



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):

Ailsa Rutter

Job Title (required):

Director

Contact address of organisation (required):

Bede House, Belmont Business Park, Durham, DH1 1TW

Contact email address (required):

info@freshne.com

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?

1. Fresh is the North East of England's comprehensive tobacco control programme, commissioned by all 12 local authorities in the region. Fresh was the UK's first dedicated tobacco control office, set up to tackle the worst smoking rates in England which, in 2005, were 29% amongst the adult population. By 2012 this had dropped to 22%. Fresh works in partnership with the 12 local authority-led tobacco control alliances to deliver comprehensive activity at regional and local levels and to influence action nationally in order to support smokers to quit, prevent young people from starting to smoke and to protect people from tobacco-related harm. Fresh is also one of the lead partners in the national Tackling Illicit Tobacco for Better Health Partnership which aims to reduce the demand for and the supply of illicit tobacco as part of broader strategies to reduce tobacco use.

2. During the 2012 consultation on standardised tobacco packaging, 129 organisations in the region called for packs to be standardised, including all 12 local authorities.

3. We welcome the findings of the Chanter Review, particularly the impact that standardised tobacco packaging could have on uptake of smoking among young people

4. Smoking is the leading cause of health inequalities. The richest smokers die earlier than the poorest non-smokers as found in Gruer at al (1) who concluded that the scope for reducing health inequalities related to social position is limited unless many smokers in lower social positions stop smoking.

5. Tobacco use is the leading cause of premature death and preventable disease. In the North East, 5,500 deaths every year occur as a result of tobacco use.

6. Around 9,000 young people in the North East start to smoke every year and we need to do all we can to ensure that this number reduces to negligible levels. Repeated surveys of North East smokers have found the average age of trying cigarettes and starting to smoke to be 15.

7. We particularly welcome Chantler's dismissal of tobacco industry scaremongering about the alleged impact of standardised packaging on the illicit tobacco trade. Chantler is not convinced by the tobacco industry's argument that standardised packaging would increase the illicit market, especially in counterfeit cigarettes. Recent figures from Australia have also indicated that the illicit market has not increased since the introduction of the measure and that tobacco use is at an all-time low (2).

8. The ideal time to implement standardised packaging would be May 2016 at the same time as the EU Tobacco Products Directive, which includes updated larger health warnings and graphic warnings on the front of the packs. We consider that the case for standardised packaging has been made and that regulations should be laid before Parliament in advance of the 2015 General Election.

(1) <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2645845/>

(2) <http://www.health.gov.au/internet/main/publishing.nsf/Content/tobacco-kff>

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?

9. A considerable amount of new information on the potential effectiveness of standardised packaging since has emerged since the previous consultation in 2012.

10. Support for standardised packaging is at an all-time high with 69% of people in the North East in favour (3) and only 9% opposing. Nationally, public support is equally high, and perhaps surprisingly more smokers support standard packs (32%) than oppose (30%) with the remainder ambivalent or undecided. Our experience of talking to smokers on this issue suggests most smokers are very keen for their children not to start.

11. Further measures to regulate tobacco are popular with the public – only 12% of people in the North East think the government is doing too much to tackle smoking (4).

12. There is still a worrying lack of awareness about the impact that smoking has on health. Research gathered during the development of the 'Don't be the 1' campaign suggests that 90% of North East smokers underestimate the risk that smoking kills one in two of all long term smokers. When informed of the true risk 65% admitted they find the true risk (5) worrying and 43% said it is "very worrying."

13. 82% of smokers in the North East wish they had never started and 68% say they would like to be able to quit.

14. Fresh submitted the results of focus groups of smokers and non-smokers aged 18-24 during the original consultation, during which examples of Australian standardised packs were rated as likely to be most harmful and less attractive than current branded packs, with many young people feeling their greatest potential lay in dissuading young experimenters, occasional smokers and non-smokers (the stated aim of the policy rather than existing adult smokers). Discussions with young people since then has revealed further the potential impact standardised packs could have, including this film featuring two young female smokers from Gateshead, Tyne and

Wear comparing examples of Australian standardised packs with current branded cigarettes. Quotes from the young smokers included:

"It tells you... like more what it can actually do to you. They've [branded packs] just got like... little pictures on the back that you can't see when you're buying them."

"It'll probably make us want to quit smoking... like I'd probably try more than what I ever have" (6).

15. In Australia, research has shown that social norms in smoking behaviour are already beginning to change as a result of the implementation of standardised packaging. There has been a sharp rise in the number of calls to the Quitline New South Wales service (7) and that smokers are less willing to display their packs in public or to smoke in outdoor public places particularly where children are present (8).

16. Figures released by the Australian government in July have shown adult smoking rates have fallen significantly between 2010 and 2013 (9). In 2010 daily smoking prevalence amongst those aged 14 or older stood at 15.1% and has now fallen to 12.8%. The latest survey was conducted before the Australian Government's tobacco tax increases in December 2013, ruling out price as the primary reason for the dramatic fall in smoking during this 12-month period. Standardised packaging is the only major policy change over this time period and is therefore the most likely reason for the significant fall in smoking prevalence.

Tobacco industry opposition to standardised packaging - misusing data on illicit tobacco

17. The tobacco companies are spending considerable efforts in opposing any moves towards the introduction of standardised tobacco packaging. In the North East, JTI entered into a partnership arrangement with the Evening Chronicle newspaper (part of the Trinity Mirror media group) which featured three weeks' worth of JTI-funded advertising on illegal tobacco and published a series of articles generated by the company. Fresh was able to counter the misinformation provided by JTI and clearly outline that the illicit market is on a sustained long-term decline, that there is no evidence that standardised packaging would lead to an increase in the illicit trade and that all tobacco – legal or illegal – will kill one in two of its long term users.

18. The tobacco industry repeatedly claims that consumption of illicit tobacco will be increased by policies such as higher tax to reduce smoking and restricting tobacco promotion to reduce youth uptake, even though official figures show the illegal tobacco market has in fact decreased in the UK as a result of the introduction of such measures over a number of years. In November 2013 the chair of the Public Accounts Committee accused tobacco multinationals of deliberately oversupplying European markets, with the tobacco smuggled back into the UK. Committee Chair Margaret Hodge said:

“The supply of some brands of hand-rolling tobacco to some countries in 2011 exceeded legitimate demand by 240 per cent. HMRC must be more assertive with these manufactures. So far it has not fined a single one of them.”

19. The tobacco industry also claims that standardised tobacco packaging will be cheaper to counterfeit. In fact, the production costs of illicit cigarettes, including packaging, are very low, at around 20 US cents a pack (10). Counterfeiters are able to produce quality and apparently genuine packaging at low prices in a short time, therefore outside packaging is a very poor indicator of whether a pack of cigarettes is licit and illicit. Furthermore, if standardised packaging was introduced, enforcers would easily be able to identify counterfeit and smuggled branded packs and illicit white packs.

20. All security features on current packs will also be present on standardised packaging and additional international tracking and tracing mechanisms to tackle the illicit tobacco trade are required through Article 15 of the revised EU Tobacco Products Directive and Article 8 of the WHO FCTC Illicit Trade Protocol.

20a. Andrew Leggett, Deputy Director for Tobacco and Alcohol Strategy at HMRC has said "we're very doubtful that [standardised packaging] would have a material effect on [counterfeiting and the illicit trade in tobacco]." (10a) This conclusion was supported by the report of the Home Affairs Select Committee which concluded that "We believe that the decision on standardised packaging should be driven by health reasons... [if there was an increase in the illicit trade] we believe that the proper response would be a more vigorous effort on enforcement rather than any lessening in the Government's drive towards introducing standardised packaging." (10b)

21. A briefing from the Tackling Illicit Tobacco for Better Health Partnership on the tobacco industry and their tactics in using illegal tobacco arguments to oppose tobacco control measures can be found here: <http://www.illegal-tobacco.co.uk/wp-content/uploads/2014/03/Illegal-Tobacco-The-facts-about-the-Tobacco-Industry-V3-28-05-14.pdf>

22. HMRC estimates that in 2000 around 20% of cigarettes and 60% of hand-rolling tobacco (HRT) smoked in the UK were smuggled, costing over £3 billion a year in lost tax revenue (11). HMRC data suggests that by 2012/13 (the latest year for which this information is available) the illicit market in cigarettes had fallen to around 9% of the UK market, and in HRT to around 36% of the market with an associated revenue loss of £2 billion (midpoint) down from £3 billion in 2000 (12).

23. A report commissioned jointly by the four transnational tobacco companies (British American Tobacco, Imperial, JTI and Philip Morris International (13)) provides estimates on the scale and development of the illicit cigarette market in Europe and reports that consumption of counterfeit and contraband declined in the UK by 6.2% despite other industry data suggesting an increase.

24. The experience from England shows that comprehensive regional illicit tobacco programmes change the social norms around illicit tobacco, reducing the size of the illicit tobacco market, reducing the proportion of smokers buying illicit tobacco and increasing the public's likelihood to report intelligence. For example, in the North East between 2009 and 2013, following partnership development, three bursts of social marketing activity and enhanced intelligence and enforcement models:

- the proportion of smokers buying illicit tobacco had dropped from 24% to 17%
- the size of the illicit tobacco market had shrunk from 15% to 9%
- the proportion of smokers who buy illicit tobacco believing that 'everybody does it' shrunk from 45% to 28%
- the proportion of adults who are uncomfortable with the illicit tobacco trade rose from 57% to 70% (14).

25. A major Trading Standards survey in the North West of England has shown that fewer young children are accessing illicit tobacco products. Between 2011 and 2013 there were reductions in:

- the proportion of young people who have bought cigarettes from sellers such as neighbours, car boots and ice-cream vans from 42% to 27%
- the proportion of young people who have bought fake cigarettes, down from 28% to 22%
- the proportion of young smokers who have ever bought single cigarettes, from 67% to 49% (15).

Tobacco industry opposition to standardised packaging – misinformation from Australia

26. Further examples of misinformation include the release of misleading figures on tobacco consumption in Australia where standardised packs have been introduced. In November 2013, a study by the consultancy firm London Economics, funded by Philip Morris, reported that since the measure was introduced, there had been no significant change in smoking prevalence (16). However, the study used an online survey panel which was not representative of the general population and had a higher than average smoking prevalence, and the sample size used was not sufficient to determine statistically significant changes (17).

27. More recently, statistics from Australia were released in June 2014 claiming that cigarette sales had increased in Australia since the introduction of standardised packaging. A number of these articles appeared in one key newspaper in Australia that had opposed standardised packs, which then picked up coverage in national newspapers in England. However, figures from the Australian Bureau of Statistics (ABS) show that in March 2014 tobacco consumption in the country was the lowest ever recorded. Analysis in Australia suggests these statistics had been completely misreported in an attempt to discourage other Ministers in the UK from proceeding with standardised packaging (18). The recent figures released by the ABS show that total consumption of tobacco and cigarettes is currently the lowest ever recorded, dropping from \$3.508bn in December 2012 (when standard packs were introduced)

to \$3.405 billion in March 2014 (19). After population growth is taken into account tobacco sales per person have continued to decrease from 920.4 cigarettes in 2012 to 906.9 in 2013 (20). The Commonwealth Treasury has further advised that tobacco clearances (including excise and customs duty) fell by 3.4% in 2013 relative to 2012 when standardised packaging was introduced.

28. Tobacco retailers in the UK, often backed by tobacco-funded organisations, have suggested that the introduction of standardised packaging means that it will take longer to serve customers and that convenience stores will lose custom. However, research in Australia (21) has shown that “retailers quickly gained experience with the new legislation... The long retrieval times predicted by tobacco industry-funded retailer groups and the consequent costs they predicted would fall upon small retailers from plain packaging are unlikely to eventuate.”

28a. The government should resist efforts by the tobacco industry and its surrogates to destabilise progress towards the implementation of standardised packaging.

(3) YouGov Survey. Total sample size was 12,269. Fieldwork was undertaken between 5th and 14th March 2014. All surveys were carried out online. The figures have been weighted and are representative of all GB Adults (aged 18+).

(4) *ibid.*

(5) The Doctors Study” (Doll R, Peto R, Wheatley K, Gray R, Sutherland I. Mortality in relation to smoking: 40 years observations on male British doctors. *British Medical Journal* 1994; 309:901-911).

(6) <http://www.youtube.com/watch?v=R1AEH4Pemlw>

(7) <https://www.mja.com.au/journal/2014/200/1/association-between-tobacco-plain-packaging-and-quitline-calls-population-based>

(8) <http://onlinelibrary.wiley.com/doi/10.1111/add.12466/abstract>

(9) <http://www.aihw.gov.au/alcohol-and-other-drugs/ndshs/>

(10)

http://www.cancerresearchuk.org/prod_consump/groups/cr_common/@nre/@pol/documents/generalcontent/smuggling_fullreport.pdf

(10a) Oral Evidence to the House of Lords European Sub Committee (Home Affairs) on 24th July 2013

(10b)

<http://www.publications.parliament.uk/pa/cm201415/cmselect/cmhaff/200/200.pdf>

(11)

http://customs.hmrc.gov.uk/channelsPortalWebApp/channelsPortalWebApp.portal?_nfpb=true&_pageLabel=pageLibrary_MiscellaneousReports&propertyType=document&columns=1&id=HMCE_PROD1_031246

(12)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/249543/131009_Publication_of_Tobacco_Tax_Gap_estimates_2012-13.pdf

(13)

http://www.pmi.com/eng/media_center/media_kit/Documents/SUN%20Report%202013.pdf

- (14) http://www.illegal-tobacco.co.uk/wp-content/uploads/2014/03/NE_Illicit_Tobacco_Report_key_findings.pdf
- (15) http://tobaccofreeutures.org/wp-content/uploads/2013/08/8353_TSNW-Young-Persons-Alcohol-Tobacco-Report_130605_V3.pdf
- (16) <http://londoneconomics.co.uk/wp-content/uploads/2013/11/London-Economics-Report-Australian-Prevalence-Final-Report-25-11-2013.pdf>
- (17) http://www.cancervic.org.au/downloads/tobacco_control/2013/Critique_by_Cancer_Council_Victoria_on_report_by_PMI_26.11.13.pdf
- (18) <http://www.abc.net.au/mediawatch/transcripts/s4026465.htm>
- (19) <http://www.health.gov.au/internet/main/publishing.nsf/Content/tobacco-kff>
- (20) <http://www.theguardian.com/society/datablog/2014/jun/06/is-smoking-increasing-in-australia>
- (21) <http://tobaccocontrol.bmj.com/content/early/2013/05/25/tobaccocontrol-2013-050987.abstract>

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?

29. We broadly welcome the comprehensive draft regulations particularly in terms of the stipulated colour of tobacco packets; the minimum number of cigarettes or minimum weight of hand rolling tobacco that a packet can contain; the reassurance that these regulations will not affect other labelling requirements for tobacco products such as health warnings and fiscal marks; the scope of the regulations across the UK; the clarity of the regulations in relation to their impact on trade mark protection; the scope to include the changes required for Directive 2014/40/EU.

30. However there are some issues with the draft regulations that we would like to see addressed.

31. The draft regulations apply only to cigarettes and hand-rolling tobacco. We believe that the regulations should also apply to specialist tobacco products including cigars, cigarillos and 'blunts'. The rationale for this exclusion is low rates of use, particularly by young people, and the provision is made that that the regulations could be extended if young people become increasingly attracted to these types of tobacco. Our view is that this opportunity should not be missed to highlight to young people the dangers of these products before consumption increases and that the regulations should be extended now to include specialist tobacco products rather than when these products have become a problem so that there is a level playing field.

32. The draft regulations do not propose requirements relating to the size or length of cigarettes. Evidence in the North East shows that young women in

particular are attracted to slim cigarettes therefore regulations should be included to stipulate a minimum size of cigarette. This would also prevent any opportunity for slim cigarettes to be repositioned as cigarillos thereby becoming exempt from regulations given their specialist tobacco products status (unless this exemption is removed as recommended).

33. The draft regulations do not propose requirements relating to the size of cigarette or tobacco packets. Instead, the only stipulation in terms of size is 'cuboid' and this is open to interpretation. This is a real concern and a potential weakness in the regulations. Dimensions should be provided to ensure consistency and to prevent the tobacco manufacturers from determining the size themselves and using it as a means of product differentiation. In Australia, the minimum dimensions for a 20 pack of cigarettes are stipulated as follows and we recommend the UK government follows this model:

Physical features of cigarette packs

The dimensions of a cigarette pack, when the flip-top lid is closed, must not be:

- (a) height — less than 85 mm or more than 125 mm; and
- (b) width — less than 55 mm or more than 82 mm; and
- (c) depth — less than 20 mm or more than 42 mm.

33a. Once standardised packaging is introduced, brand names, variant names and brand descriptors will all become important tools for the tobacco industry to differentiate their brands from others. Recital (27) of the EU Tobacco Products Directive covers this issue listing words that are misleading e.g. 'low-tar' and 'light.' However, the list included at Recital (27) is not comprehensive and we urge the government to include additional words where there is evidence that they are misleading to consumers by creating the false impression that they are less harmful to health e.g. 'smooth,' colour names such as 'gold' or 'silver' and numbers. The burden should be on the tobacco industry to prove that any brand names, variants or descriptors are not misleading before they can be put on sale in the UK.

34. The requirements prevent packaging from producing a noise or scent but do not prohibit any smell arising from a permitted additive. Tobacco manufacturers will be innovating packaging now to ensure they can work around these regulations therefore we feel that any scent other than that which normally arises from tobacco products should be prohibited. This is particularly relevant for menthol cigarettes which, under the directive 2014/40/EU, have an exemption until 2020. The development of capsule cigarettes shows that the tobacco industry is still innovating in this area.

34a. Leading up to the legislation in Australia, tobacco companies launched strategies to try to secure its customer base, refreshing brand names and providing extra 'value for money' to retain consumer interest including the launch of capsule cigarettes, re-designing packaging and lengthening product names to increase their prominence. The government should be mindful of any similar activity in the UK and take action as necessary. (21a)

35. The requirements only apply to retail packaging of tobacco products and not packaging that is used only within the tobacco trade, for example for stock management in a warehouse or wholesale premises. It would be preferable for the requirements to apply to all tobacco packaging to avoid any potential confusion over definitions of warehouses.

36. To aid enforcement of the regulations, it would assist if images of the packages, currently in Appendix C of the consultation document, were placed in the body of the regulations. A similar approach is used in other legislation that has specific labelling or presentation requirements, for example the regulations on pack health warnings.

37. Local authority Trading Standards officers will be tasked with enforcing this legislation. Trading Standards departments are playing an increasing role in public health and in tobacco control in particular. We feel therefore that it is important that the UK government invests in this vital service and provides it with the leadership and powers it needs to sustain this vital function.

(21a) Scollo M, Occleston J, Bayly M, Lindorff K, Wakefield M. Tobacco product developments coinciding with the implementation of plain packaging in Australia. *Tobacco Control*, 30 April 2014. doi:10.1136/tobaccocontrol-2013-051509

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?

38. We welcome the overall recommendations of the consultation-stage impact assessment particularly its statement that the implementation of standardised tobacco packaging is worth pursuing now and that the cost of delaying a decision is too great in public health terms.

39. We welcome the decision to review the policy after five years which will allow time for early impacts to become clear although it needs to be borne in mind that long term impacts such as reduced youth uptake, reductions in smoking prevalence and improvements in public health will take many years to manifest.

40. We understand the difficulty of apportioning value to certain outcomes from interventions but there are some statements within the impact assessment that are particularly difficult to accept including:

“an additional benefit [of implementing standardised packaging] is the possible enhancement of price competition between tobacco companies and the potential for accelerated product innovation to exploit other avenues for product differentiation.”

“consumer surplus [identified as a cost] represents the loss of the ability of those who continue to smoke to gain the intangible benefit associated with smoking a particular brand that only the packaging of that brand, as it is currently available, can produce.”

The reality is that all cigarettes, regardless of brand or price, will kill one in two of its long-term users. Making products more affordable or more attractive cannot be judged to be a benefit.

41. We support any effective measures to maintain the costliness of tobacco in particular adjusting rates on tobacco duty above those currently required by the duty escalator, given that price is the single most effective policy lever for reducing smoking prevalence available to governments. Peto (22) has recommended an approach to taxation that would have a significant impact on consumption: tripling inflation-adjusted specific excise taxes on tobacco which would approximately double the average price of cigarettes (and more than double prices of cheaper brands) which would reduce consumption by about a third and actually increase tobacco revenues by about a third. We can fully expect the tobacco industry to respond to standardised packaging by dropping prices to make smoking more affordable.

41a. It is important to note that tobacco sales are undergoing a long-term decline from the peak of tobacco smoking in the 1950s when adult male smoking prevalence was 80%. Female smoking reached a peak of 45% in the mid 1960s. Smoking prevalence has since declined rapidly amongst men and women and is now less than 20%. Data from HMRC shows the impact that this has had on sales of tobacco with the number of sticks cleared for UK sales falling from over 94 million in 1992/3 to just under 38 million in 2012/13.

42. The impact assessment considers the potential costs that may arise through increases in the demand for and the supply of illicit tobacco. However, we draw the consultation team’s attention to:

- the findings of Chantler who is not convinced that standardised packaging would increase the illicit market and found no evidence that standardised packaging is easier to counterfeit.
- evidence from Australia which has shown there to be no increase in the illicit tobacco trade since the measure was introduced while tobacco consumption has fallen

- the conclusion of the Home Affairs Committee inquiry into tobacco smuggling which recommended that any risks in this area could be mitigated by increasing enforcement action
- Peto's view (23) that use of specific excise taxes on tobacco (rather than ad valorem taxes), stronger tax administration, and practicable controls on organised smuggling can limit the problem. Even with some smuggling, large tax increases can substantially reduce consumption and increase revenue especially if supported by better tax enforcement
- the impact that health-related social marketing can have on reducing smoking at population level and, in turn, reducing the illegal tobacco market, as seen in the North East, North West and South West where the illicit tobacco market share has reduced significantly

43. The impact assessment also considers the costs for retailers and states that, anecdotally, the profit margins on the sale of tobacco may be relatively low. John McClurey, elected member for Gateshead Council and independent retailer in Newcastle, maintains that:

“most traders rely less and less on tobacco profits since the gross profit is so small. I make as much profit from a pack of chewing gum as a £6 pack of cigarettes. What my customers save by quitting or never starting to smoke, they can spend on other things. That means more money into the local economy.”

44. Standardised packaging was introduced in Australia on conjunction with larger health warnings and sustained mass media campaign, the per capita equivalent of which at then exchange rates would be £33.7 million a year in the UK. Australia is also committed to annual increases in tobacco taxation of 12.5 per cent over inflation each year for four years from December 2013.

45. Tobacco control policies should be comprehensive and complementary if they are to achieve maximum possible impact and we would support the government in refreshing its Tobacco Control Plan for England for the period in which standardised packaging is likely to be implemented. Consideration by the government must be given to the following areas if the public health benefits of standardised packaging are to be realised:

- Funding a sustained mass media campaign to support the implementation of standardised packaging
- Ensuring that stop smoking services are funded adequately
- Supporting and investing in efforts to reduce the supply of and demand for illicit tobacco through partnerships between health and enforcement based on the model of the Tackling Illicit Tobacco for Better Health Partnership (24)
- Considering tax rises on tobacco products over and above the existing escalator, particularly to counteract any possible negative effects from brand-shifting or price-cutting

- Considering further levies on the tobacco industry based on local sales data and designed to fund broad tobacco control and health costs caused by tobacco consumption.

46. The benefits of introducing standardised packaging identified in the impact assessment far outweigh the costs, many of which can be quantified at the North East level:

- Overall, the main smoking related diseases are conservatively estimated to cost the NHS across the North East £110.4 million per year
- The cost of smoking-related hospital admissions in the North East alone is calculated to be nearly £65.8 million per year
- An additional £32.1 million is lost to the regional economy each year through increased levels of absence from work from smokers compared to their non-smoking counterparts, which accounts for over 361,000 additional lost days of productivity per year across the North East.

47. We urge the government to act now to introduce standardised packaging as a matter of priority and take this vital and popular step towards making smoking history.

(22) <http://www.nejm.org/doi/full/10.1056/NEJMra1308383>

(23) <http://www.nejm.org/doi/full/10.1056/NEJMra1308383>

(24) www.illegal-tobacco.co.uk

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**

Department of Health
Standardised Packaging Tobacco Consultation
PO Box 1126
CANTERBURY
CT1 9NB