



Department
of Health



Llywodraeth Cymru
Welsh Government



The Scottish
Government
Riaghaltas na h-Alba



Department of
**Health, Social Services
and Public Safety**
www.dhsspsni.gov.uk

Consultation on the introduction of regulations for standardised packaging of tobacco products – Response Form

a. Are you responding (required):

- As a member of the public (go to question b)
- As a health or social care professional (go to question b)
- On behalf of a business or as a sole trader (go to question c)
- On behalf of an organisation (go to question c)

b. Please provide your details and contact information:

Name of respondent (required)

Address of respondent (required):

Contact email address (required):

Now go to question f

c. Please provide your organisation's details and contact information:

Name of organisation (required):

Name of person providing submission (required):

Wendy Preston

Job Title (required):

Nurse Consultant

Contact address of organisation (required):

10 Hartley close,

Contact email address (required):

wendy.preston@geh.nhs.uk

Is this the official response of your organisation? (required):

Yes

No

d. If you are responding on behalf of a business, what type is it?

Tobacco retailer (supermarket)

Tobacco retailer (convenience store)

Tobacco retailer (other type of shop or business)

Specialist tobacconist

Duty free shop

- Wholesale tobacco seller
- Tobacco manufacturer
- Retailer not selling tobacco products
- Pharmaceutical industry
- Business involved in the design or manufacture of packaging
- Other (please provide details below)

If other, please tell us the type of business:

e. If you are responding on behalf of an organisation, what type is it?

- NHS organisation
- Health charity/NGO (working at national level)
- Local Authority
- Local Authority Trading Standards or Regulatory Services Department
- Local tobacco control alliance
- Retail representative organisation
- Industry representative organisation
- Other type of business representative organisation
- University or research organisation
- Other (please provide details below)

If other, please tell us the type of organisation:

f. Does your response relate to (required):

United Kingdom

England only

Scotland only

Wales only

Northern Ireland only

g. Do you, or the business or organisation you represent, have any direct or indirect links to, or receive funding from the tobacco industry? (required)

No

Yes (please describe below)

If yes, please describe:

h. If you do not wish your details to be identified in the summary report of consultation responses, please tick this box

Consultation questions

1. Do you have any observations about the report of the Chantler Review that you wish to bring to our attention?

We feel that the conclusions of Sir Cyril Chandler that it is 'highly likely that standardised packaging would serve to reduce the rate of children taking up smoking' must be acted upon and legislated. In the report the body of evidence shows that standardised packaging along with the current tobacco control regime will very likely lead to a modest but important reduction in the prevalence and uptake of tobacco. This will have a positive effect on Public Health of the nation. This is also backed up in a report by Professor David Hammond for the Iris department of health who concluded that the evidence on standardised packaging supports 1) a reduction in young adults and youth starting smoking 2) smoking cessation 3) abstinence for ex-smokers 4) denormalisation of tobacco use

2. Do you have any information, in particular any new or additional information since the 2012 consultation, relating to the wider aspects of standardised packaging that you wish to bring to our attention?

The introduction of standardisation of packaging needs to be part of a comprehensive strategy that includes a mass media campaign. The current Department of Health Tobacco Control Plan for England is until the end of 2015 and will need to be refreshed for the period 2016-2020 which will be the period when standardised packaging comes into effect. It will be important that this strategy capitalises on the opportunity and maximises the public health benefits. For example:

Funding for mass media

making stop smoking services mandatory

enforcing tobacco control

Tax rises over and above the escalator and reducing variation between products

introduce levies that can fund stop smoking services and contribute to health costs

There is no good data to support the theory that standardising packaging will increase illicit tobacco that has been part of the tobacco industries public relations campaign to prevent this policy (Rowell et al, 2014). Since the Australia launch of standardised packaging research in Victoria has found that there has been no increase in the availability of illicit tobacco (Scollo et al, 2014)

The research and outcomes from the Australian implementation of standardised packaging has in the main been positive. Young et al (2014) reported when the strategy was implemented in 2012 there was a sharp increase in smoking cessation referrals. Guillaumunier et al (2014) thematic analysis demonstrated smokers perception of quality and taste of cigarettes reduced after implementation. Zacher et

al (2014) supported the denormalisation argument with a reduction of smokers displaying their packets in public especially where children present.

Rowell, A., Evans-Reeves, K., Gilmore, A. (2014) Tobacco industry manipulation of data on and press coverage of the illicit tobacco trade in the UK: Tobacco Control
Scollo, M., Bayly, M., Wakefeild, M. (2014) Availability of illicit tobacco in small retail outlets before and after the implementation of Australian packaging legislation: Tobacco Control (April)

Guilaumier, A., Bonevski, B., Paul, C. (2014) Tobacco health warning messages on plain cigarette packs and in television campaigns: a qualitative study with Australian socioeconomically disadvantaged smokers: Health Education Research
Zacher, M et al (2014) Personal tobacco pack display before and after the introduction of plain packaging with large pictorial health warning in Australia: an observational study of outdoor cafe strips: Addiction 109: 653-663

3. Do you have any comments on the draft regulations, including anything you want to draw to our attention on the practicalities of implementing the regulations as drafted?

The draft regulations are welcomed by ARNS and we wish for these to be legislated with a few minor changes:

The regulations should apply for all tobacco products including cigars and cigarillos - failing to do this will give the impression these are less harmful.

When the regulation of electronic cigarettes is introduced this strategy should also be applied to products that are for recreational use (i.e. those not on a medicinal licence for smoking cessation).

Changing wording to 'must contain 20 cigarettes' which will learn the lesson from Australian legislation of prohibiting packs of less than 20. This has allowed promotion of adding extra cigarettes to packs (e.g. 20+1 free)

To prohibit misleading words in brand names, variants and descriptors.

4. Are you aware of any further evidence or information which would improve the assumptions or estimates we have made in the consultation-stage impact assessment?

We have over 1000 members who are respiratory nurse specialists and are part of the Smokefree Action Coalition which is supported by over 250 organisations. The consensus of medical professions is that standardised packaging will have a positive impact on public health and reduce harm. We feel it is important that this needs speedy legislation and must be done in this term of government.

Thank you for participating in this consultation.

The Department of Health and Devolved Administrations will only contact you should we seek further information about your response.

How to get involved in the consultation

The consultation will run for 6 weeks, from 26/06/14 to 07/08/14. Responses are invited from any interested group, company or person.

Respondents are encouraged to provide their views online, but responses can be made in any of the following ways:

Completing the online form on the Department of Health website at:

<http://consultations.dh.gov.uk/tobacco/standardised-packaging-of-tobacco-products-1>

- **Filling in the response form by downloading it at:**

<https://www.gov.uk/government/consultations>

- **Emailing your response to:**

TobaccoPackaging@dh.gsi.gov.uk

- **Posting your response to**

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