of accounting in the preparation of the financial statements is appropriate. Our evaluation of the director's assessment of the company's ability to continue to adopt the going concern basis of accounting included considering the inherent risks to the company's business model and analysing how those risks might affect the company's financial resources or ability to continue operations over the going concern period.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the company's ability to continue as a going concern for a period of at least twelve months from the date when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the directors with respect to going concern are described in the relevant sections of this report.

### Other Information

The directors are responsible for the other information. The other information comprises the information included in the annual report other than the financial statements and our Auditor's Report thereon. Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the course of the audit, or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether there is a material misstatement in the financial statements or a material misstatement of the other information. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

### Opinions on other matters prescribed by the Companies Act 2014

In our opinion, based on the work undertaken in the course of the audit, we report that:

- the information given in the Directors' Report for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- the Directors' Report has been prepared in accordance with applicable legal requirements.

We have obtained all the information and explanations which, to the best of our knowledge and belief, are necessary for the purposes of our audit.

In our opinion the accounting records of the company were sufficient to permit the financial statements to be readily and properly audited and the financial statements are in agreement with the accounting records.

### Matters on which we are required to report by exception

Based on the knowledge and understanding of the company and its environment obtained in the course of the audit, we have not identified any material misstatements in the directors' report.

The Companies Act 2014 requires us to report to you if, in our opinion, the requirements of any of sections 305 to 312 of the Act, which relate to disclosures of directors' remuneration and transactions are not complied with by the Company. We have nothing to report in this regard.

### Respective responsibilities

#### Responsibilities of directors for the financial statements

As explained more fully in the Directors' Responsibilities Statement set out on page 3, the directors are responsible for the preparation of the financial statements in accordance with the applicable financial reporting framework that give a true and fair view, and for such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the directors are responsible for assessing the company's ability to continue as a going concern, disclosing, if applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the company or to cease operation, or has no realistic alternative but to do so.



## **INDEPENDENT AUDITOR'S SPECIAL REPORT TO THE DIRECTORS OF TOBACCO PRODUCT PLASTIC FILTER GROUP COMPANY LIMITED BY GUARANTEE pursuant to section 356(1) and 356(2) of the Companies Act 2014**

### **Auditor's responsibilities for the audit of the financial statements**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an Auditor's Report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (Ireland) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A further description of our responsibilities for the audit of the financial statements is contained in the appendix to this report, located at page 7, which is to be read as an integral part of our report.

### **The purpose of our audit work and to whom we owe our responsibilities**

Our report is made solely to the company's members, as a body, in accordance with section 391 of the Companies Act 2014. Our audit work has been undertaken so that we might state to the company's members those matters we are required to state to them in an Auditor's Report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume any responsibility to anyone other than the company and the company's members, as a body, for our audit work, for this report, or for the opinions we have formed."

### **Eoin Walsh for and on behalf of CLINTON HIGGINS**

Chartered Accountants and Statutory Audit Firm  
Trident House  
Dublin Road  
Naas  
Co. Kildare

**15 April 2026**

We certify that the auditor's report on pages 4 - 6 made pursuant to section 356(1) of the Companies Act 2014 is a true copy of the original.

**Percy Foster  
Secretary**

**15 April 2026**

**Michael O'Reilly  
Director**

**15 April 2026**



## **Tobacco Product Plastic Filter Group Company Limited by Guarantee APPENDIX TO THE INDEPENDENT AUDITOR'S REPORT**

### **Further information regarding the scope of our responsibilities as auditor**

As part of an audit in accordance with ISAs (Ireland), we exercise professional judgement and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the company's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the directors.
- Conclude on the appropriateness of the directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our Auditor's Report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our Auditor's Report. However, future events or conditions may cause the company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.



## Tobacco Product Plastic Filter Group Company Limited by Guarantee BALANCE SHEET

as at 31 December 2025

	Notes	2025 €	2024 €
<b>Current Assets</b>			
Debtors	5	15,877	21,269
Cash and cash equivalents		196,262	151,917
		<u>212,139</u>	<u>173,186</u>
<b>Creditors: amounts falling due within one year</b>	6	<u>(26,052)</u>	<u>(39,706)</u>
<b>Net Current Assets</b>		<u>186,087</u>	<u>133,480</u>
<b>Total Assets less Current Liabilities</b>		<u>186,087</u>	<u>133,480</u>
<b>Provisions for liabilities</b>	7	<u>(125,000)</u>	<u>(80,000)</u>
<b>Net Assets</b>		<u><u>61,087</u></u>	<u><u>53,480</u></u>
<b>Reserves</b>			
Capital reserves and funds	9	26,666	26,666
Income and expenditure account		34,421	26,814
<b>Members' Funds</b>		<u><u>61,087</u></u>	<u><u>53,480</u></u>

The financial statements have been prepared in accordance with the provisions applicable to companies subject to the small companies' regime and in accordance with FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland", applying Section 1A of that Standard.

We as Directors of Tobacco Product Plastic Filter Group Company Limited by Guarantee, state that -  
The company has relied on the specified exemption contained in section 352 Companies Act 2014. The company has done so on the grounds that it is entitled to the benefit of that exemption as a small company and confirm that the abridged financial statements have been properly prepared in accordance with section 353 Companies Act 2014 and the small companies' regime.

Approved by the board on 15 April 2026 and signed on its behalf by:

**Michael O'Reilly**  
Director

**Liam Moloney**  
Director



## Tobacco Product Plastic Filter Group Company Limited by Guarantee RECONCILIATION OF MEMBERS' FUNDS

as at 31 December 2025

	Retained surplus €	Capital contribution reserve €	Total €
<b>At 1 January 2024</b>	7,346	26,666	34,012
Surplus for the financial year	19,468	-	19,468
<b>At 31 December 2024</b>	26,814	26,666	53,480
Surplus for the financial year	7,607	-	7,607
<b>At 31 December 2025</b>	<b>34,421</b>	<b>26,666</b>	<b>61,087</b>

# Tobacco Product Plastic Filter Group Company Limited by Guarantee

## NOTES TO THE ABRIDGED FINANCIAL STATEMENTS

for the financial year ended 31 December 2025

### 1. General Information

Tobacco Product Plastic Filter Group Company Limited by Guarantee is a company limited by guarantee incorporated and registered in Ireland. The registered number of the company is 721089. The registered office of the company is C/o Clinton Higgins, Trident House, Dublin Road, Naas, Co. Kildare. The principal activity of the company is to comply with the conditions in Statutory Instrument 609 of 2022, by the provision of an extended producer responsibility scheme that covers the cost of clean-up, transport and disposal of tobacco product filters containing plastic, and filters containing plastic marketed for use in combination with tobacco products placed on the Irish market, and disposed of in public spaces within the Republic of Ireland and to carry out any and all other associated activities. The financial statements have been presented in Euro (€) which is also the functional currency of the company.

### 2. Summary of Significant Accounting Policies

The following accounting policies have been applied consistently in dealing with items which are considered material in relation to the company's financial statements.

#### Statement of compliance

The financial statements of the company for the financial year ended 31 December 2025 have been prepared in accordance with the provisions of FRS 102 Section 1A (Small Entities) and the Companies Act 2014.

#### Basis of preparation

The financial statements have been prepared on the going concern basis and in accordance with the historical cost convention as explained in the accounting policies below. Historical cost is generally based on the fair value of the consideration given in exchange for assets. The financial reporting framework that has been applied in their preparation is the Companies Act 2014 and FRS 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland" Section 1A, issued by the Financial Reporting Council.

The company qualifies as a small company as defined by section 280A of the Companies Act 2014 in respect of the financial year, and has applied the rules of the 'Small Companies Regime' in accordance with section 280C of the Companies Act 2014 and Section 1A of FRS 102.

#### Income

Income arises from the contributions charged to members of the scheme in the calendar year on an accruals basis.

#### Direct Costs

Direct Costs to comply with the conditions in Statutory Instrument 609 of 2022 are recognised on an accruals basis and include costs associated with waste treatment, awareness measures, data gathering and the contingency fund.

#### Trade and other debtors

Trade and other debtors are initially recognised at fair value and thereafter stated at amortised cost using the effective interest method less impairment losses for bad and doubtful debts except where the effect of discounting would be immaterial. In such cases the receivables are stated at cost less impairment losses for bad and doubtful debts.

#### Cash and cash equivalents

Cash and cash equivalents comprise cash at bank and in hand.

#### Borrowing costs

Borrowing costs relating to the acquisition of assets are capitalised at the appropriate rate by adding them to the cost of assets being acquired. Investment income earned on the temporary investment of specific borrowings pending their expenditure on the assets is deducted from the borrowing costs eligible for capitalisation. All other borrowing costs are recognised in profit or loss in the period in which they are incurred.

#### Provisions

Provisions are recognised when the company has a present legal or constructive obligation arising as a result of a past event, it is probable that an outflow of economic benefits will be required to settle the obligation and a reliable estimate can be made. Provisions are measured at the present value of the expenditures expected to be required to settle the obligation using a pre-tax rate that reflects current market assessments of the same value of money and the risks specific to the obligation. The increase in the provision due to passage of time is recognised as interest expense.

continued

## Tobacco Product Plastic Filter Group Company Limited by Guarantee NOTES TO THE ABRIDGED FINANCIAL STATEMENTS

for the financial year ended 31 December 2025

### Trade and other creditors

Trade and other creditors are initially recognised at fair value and thereafter stated at amortised cost using the effective interest rate method, unless the effect of discounting would be immaterial, in which case they are stated at cost.

### Taxation and deferred taxation

Current tax represents the amount expected to be paid or recovered in respect of taxable income for the financial year and is calculated using the tax rates and laws that have been enacted or substantially enacted at the Balance Sheet date.

Deferred tax is recognised in respect of all timing differences that have originated but not reversed at the balance sheet date where transactions or events have occurred at that date that will result in an obligation to pay more tax in the future, or a right to pay less tax in the future. Timing differences are temporary differences between the company's taxable income and its results as stated in the financial statements.

Deferred tax is measured on an undiscounted basis at the tax rates that are anticipated to apply in the periods in which the timing differences are expected to reverse, based on tax rates and laws that have been enacted or substantively enacted by the Balance Sheet date.

### Foreign currencies

Monetary assets and liabilities denominated in foreign currencies are translated at the rates of exchange ruling at the Balance Sheet date. Non-monetary items that are measured in terms of historical cost in a foreign currency are translated at the rates of exchange ruling at the date of the transaction. Non-monetary items that are measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value was determined. The resulting exchange differences are dealt with in the Income and Expenditure Account.

### 3. Provisions Available for Audits of Small Entities

In common with many other businesses of our size and nature, we use our auditors to prepare and submit tax returns to the Revenue and to assist with the preparation of the financial statements.

### 4. Employees

The average monthly number of employees, including directors, during the financial year was 2, (2024 - 2).

### 5. Debtors

	2025	2024
	€	€
Trade debtors	-	2,657
Deferred tax asset	4,375	4,375
Taxation	9,790	14,237
Prepayments	1,712	-
	<u>15,877</u>	<u>21,269</u>

Taxation is repayable in accordance with statutory provisions.

### 6. Creditors

	2025	2024
	€	€
<b>Amounts falling due within one year</b>		
Amounts owed to credit institutions	450	984
Trade creditors	-	11,041
Taxation	5,432	12,456
Other creditors	-	4,795
Accruals	20,170	10,430
	<u>26,052</u>	<u>39,706</u>

Trade creditors and accruals are payable in accordance with standard commercial credit terms.

Taxation is payable in accordance with statutory provisions.



continued

## Tobacco Product Plastic Filter Group Company Limited by Guarantee NOTES TO THE ABRIDGED FINANCIAL STATEMENTS

for the financial year ended 31 December 2025

### 7. Provisions for liabilities

The amounts provided for liabilities are analysed below:

	Direct Cost Reserves	Total	Total
	€	2025 €	2024 €
At financial year start	80,000	<b>80,000</b>	-
Charged to income and expenditure	45,000	<b>45,000</b>	80,000
At financial year end	<b>125,000</b>	<b>125,000</b>	80,000

Direct Cost Reserves include €90,000 (2024: €45,000) for Contingency Reserve Fund and €35,000 for Data Gathering.

In accordance with the approval granted by the Department of Climate, Energy and the Environment on 23 December 2022, the company was required to build up a contingency reserve fund ("the Fund") to ensure the availability to the Department of sufficient resources for the continued delivery of the scheme in the event of failure. The Fund must be built up to €90,000. The directors have set aside €90,000 for the Fund as of 31 December 2025.

Members contributed €35,000 during 2024 for the purposes of Data Gathering. These monies were not spent at the year end. The directors have set aside a specific reserve of €35,000 for the purposes of future costs associated with Data Gathering.

### 8. Status

The liability of the members is limited.

Every member of the company undertakes to contribute to the assets of the company in the event of its being wound up while they are members, or within one financial year thereafter, for the payment of the debts and liabilities of the company contracted before they ceased to be members, and of the costs, charges and expenses of winding up, and for the adjustment of the rights of the contributors among themselves, such amount as may be required, not exceeding € 1.

### 9. Reserves

	Income and expenditure account €	Capital contribution reserve €	Total €
At 1 January 2025	26,814	26,666	53,480
Surplus for the financial year	7,607	-	7,607
Capital contribution	-	-	-
At 31 December 2025	<b>34,421</b>	<b>26,666</b>	<b>61,087</b>



#### 10. Capital commitments

The company had no material capital commitments at the financial year-ended 31 December 2025.

11. Directors' remuneration	2025 €	2024 €
Fees	-	8,900
Remuneration	36,905	27,150
	<u>36,905</u>	<u>36,050</u>

## Tobacco Product Plastic Filter Group Company Limited by Guarantee NOTES TO THE ABRIDGED FINANCIAL STATEMENTS

for the financial year ended 31 December 2025

#### 12. Related party transactions

Certain directors of the company are also employees of entities that are members of the compliance scheme operated by the company. During the year, the company entered into transactions with these member entities in the ordinary course of business in respect of scheme participation fees.

Details of the amounts involved have not been disclosed as the transactions are considered to be on normal commercial terms and disclosure of such amounts would be seriously prejudicial to the interests of the member entities due to their commercially sensitive nature.

#### 13. Post-Balance Sheet Events

As part of the company's authorisation, the Department of Climate, Energy and the Environment will conduct a mid-term review of the compliance scheme, which is scheduled to take place in Quarter 2 2026.

#### 14. Approval of financial statements

The financial statements were approved and authorised for issue by the board of directors on 15 April 2026.



## **INDEPENDENT AUDITOR'S REPORT TO THE DIRECTORS of Tobacco Product Plastic Filter Group Company Limited by Guarantee pursuant to section 356(2) of the Companies Act 2014**

'We have examined:

- (i) the abridged financial statements for the financial year ended 31 December 2025 on pages 8 to 13 which the directors of Tobacco Product Plastic Filter Group Company Limited by Guarantee propose to annex to the annual return of the company; and
- (ii) the financial statements to be laid before the Annual General Meeting, which form the basis for those abridged financial statements.'

This report is made solely to the company's directors, as a body, in accordance with section 356(2) of the Companies Act 2014. Our work has been undertaken so that we might state to the directors those matters we are required to state to them in our report under section 356(2) of the Companies Act 2014 and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the directors for our work, for this report, or for the opinions we have formed.

### **Respective responsibilities of directors and auditors**

It is your responsibility to prepare abridged financial statements which comply with the section 352 of the Companies Act 2014. It is our responsibility to form an independent opinion that the directors are entitled under section 352 of the Companies Act 2014 to annex abridged financial statements to the annual return of the company and that those abridged financial statements have been properly prepared pursuant to sections 352 and 353 of that Act and to report our opinion to you.

### **Basis of opinion**

We have carried out the procedures we consider necessary to confirm, by reference to the financial statements, that the company is entitled to annex abridged financial statements to the annual return of the company and that the abridged financial statements are properly prepared. The scope of our work for the purpose of this report does not include examining or dealing with events after the date of our report on the full financial statements.

### **Opinion**

In our opinion the directors are entitled under section 352 of the Companies Act 2014 to annex the abridged financial statements to the annual return of Tobacco Product Plastic Filter Group Company Limited by Guarantee ('the company') and those abridged financial statements have been properly prepared pursuant to the provisions of section 353 of that Act (exemptions available to small companies).

**Eoin Walsh**  
**for and on behalf of**  
**CLINTON HIGGINS**

Chartered Accountants and Statutory Audit Firm  
Trident House  
Dublin Road  
Naas  
Co. Kildare

**15 April 2026**

