



Department
of Health

Consultation on standardised packaging of tobacco products: Summary report

July 2013

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Consultation on standardised packaging of tobacco products: Summary report

Prepared by

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Executive summary

On 16 April 2012, the Department of Health (England), the Chief Medical Officer's Directorate (Scotland), the Health and Social Services Directorate General (Wales) and the Department of Health, Social Services and Public Safety (Northern Ireland) published the *Consultation on standardised packaging of tobacco products*. The purpose of the consultation was to seek the views of interested people, businesses and organisations on a policy initiative that would require the packaging of tobacco products to be standardised, the aim being to improve public health by reducing the use of tobacco.

The original closing date for the consultation was 10 July 2012. However, in response to a number of requests, the closing date was extended to 10 August 2012 to maximise the opportunity for people to respond to the consultation.

This report has been prepared and published by the Department of Health to provide an overview of the responses received and a summary of the main themes that emerged in response to the specific questions asked in the consultation document.

Chapter 1

Overview of the consultation

1.1 Purpose of the consultation

The purpose of this consultation was to seek the views of interested people, businesses and organisations on a policy initiative that would require the packaging of tobacco products to be standardised, the aim being to improve public health by reducing the use of tobacco. Within the context of tobacco packaging, standardised packaging is often referred to as ‘plain packaging’.

The Department of Health (England), the Chief Medical Officer’s Directorate (Scotland), the Health and Social Services Directorate General (Wales) and the Department of Health, Social Services and Public Safety (Northern Ireland)¹ each have responsibility for improving public health, including reducing tobacco use through the implementation of comprehensive tobacco control strategies.

The Department of Health and Devolved Administrations have broad policy objectives to improve public health by:

- discouraging young people from taking up smoking;
- encouraging people to quit smoking;
- helping people who have quit, or who are trying to quit, to avoid relapse back to smoking; and
- reducing people’s exposure to secondhand smoke from tobacco products.

To inform policy development, we all wished to explore whether requiring tobacco products to be sold in standardised packaging could contribute to achieving these public health policy objectives by:

- reducing the appeal of tobacco products to consumers;
- increasing the effectiveness of health warnings on the packaging of tobacco products;
- reducing the ability of tobacco packaging to mislead consumers about the harmful effects of smoking; and
- having a positive effect on smoking-related attitudes, beliefs, intentions and behaviours, particularly among children and young people.

We sought feedback on whether there might be public health benefits from the introduction of standardised tobacco packaging in addition to policies currently in place, including legislation ending the permanent display of tobacco products by retailers.

There may be other effects associated with introducing standardised tobacco packaging. Through this consultation, we wished to understand in more detail what these might be, together with any evidence. In particular, we sought views on whether introducing standardised packaging would have:

- trade or competition implications;
- legal implications;
- costs or benefits for retailers or manufacturers;
- implications for the availability of, and demand for, illicit tobacco (both smuggled and counterfeit);

¹ Collectively referred to as the Department of Health and Devolved Administrations in the consultation document.

- implications for cross-border shopping; or
- any other unintended consequences.

The consultation document, which includes a description of a possible approach to standardised packaging, is available on the Department of Health's website at:

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

1.2 The consultation exercise

Through the consultation, respondents were invited to address 15 consultation questions (listed at Appendix A), and to provide views on 12 questions specific to the consultation-stage impact assessment that was published alongside the consultation (listed at Appendix B). A key aspect of the consultation was to understand from stakeholders whether further evidence exists to inform policy development, and respondents were asked to provide references to research and other evidence with their responses. For each of the 15 consultation questions, respondents were invited to provide further explanation for the answer they provided.

The original closing date for the consultation was 10 July 2012. However, in response to a number of requests, the closing date was extended to 10 August 2012 to maximise the opportunity for people to respond to the consultation.

The consultation was run by the Department of Health with the agreement of the Devolved Administrations. All consultation responses were made available by the Department of Health for consideration by the Ministers responsible for public health in all three Devolved Administrations.

1.3 Purpose of this report

This report was prepared and published by the Department of Health to provide an overview of the responses received to this UK-wide consultation and provide a summary of the main themes that emerged in response to the specific questions asked in the consultation document.

Chapter 2

Overview of responses received

2.1 Number of responses received

The number of consultation responses received was very large, indicating a significant level of awareness and engagement with the consultation. Two categories of consultation responses were received:

- *Detailed responses that addressed multiple consultation questions.* These responses include letters and responses received in hard copy, by email and through the Department of Health's online "Citizenspace" portal. In total, 2,444 responses were received in this category.
- *Campaign responses.* A number of campaigns were run that encouraged multiple respondents to answer only a handful of consultation questions (many campaigns only addressed whether standardised packaging of tobacco should be introduced or not). These responses used identical template documents (typically postcards, emails or letters), a single letter signed by multiple people or were received in the form of a petition.² In total, 665,989 responses were received in this category.

2.2 Collation, analysis and interpretation of consultation responses

The Department of Health engaged TONIC Consultants Ltd to assist with collating and undertaking initial analysis of consultation responses. The Department of Health and Devolved Administrations have undertaken, and will continue to undertake, further analysis and consideration of the issues raised consultation responses.

Given the number and breadth of consultation responses, this report cannot include every single individual comment received. The report does, however, provide an overview of all the responses received and reflects all the main themes that emerged in response to the specific questions asked in the consultation document.

As we have seen in previous consultations on tobacco control, views tend to be markedly polarised. Broadly speaking, business interests tend to be resistant to proposals to further regulate tobacco products, while public health stakeholders and NHS bodies tend to favour greater tobacco control regulation.

Some consultation responses were received from people, businesses or organisations in other countries. We did not stipulate that the consultation was only open to people, businesses and organisations in the United Kingdom. From these responses, we have noted that the introduction of standardised packaging in the United Kingdom would be of relevance to people in other parts of the world. We have included all responses, including those received from overseas, in our analysis.

² We have considered each person that signed a petition to be a separate campaign respondent.

2.2.1 Responses from individuals and groups

We acknowledge that in some cases, respondents have consulted with colleagues or a wider group prior to submitting their consultation response, and their response is intended to represent the views of the wider group. Such responses may represent a team, department or, in the case of membership organisations, an entire organisation. They may have sought and included the views of local stakeholders, interested parties, local community groups and members of the public.

It is therefore not possible to make direct comparison simply between the numbers of respondents recorded as being of a certain view on any question, within certain categories or between viewpoints. The Department of Health and Devolved Administrations are mindful of the diversity in the nature of responses received.

2.2.2 Limitations of consultations to elicit representative samples of public opinion

The findings from this public consultation cannot, therefore, be considered in the same way as, for example, a survey of public opinion. Neither can the results be used to generalise or extrapolate public opinion in the way that data can be used from representative quantitative research. The consultation was not intended or designed to elicit representative samples of public opinion. The consultation rather, sought information and views relating to the policy on the possible options to standardise tobacco packaging.

It is in the nature of open consultation exercises that, generally, it is only those who already have an interest in the subject who make a detailed response. The nature of consultation exercises means that respondents are self-selecting.

2.3 Presentation of consultation responses

This report provides an overview of the responses received and a summary of the main themes that emerged in response to the specific consultation questions that were asked. The key themes that emerged from detailed consultation responses we received are summarised under each question in the next chapter.

We wish to be clear that this report reflects the views of those who responded to the consultation and does not provide any assessment of these views by the Department of Health and Devolved Administrations. The inclusion of views in this report should not be taken to mean that the Department of Health and Devolved Administrations agree or disagree with them.

Chapter 3

Responses to consultation: number of detailed responses received

This chapter provides an overview of the detailed consultation responses that were received. In this report, detailed responses are defined as those responses that addressed multiple consultation questions.

Detailed responses include letters and responses received in hard copy, by email and through the Department of Health’s online “Citizenspace” portal. Responses in this category include all responses that were presented, whether in one of the template response formats provided, or in other formats such as letters or emails. In total, 2,444 detailed responses were received.

Respondents were asked to provide their name and contact information and to indicate whether:

- their response relates to the United Kingdom, England only, Scotland only, Wales only or Northern Ireland only;
- they were responding as a member of the public, a health social care professional, on behalf of a business or as a sole trader, or on behalf of an organisation;³
- they, or the business or organisation that they are representing, have any direct or indirect links to, or receive funding from the tobacco industry; and
- they wished their name as a respondent to remain confidential so that it is not published in this report.

3.1 Information about detailed responses received

The majority of respondents stated that their response related to the whole of the United Kingdom (or it was assumed that it did because the respondent gave no indication), as set out in **table 3.1**.

United Kingdom	1,957
England only	365
Scotland only	65
Wales only	15
Northern Ireland only	42
Total	2444

Table 3.1: Where detailed consultation responses relate to

Detailed consultation responses were received from a diverse range of stakeholders, as set out in **table 3.2**.

³ Those responding on behalf of a business or as a sole trader, or on behalf of an organisation were asked to provide more information about the type of business or organisation.

As a member of the public	1,343
As a health or social care professional	351
On behalf of a business or as a sole trader	220
On behalf of an organisation	530
Total	2444

Table 3.2: Categories of respondents

Those responding on behalf of a business were asked to indicate its type, as set out in **table 3.3**. The majority of business respondents were tobacco retailers (in particular, convenience stores) and tobacco manufacturers.

Tobacco retailer (supermarket)	2
Tobacco retailer (convenience store)	79
Tobacco retailer (other type of shop or business)	29
Specialist tobacconist	12
Duty-free shop	2
Wholesale tobacco seller	7
Tobacco manufacturer	19
Retailer not selling tobacco products	1
Pharmaceutical industry	0
Other	69
Total	220

Table 3.3: Categories of businesses that submitted detailed responses

Those responding on behalf of an organisation were asked to indicate its type, as set out in **table 3.4**. The majority were NHS organisations and local authorities.

NHS organisation	128
Health charity/NGO (working at national level)	33
Local Authority	94
Local Authority Trading Standards or Regulatory Services Department	19
Local tobacco control alliance	61
Retail representative organisation	10
Other type of business representative organisation	20
University or research organisation	17
Other	148
Total	530

Table 3.4: Categories of organisations that submitted detailed responses

3.2 Respondents with links to the tobacco industry

Respondents were asked whether they, or the business or organisation that they were representing, had any direct or indirect links to, or receive funding from the tobacco industry. The response to this question is set out in **figure 3.1**. Several respondents stated that they welcomed the opportunity to declare such links. Some membership organisations made clear that they have some members that are involved with the tobacco industry and other members who are not.

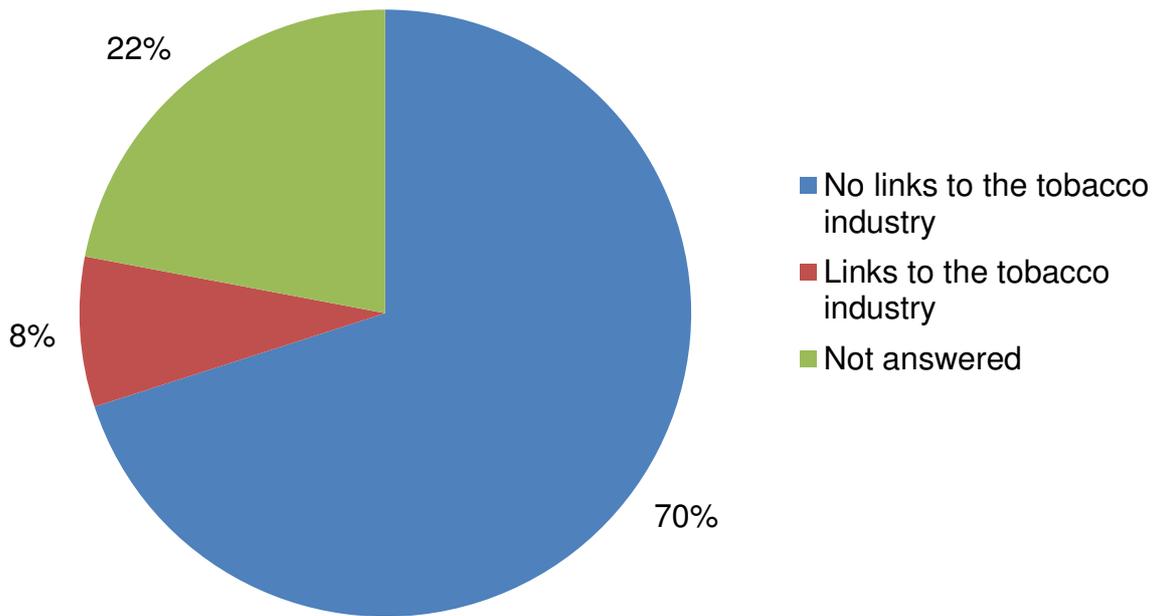


Figure 3.1: Respondents that have links to the tobacco industry

Chapter 4

Responses to consultation: answers to consultation questions from detailed responses

Respondents were invited to address 15 consultation questions set out in the consultation document (listed at Appendix A). This chapter summarises the key themes that emerged from each of these questions. Our analysis has shown that there is a significant degree of polarisation between respondents who favoured standardised packaging and those who favoured the “do nothing” option.

4.1 Question 1

Which option do you favour?

- **Do nothing about tobacco packaging (i.e., maintain the status quo for tobacco packaging);**
- **Require standardised packaging of tobacco products; or**
- **A different option for tobacco packaging to improve public health.**

There were 2,424 detailed responses that addressed Question 1, with 53 per cent favouring the requirement of standardised packaging of tobacco and 43 per cent favouring doing nothing about tobacco packaging. The remaining 4 per cent of respondents were either neutral or favoured a different option for tobacco packaging to improve public health. Responses to Question 1 are shown in **figure 4.1**.

There was very little variation in the responses to this question from businesses and business-related organisations, with the majority favouring the “do nothing” option. On the other hand, the majority of local authority and health-related organisations that responded favoured requiring standardised packaging of tobacco.

No suggestions were offered regarding a different option for tobacco packaging to improve public health, although several alternatives either instead of, or in addition to, standardised packaging were presented. These included increased education within schools, greater policing of underage sales and legislation to prohibit “proxy” purchasing and harsher penalties for making and selling illicit tobacco and larger health warnings on packs.

4.2 Question 2

If standardised tobacco packaging were to be introduced, would you agree with the approach set out in paragraphs 4.6 and 4.7 of the consultation?

There were 2,234 detailed responses that addressed Question 2, with 54 per cent agreeing with the approach for standardised packaging of tobacco set out in the consultation and 39 per cent not agreeing. A remaining 7 per cent did not know or did not offer a view.

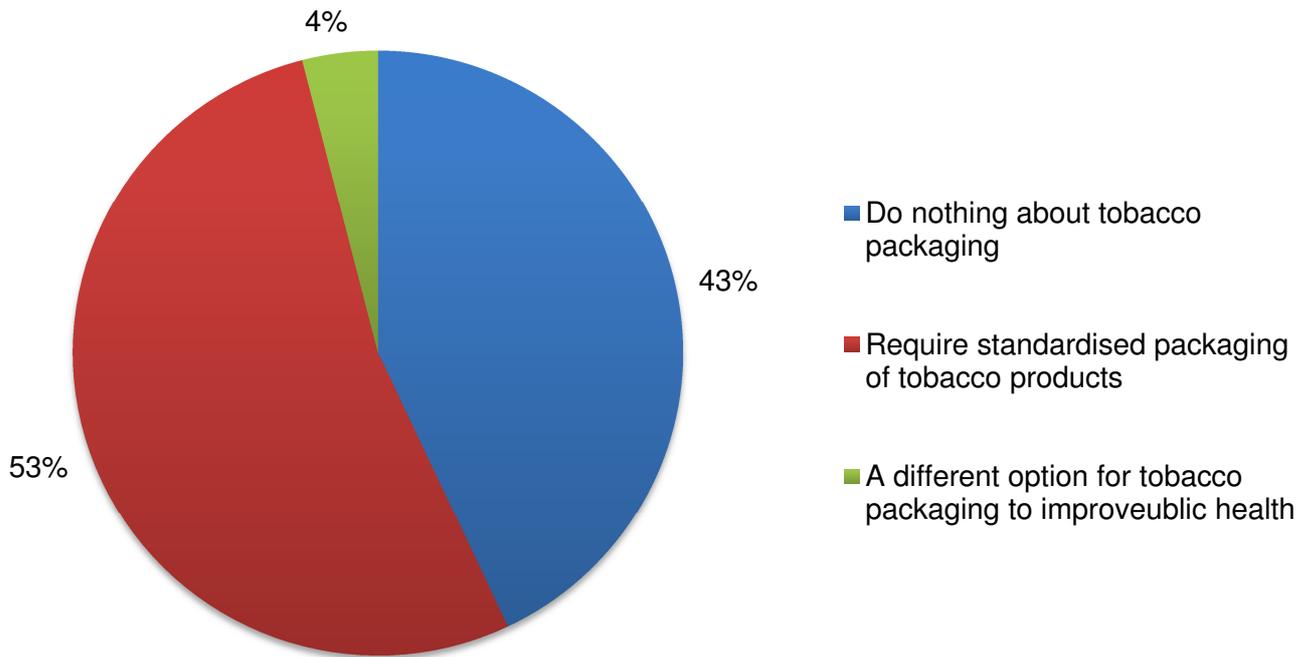


Figure 4.1: Which option do you favour?
(number of respondents = 2424)

The consultation document included a description of a possible approach to standardised packaging. Almost all respondents who favoured the introduction of standardised packaging agreed with the approach set out in the consultation document.

Notably, a few respondents who favoured the “do nothing” or “a different” option when answering question 1 also agreed with the approach set out.

Some respondents who agreed with the proposed approach, suggested that it should go further to more closely mirror Australia’s plain tobacco packaging legislation, including by requirements for:

- larger health warnings;
- picture warnings on both the front and back of the pack;
- removal of quantitative data relating to composition (such as tar and carbon monoxide data);
- including quit support information and quitline contact details;
- restricting the length of tobacco brand variant names; and
- standardising the appearance of individual cigarette sticks.

Those respondents who favoured the “do nothing” option were likely to say that they do not agree with the approach set out in the consultation. Many of these respondents suggested that there could be wider economic impacts should standardised packaging be introduced, including:

- longer transaction times and more mistakes in shops;
- loss of business from small to large stores (such as supermarkets);
- increased stocking and restocking times;
- more opportunity for theft; and
- loss of customer satisfaction.

Some respondents who did not agree with the proposed approach were also unconvinced that the evidence underpinning standardised packaging was conclusive.

The consultation proposed that, consistent with the exemptions in the Tobacco Advertising and Promotion Act 2002, standardised packaging requirements would not be necessary during the course of business carried out solely within the tobacco trade. This would mean that brand names, colours and logos could still be used openly within the tobacco trade, provided they could not be seen by the public. Some respondents who favoured the “do nothing” option, considered this proposed exemption to be inadequate, while some supporters of standardised packaging thought that this exemption should not be provided.

4.3 Question 3

Do you believe that standardised tobacco packaging would contribute to improving public health over and above existing tobacco control measures, by one or more of the following:

- **Discouraging young people from taking up smoking;**
- **Encouraging people to give up smoking;**
- **Discouraging people who have quit or are trying to quit smoking from relapsing; and/or**
- **Reducing people’s exposure to smoke from tobacco products?**

There were 2,266 detailed responses that addressed Question 3. Of these, 54 per cent believed that standardised packaging would contribute to improving public health over and above existing tobacco control measures and 44 per cent did not believe it would. The remaining 2 per cent did not know or did not have a view.

Many of the respondents that favoured standardised packaging reiterated the findings of the Public Health Research Consortium’s systematic review. The review was published at the same time as the consultation as the source of evidence about the benefits of introducing standardised packaging. Many respondents considered that these findings confirmed that standardised packaging would be likely to reduce the attractiveness and appeal of tobacco products, increase the “noticeability” and effectiveness of health warnings and messages, and reduce the use of design techniques that may mislead consumers about the harmfulness of tobacco products.

Some of the respondents that favoured the “do nothing” option believed there is insufficient evidence to warrant introducing standardised packaging, particularly because at the time of the consultation, no such legislation had been implemented anywhere in the world and, therefore, they believed that its effects could not be known. In December 2012, Australia became the first country in the world to introduce standardised packaging requirements.

There was also criticism of the Public Health Research Consortium’s systematic review, including views of some respondents that:

- the researchers overly rely on their own research and are known to be sympathetic to the introduction of tobacco control measures;
- the evidence is speculative, “asking people what they might do in a certain situation”; and
- the research does not conclusively establish a causal link between packaging and either youth initiation, smoking cessation or relapse.

Some supporters of standardised packaging drew attention to their belief that the only way to secure the level of evidence demanded by those opposing standardised packaging is to introduce the measure because controlled experiments and evidence will always fall short without direct, real-world, evidence. Some supporters of standardised packaging included information about the impact that smoking has on public health and suggested that a delay in introducing standardised packaging would cost lives and so we cannot afford to wait for evidence of Australia's experience in introducing standardised packaging. It was pointed out by some respondents that the evidence base continues to grow.

Some respondents suggested that, with the tobacco advertising ban and the end of tobacco displays in shops, tobacco packaging represents the last remaining channel of promotion available to tobacco companies. These respondents believed that addressing packaging is the next logical step in tobacco control.

The majority of responses from health-related organisations supported the view that standardised packaging would contribute to improving public health. Some respondents suggested that public health would be improved even further should larger health warnings be required on tobacco packaging.

The majority of businesses and business-related organisations that responded to this question answered "no". Many suggested standardised tobacco packaging could actually work against public health by leading to increased illicit tobacco and lower tobacco prices that would increase the appeal of tobacco, especially for younger people and smokers with lower incomes. They considered lower prices to be inevitable if tobacco companies could only compete on price.

Some respondents drew attention to recently introduced legislation to end the display of tobacco in shops and other recent control measures, arguing that they have not had time to be fully implemented or evaluated. They believed that it would be premature to move to a next step until the full effect of these earlier initiatives is known. Some respondents also suggested that ending tobacco displays and then introducing standardised packaging for tobacco would be illogical.

4.4 Question 4

Do you believe that standardised packaging of tobacco products has the potential to:

- a. Reduce the appeal of tobacco products to consumers?**
- b. Increase the effectiveness of health warnings on the packaging of tobacco products?**
- c. Reduce the ability of tobacco packaging to mislead consumers about the harmful effects of smoking?**
- d. Affect the tobacco-related attitudes, beliefs, intentions and behaviours of children and young people?**

4.4.1 Question 4(a): Do you believe that standardised packaging of tobacco products has the potential to reduce the appeal of tobacco products to consumers?

There were 2,277 detailed responses that addressed Question 4(a). Of these, 55 per cent believed that standardised packaging has the potential to reduce the appeal of tobacco products to consumers and 41 per cent did not believe it has. The remaining 4 per cent did not know or did not have a view.

4.4.2 Question 4(b): Do you believe that standardised packaging of tobacco products has the potential to increase the effectiveness of health warnings on the packaging of tobacco products?

There were 2,262 detailed responses that addressed Question 4(b). Half of these respondents believed that standardised packaging has the potential to increase the effectiveness of health warnings on the packaging of tobacco products and 44 per cent they did not believe it has. The remaining 6 per cent did not know or did not have a view.

4.4.3 Question 4(c): Do you believe that standardised packaging of tobacco products has the potential to reduce the ability of tobacco packaging to mislead consumers about the harmful effects of smoking?

There were 2,257 detailed responses that addressed Question 4(c). Of these, 49 per cent believed that standardised packaging has the potential to reduce the ability of tobacco packaging to mislead consumers about the harmful effects of smoking and 44 per cent did not believe it has. The remaining 7 per cent did not know or did not have a view.

4.4.4 Question 4(d): Do you believe that standardised packaging of tobacco products has the potential to affect the tobacco-related attitudes, beliefs, intentions and behaviours of children and young people?

There were 2,232 detailed responses that addressed Question 4(d). Of these, 58 per cent of respondents believed that standardised packaging has the potential to affect the tobacco-related attitudes, beliefs, intentions and behaviours of children and young people and 38 per cent did not believe it has. The remaining 4 per cent did not know or did not have a view.

4.4.5 Detailed responses provided to Questions 4(a)-(d)

Although this consultation question was split into four sub-questions, many respondents reiterated the same or similar arguments in response to each of the four sub-questions.

Many respondents who favoured the introduction of standardised packaging reiterated relevant sections of the Public Health Research Consortium systematic review of evidence, including the executive summary of the review that found that:

...there is strong evidence to support the propositions set out in the Framework Convention on Tobacco Control relating to the role of plain packaging in helping to reduce smoking rates; that is, that plain packaging would reduce the attractiveness and appeal of tobacco products, it would increase the noticeability and effectiveness of health warnings and messages, and it would reduce the use of design techniques that may mislead consumers about the harmfulness of tobacco products. In addition, the studies in this review show that plain packaging is perceived by both smokers and non-smokers to reduce initiation among non-smokers and cessation-related behaviours among smokers. The review also found some evidence of public support for plain packaging, although the majority of the public opinion studies were conducted in Australia.

Many of the health-related organisations that responded to this question agreed that there was evidence to suggest that standardised packaging would have the public health impacts set out in the sub-questions, including by diminishing the “style” that some respondents believed is created and maintained by tobacco brands, stopping tobacco packaging from creating misleading impressions about the harm of tobacco and because health warnings would be more prominent.

The arguments commonly made by those respondents who preferred the “do nothing” option included:

- people are already aware of the health risks and have ample exposure to health messages under current arrangements;
- branding is a necessary part of the overall tobacco offer, to communicate quality, origin and other necessary components that inform consumer choice, and so consumers are not misled or misinformed;
- packaging has no proven relationship with behaviour change and standardised packaging would not contribute to the Government meeting its tobacco control objectives (e.g. increased cessation, reduced initiation, reduced relapse); and
- there are grounds to believe that the availability of illicit tobacco would increase.

Many of the businesses and business-related organisations that responded to this question suggested that there is not good evidence to support the behavioural impacts that were suggested by Public Health Research Consortium systematic review of evidence and that are advanced by supporters of standardised packaging.

Some respondents believed that currently required health warnings on tobacco packs are already sufficient and that the risks of smoking are very well known. Some respondents also suggested that standardised packaging might actually be appealing to young people, who might increasingly regard tobacco as “forbidden fruit”.

4.5 Question 5

Do you believe that requiring standardised tobacco packaging would have trade or competition implications?

There were 2,258 detailed responses that addressed Question 5. Many of the businesses and business-related organisations that responded to this question identified a number of potential trade and competition implications associated with the standardised packaging proposals. Damage to intellectual property was frequently identified as a key impact. In addition, a belief was widely noted that standardised packaging might boost the illicit tobacco trade, thus reducing the revenues of legitimate retailers. Smaller retailers were seen to be more vulnerable to price competition from larger retailers, such as supermarkets, who could “loss-lead” to attract footfall.

Some of the respondents who preferred the “do nothing” option suggested different legal and economic arguments against proceeding with standardised packaging, including a belief that there would be changes to the structure of the retail tobacco market which could see business migrate from smaller retailers to larger retailers such as supermarkets. They suggested that competition would be reduced because consumers would not be able to discern the differences between brands. This impact on competition could suppress innovation and reduce the ease that tobacco manufacturers would have in introducing new tobacco brands or products onto the market. Some respondents suggested that consumers needed more than just a brand name to make informed purchasing choices. Some respondents suggested that current branding assists consumers to determine the quality of the product among other things. If the ability to compete on quality grounds is removed, then many respondents believe that competition in the tobacco market will be based only on price, resulting in lower priced tobacco that would be more accessible, especially for young people.

A particular issue was reported regarding specialist and non-cigarette tobacco (such as cigars and pipe tobacco). Some respondents suggested that standardised packaging would disproportionately affect the specialist tobacco trade since there are more brands of non-cigarette tobacco, a more diverse range of products, and that brand differentiation is essential in this sector. Additionally, the logistics of standardising these products would be significant, with cigars, for example, being packaged in wood, metal, paper and being sold individually or in small quantities.

Fewer health-related organisations responded to this question. Many respondents who support standardised packaging believed that any impact on trade and competition would be both proportionate and necessary, pointing out that all tobacco companies would be subject to the same restrictions and would, therefore, be equally and fairly affected. The same range of different types of cigarettes and tobacco products could still be produced, and brand names would remain available. Consumers would, therefore, still be able to exercise choice between different brands and types of product. Some respondents mentioned that brand loyalty among smokers is very high. Some respondents drew on research evidence suggesting that transaction times would not increase. It was also suggested that if standardised packaging did prompt competition on price alone, tobacco prices could be maintained through taxation.

4.6 Question 6

Do you believe that requiring standardised tobacco packaging would have legal implications?

There were 2,264 detailed responses that addressed Question 6. Many of the businesses and business-related organisations that responded to this question stated that standardised packaging could have legal implications and some suggested the measure would be illegal. While some acknowledged that the public health imperative to reduce the health harms of tobacco smoking may be used to justify market intervention, it was argued that the evidence for the efficacy of standardised packaging measures is not strong enough to justify such action. Some respondents suggested that the government could be liable to pay compensation to the tobacco industry for deprivation of property and business. The legal aspects relevant to standardised packaging that were most commonly identified by respondents were:

- deprivation of property and limiting the right to freedom of expression (European Convention on Human Rights);
- free movement of goods (Treaty on the Functioning of the European Union);
- protection of intellectual property (Charter of Fundamental Rights of the European Union; WTO Agreement on Trade Related Aspects of Intellectual Property; Paris Convention for the Protection of Industrial Property); and
- implications for trade mark law (including Community Trade Marks) and trade mark registration (Trade Marks Act 1994; Regulation (EC) 207/2009; Directive 2008/95/EC).

Some of the respondents that preferred the “do nothing” option drew attention to questions of legality, pointing out that several tobacco companies have launched legal challenges to the plain tobacco packaging legislation being introduced in Australia.

The Australian Government provided a response to the consultation that explains that they have considered the legal aspects relevant to the introduction of plain packaging legislation in that country and that they consulted widely with affected parties during the development of their policy. The Australian Government introduced a Tobacco Plain Packaging Bill 2011 and a Trade Marks Amendment (Tobacco Plain Packaging) Bill 2011. Both Bills received Royal Assent and became law in Australia in December 2011; coming into effect on 1 December 2012. Two separate pieces of secondary legislation (the regulations) relating to cigarette and non-cigarette tobacco products have been passed following further consultation in Australia. The Australian Government reported that legal challenges from several

companies were made on the grounds that Australian plain packaging legislation is unconstitutional. They stated that three World Trade Organization (WTO) members have also requested consultations (the first step in the process of WTO arbitration) about possible inconsistency between the Australian plain packaging legislation and WTO trade agreements. The Australian Government believes that their right to make these legal measures is in compliance with WTO obligations, on the grounds that WTO members have the right to make measures necessary to protect public health. The Australian Government also reported that a formal complaint that had been lodged by a tobacco company under one of Australia's bilateral trade agreements.

Fewer health-related organisations responded to this question compared to other questions. Some supporters of standardised packaging suggested that introducing standardised packaging would not give rise to any legal difficulties and believed that the potential to improve public health was sufficient justification for it to be introduced. Some supporters of standardised packaging also referred to the readiness of the industry to mount legal challenges and described such action as representing delaying tactics, claiming that the record shows that these challenges are frequently withdrawn or dismissed. Arguments were also presented that standardised packaging should be introduced to promote public health, and that delays in introducing the measure would cost lives.

4.7 Question 7

Do you believe that requiring standardised tobacco packaging would have costs or benefits for manufacturers, including tobacco and packaging manufacturers?

There were 2,209 detailed responses that addressed Question 7. There was broad agreement among the respondents answering this question that requiring standardised tobacco packaging would have implications for manufacturers. Several supporters of standardised packaging suggested that such a policy would have longer-term cost implications for tobacco manufacturers if it was successful in reducing smoking rates, especially by discouraging young people to start smoking. Some supporters of standardised packaging argued that the initial, one-off, costs to manufacturers would be offset in the long-term by a reduction in the costs of redesigning and refreshing packaging and branding. They also suggested that any longer-term impact on profits would most likely only be gradual.

The costs associated with increased competition from illicit trade was the most common business-related response to this question. Other responses from business-related organisations were varied. It was noted that the measures might advantage larger tobacco manufacturers who would be better placed to compete on price than smaller manufacturers. Others suggested that standardised packaging would be a significant barrier to market entry for those wanting to introduce new tobacco brands or products.

Some respondents noted that manufacturers might lose considerable income from reduced sales of premium brands, for which the main point of differentiation is in branding and packaging. Standardised packaging, they believed, would result in competition on price alone, as well as the possibility of increased competition from illicit tobacco (see below for responses to consultation Question 9 about illicit tobacco).

Packaging manufacturers noted that there would be losses associated with redundancy of specialised machinery and loss of business from tobacco manufacturers who currently require complex branding designs and security features to be incorporated into packaging.

Respondents who preferred the “do nothing” option suggested a number of other costs that would be incurred if standardised packaging was introduced, including the:

- possibility of job losses;
- devaluing of British business, due to compromised intellectual property rights and less innovation;
- additional costs of producing standardised packs for the UK market while making conventional branded packs for other markets;
- wider impact on associated industries such as designers, printers and machinery manufacturers; and
- likely disproportionate cost to small specialist tobacco manufacturers, creating an unfair advantage for larger tobacco producers.

4.8 Question 8

Do you believe that requiring standardised tobacco packaging would have costs or benefits for retailers?

There were 1,798 detailed responses that addressed Question 8. Many of the businesses and business-related organisations that responded to this question suggested that retailers, particularly smaller retailers, would incur costs as a result of standardised packaging. Several retailer respondents noted that they were already dealing with the cost of implementing legislation to end tobacco displays (such as installing new gantries) and suggested that the implications of standardised packaging from their perspective could include:

- longer transaction times;
- longer queues that could result in missed or lost custom;
- more errors and customer complaints; and
- down-trading on brands, resulting in less profit per pack.

Many suggested that if standardised packaging increased the illicit tobacco trade, this would reduce the revenues of all legitimate retailers. Some respondents said that smaller retailers were likely to be especially vulnerable to competition both from the illicit trade and from larger retailers that could compete on price more effectively.

Smaller retailers argued that their place in the market is based on convenience and quick service. Smaller retailers were regarded as more reliant on tobacco sales to generate “footfall” drawing customers who are likely to make other purchases. Many of these small retailers that responded were concerned that any increase in serving time could drive customers to bigger stores (such as supermarkets) or towards illicit sources. Some respondents noted that some small retailer businesses are particularly reliant on the sale of tobacco.

Opinion on whether standardised packaging would increase transaction times in shops was divided, however, with a number of supporters of standardised packaging reiterating that the only peer-reviewed and published evidence on transaction times in shops, showed reduced transaction times. However, some respondents that favoured the “do nothing” option, pointed out that this research is limited by the “laboratory” conditions under which the research was conducted, and suggested that other studies have shown that retail transaction times would go up. Some respondents said that experience from Australia would be useful in identifying impacts on transaction times.

Some of the health-related organisations that responded to this question doubted that queuing and transaction times would increase, if retailers implemented efficiencies in their processes such as arranging their cigarettes in alphabetical order or some other way. Some supporters of standardised packaging also suggested that the decline in sales of tobacco would be only gradual if standardised

packaging was introduced, allowing retailers the time to manage any loss of business and develop trade in alternative products.

4.9 Question 9

Do you believe that requiring standardised tobacco packaging would increase the supply of, or demand for, illicit tobacco or non-duty-paid tobacco in the United Kingdom?

There were 2,269 detailed responses that addressed Question 9. Opinion was almost equally divided on whether standardised packaging would increase the supply of, or demand for, illicit tobacco. Many respondents made distinctions in their responses about the different types of illicit tobacco that exist, and how the market has changed in recent years.

There were many replies from businesses and business-related organisations, and almost all of these suggested that standardised packaging would both increase the supply of and the demand for illicit tobacco. These respondents said that standardised packaging would be easier to counterfeit, reduce counterfeiter's costs and make it easier for counterfeiters to enter the illicit market. They also believed that standardised packaging would make it more difficult for law enforcement officers to detect counterfeit tobacco, especially as members of the public would be less able to identify when they had been sold counterfeit tobacco. Responses also raised concern about how an increase in illicit tobacco would have an impact on the profits of legitimate businesses and decrease tax revenue. Some respondents were also concerned that standardised packaging could increase the amount of poor quality tobacco on the market that would lead to further health harms. Some respondents suggested that even if standardised packaging was introduced, some smokers would seek out tobacco with branded packaging, whether it was legitimate or not, which would favour counterfeiters of branded products. Some respondents focused on the risk that standardised packaging could make it easier to counterfeit tobacco products.

Many supporters of standardised packaging responded to this question. A point frequently made was to emphasise how effective government action has been over the past decade to reduce the overall illicit tobacco market in the United Kingdom. Some respondents considered that an increase in the size of the illicit tobacco market would be less of a risk to public health than not introducing standardised packaging.

Many respondents described the current anti-counterfeiting measures, such as covert markings, and that producers of illicit tobacco would still have to circumvent these measures, which are difficult to reproduce. Some respondents suggested that the tobacco industry could voluntarily do more to improve the security of tobacco packaging, such as through additional covert markings, and that it was in their own interests to do more to reduce illicit tobacco. In addition, some respondents suggested that a licensing scheme for tobacco retailers, as has been introduced in Scotland, could be set up in other parts of the United Kingdom, and incorporate penalties for retailers that sell illicit tobacco.

Some respondents described how easily and cheaply counterfeiters can copy current branded packaging and that requiring standardised packaging is largely irrelevant and will make it neither easier, nor more difficult, for counterfeiters.

4.10 Question 10

People travelling from abroad may bring tobacco bought in another country back into the United Kingdom for their own consumption, subject to United Kingdom customs regulations. This is known as ‘cross-border shopping’. Do you believe that requiring standardised tobacco packaging would have an impact on cross-border shopping?

There were 2,256 detailed responses that addressed Question 10. While a greater number of respondents did not believe that requiring standardised tobacco packaging would have an impact on cross-border shopping, a substantial number of respondents said that they did not know, or had no view.

Some respondents that favoured the “do nothing” option suggested that standardised packaging could lead to people purchasing more tobacco abroad than at present, as the cachet of branded tobacco would remain and could grow stronger. Such an increase, it was suggested, would lead to a loss of tax revenues and have a negative impact on retailers. Some responses suggested that if smokers cannot buy branded packs in the United Kingdom, they might turn to the internet to buy tobacco.

Some supporters of standardised packaging considered that cross-border shopping for tobacco would not increase significantly, that smokers were unlikely to engage in a greater amount of international travel just to bring back branded packs and that doing so would be too costly. Respondents believed that cross-border shopping had generally declined over recent years and that HMRC’s rules about how much tobacco travellers can bring into the UK for personal had recently been tightened. Some respondents also suggested that if cross-border shopping for branded tobacco did increase, it would be a demonstration that branding is effective in motivating people to smoke and would be another justification for bringing standardised packaging measures into place.

4.11 Question 11

Do you believe that requiring standardised tobacco packaging would have any other unintended consequences?

There were 2,225 detailed responses that addressed Question 11. Opinion was almost equally divided on whether requiring standardised tobacco packaging would have any other unintended consequences, although a substantial number of respondents said that they did not know, or had no view.

Many opponents of standardised packaging said that their views on unintended consequences had already been included in their replies to earlier questions. However, a number reiterated their belief that standardised packaging would cause greater price-based competition, which would drive the price of tobacco down.

Some businesses and business-related organisations offered further thoughts on the possible unintended consequences of introducing standardised packaging. It was suggested that investors overseas might lose confidence in the United Kingdom’s protection of intellectual property rights, potentially damaging our standing as an innovative place to do business. Others suggested that standardised packaging would stimulate demand for and supply of greater levels of illicit tobacco. Illicit tobacco would be sold without due concern for tobacco sales legislation, such as age of sale restrictions and counterfeit tobacco is likely to be of poorer quality.

Some of the health-related organisations that responded believed that there would not be any major unintended consequences.

4.12 Question 12

Do you believe that requiring standardised tobacco packaging should apply to cigarettes only, or to cigarettes and hand-rolling tobacco?

There were 1,960 detailed responses that addressed Question 12. Some 70 per cent of respondents that answered this question indicated that they believed that standardised tobacco packaging should apply to both cigarettes and hand-rolling tobacco, with 2 per cent of respondents stating that that standardised tobacco packaging should apply to cigarettes only. The remaining 28 per cent did not know or did not have a view.

Some respondents complained about the wording of this question, and suggested it implied that the Department of Health and Devolved Administrations had already formed a view on standardised packaging. To clarify, the Department of Health and Devolved Administrations had an open mind about the introduction of standardised packaging of tobacco. To have prevented ambiguity, this consultation question could, more accurately, have been worded in the following way: *'If standardised packaging were to be introduced, do you believe that it should apply to cigarettes only, or to cigarettes and hand-rolling tobacco?'* We thank respondents who brought this to our attention.

Some respondents that favoured the “do nothing” option believed that standardised packaging should not be introduced for any form of tobacco product. On the other hand, supporters of standardised packaging argued that consistency across all tobacco products would be necessary since the use of any form of tobacco can cause serious risk to health, and there are no grounds on which to treat one product differently from another. Some suggested that the most straightforward arrangements for standardised packaging would be the easiest to implement and would secure maximum compliance.

A number of respondents asked about whether standardised packaging would apply to specialist tobacco products, such as cigars, snuff and pipe tobacco, which are currently treated differently in tobacco advertising legislation. We also received a number of consultation responses from businesses involved in the specialist tobacco trade who set out their positions on standardised packaging. A common point raised by these respondents is that standardised packaging would be difficult for specialist tobacco shops to implement as there are more brands of non-cigarette tobacco, a more diverse range of products and brand differentiation is essential in this sector.

4.13 Question 13

Do you believe that requiring standardised packaging would contribute to reducing health inequalities and/or help us fulfil our duties under the Equality Act 2010?

There were 2,239 detailed responses that addressed Question 13. An initial assessment of the impact on equality was prepared and published alongside the consultation document. The responses to this question will assist in the preparation of any similar assessments that are needed in the future.

Opinion was almost equally divided on whether requiring standardised packaging would contribute to reducing health inequalities and/or help the Department of Health and Devolved Administration fulfil

duties under equalities legislation, although a substantial number of respondents said that they did not know, or had no view.

There was broad agreement that smoking is more prevalent in more deprived communities and among certain groups. On this basis, many supporters of standardised packaging suggested that health inequalities could be reduced by introducing the measure.

Many health-related organisations offered support for the view that standardised packaging would contribute to a healthier population. In particular, a number referred to the long-term impact that standardised packaging might have on reducing the number of young people taking up smoking and of prevalence rates amongst young people.

Some respondents mentioned their belief that tobacco companies particularly target certain types of tobacco brands, packaging and cigarette shapes (such as “slims”) at female customers. Respondents also referred to research that suggests women find standardised packaging less appealing than men do and that standardised packs were less likely than branded packs to reinforce beliefs among women that smoking helps people to stay slim or control their appetite.

Many respondents who favoured the “do nothing” option suggested that there would be adverse consequences associated with introducing standardised packaging. Some respondents suggested that standardised packaging could make tobacco cheaper if tobacco companies compete on price alone, which could encourage people with lower incomes, and particularly young people, to smoke. Some respondents also suggested that increased availability of illicit tobacco could open up the possibility of health harms arising from tobacco made without any quality control. These respondents argued that these adverse consequences could make health inequalities worse.

Some respondents suggested that standardised packaging would be unhelpful for smokers who, for any number of reasons have difficulty reading or have eyesight problems, as they are more likely to rely on colourful branding to identify their preferred tobacco products. Some respondents also felt that the introduction of standardised packaging would amount to “nannying” by the government as smokers can choose whether to smoke, although this point of view was contested by respondents who pointed to evidence that most smokers report becoming addicted to smoking before turning 18 years old. Other respondents were concerned that standardised packaging could stigmatise smokers.

Some respondents also suggested that the welfare of people employed in making and selling tobacco should be considered. Some respondents said that many smaller retailers of tobacco are from black and minority ethnic backgrounds and any loss of profits due to the introduction standardised packaging would have an undue impact upon these groups.

4.14 Question 14

Please provide any comments you have on the consultation-stage impact assessment.

A consultation-stage impact assessment was prepared and published alongside the consultation document. The consultation invited views from respondents on the impact assessment, asking respondents to provide further evidence and information if possible. The consultation noted that although we had an open mind about introducing standardised packaging, the impact assessment was prepared to inform responses to the consultation.

A number businesses and business-related organisations that replied to the consultation suggested that the consultation-stage impact assessment was inadequate. Some respondents noted that the standardised packaging consultation did not allow for a wider consideration of policy options, even

though respondents were invited to suggest alternatives when responding to the first consultation question. Some respondents referred to the UK Government “Better Regulation” commitments and questioned how standardised packaging would comply with the Government’s “One In, One Out” policy.

Health-related organisations provided a variety of comments on implementing the standardised packaging proposals. Broadly, these respondents were supportive of the impact assessment.

Some respondents mentioned that the inclusion of a question in the consultation that asks respondents to declare any direct or indirect links to the tobacco industry was welcome. One particular respondent noted that in other countries (including the United States and Canada, with Australia planning to follow), tobacco companies are required to report promotional expenditure. The respondents suggested that if such a reporting system were in place in the UK, the Department of Health would have better evidence to inform its development of impact assessments for a range of tobacco control legislation (including point of sale display bans and standardised packaging).

4.15 Question 15

Please include any further comments on tobacco packaging that you wish to bring to our attention. We also welcome any further evidence about tobacco packaging that you believe to be helpful.

In answering this question, many respondents chose to direct us to their responses to previous questions, suggesting that all their arguments were contained there, while others took the opportunity to summarise and reiterate the points they had already made.

The key themes identified in response to this question and additional comments made in covering letters and emails are summarised below. These are set out under two broad categories of points raised by respondents who *disagree* with proposals for standardised packaging and points raised by respondents who *agree* with proposals for standardised packaging.

4.15.1 Summary of feedback from respondents who disagree with proposals for standardised packaging

Impact of industries involved in manufacturing tobacco

Some respondents suggested that there are likely to be adverse impacts on the United Kingdom and international industries that provide goods and services to the tobacco industry, such as:

- packaging companies and their suppliers;
- logistics companies and their suppliers;
- ink manufacturers and their suppliers; and
- designers.

Impact on tobacco wholesalers and retailers

It was felt by some respondents that wholesalers and retailers would be adversely affected if standardised packaging were to be introduced.

Some respondents felt that small tobacco retailers would be disproportionately affected. For small retailers, standardised packaging could adversely affect their businesses, as tobacco sales can make a substantial contribution to profitability and are important to levels of footfall, and because of the burdens associated with complying with legislation to end the display of tobacco in shops (to come into place in

England for small shops in April 2015). Some respondents suggested that introducing standardised packaging could bring an end to their businesses.

Most retailer respondents suggested likely problems with selling standardised tobacco products, including:

- identification of products and the time taken to pick the product and queue management;
- threat of thefts due to the increased “distraction” and time taken to pick the products;
- customer confusion because of product packaging; and
- how specialist tobacco products could be clearly identified to enable sale.

Many specialist tobacco retailers proposed that specialist tobacco products should be treated differently, because children and young people are less likely to buy cigars and pipe tobacco products. These respondents felt that specialist tobacco products were not particularly appealing to young people, because of their cost and the “image”.

Evidence for standardised packaging

Many respondents set out their belief that the link between tobacco packaging and smoking take-up by young people is tenuous and, therefore, the proposals are disproportionate to the problem. Also, respondents were concerned that the consequences of the policy, including the likely costs and potential unemployment across the tobacco industry would outweigh the health benefits and savings in healthcare costs for the NHS.

Legal issues

Many respondents who disagree with standardised packaging expressed concern about the legality of removing branding from tobacco packaging. Some respondents felt that the deprivation of intellectual property would be a disproportionate measure, infringing the rights of manufacturers to use their intellectual property and their rights to freedom of communication as protected by the European Convention on Human Rights, EU Charter on Fundamental Rights, World Trade Organisation TRIPS Agreement and the Paris Convention for the Protection of Industrial Property.

Illicit tobacco

Many responses reiterated their concerns that standardised packaging could make it easier for counterfeiters to copy tobacco packaging and that consumers would find it difficult to differentiate between genuine and counterfeit tobacco products. Despite the reductions in the size of the illicit tobacco market in recent years, some respondents believed that the illicit tobacco trade is a significant and growing problem in the United Kingdom and said that law enforcement agencies would be unable to respond to any potential upsurge in activity. Some respondents expressed concern that any increase in the illicit tobacco trade caused by standardised packaging would have an adverse impact on the police. Some respondents also expressed concern that an increase in illicit tobacco would have impacts on tax revenues.

Some packaging manufacturers commented that standardised packs, with printed 4-colour health warning and one solid colour would be easy to counterfeit. According to these respondents, most cigarette packs are printed using “gravure” technology, which maintains strong colours, metallics and consistency of colour across large volumes. According to these respondents, such technology is expensive to buy and is a barrier to counterfeiting.

Standardised packaging and tobacco price

Many respondents reiterated their concerns that standardised packaging would cause an increase competition in the tobacco market based on price, with the likely consequence being reduced prices for tobacco. It was suggested by some respondents that a move to standardised packaging would result in a move away from premium brands and price would become the only product differentiator. A wholesale business said that this would reduce the cash margins available on selling tobacco because, typically, the percentage margin on premium tobacco branded cigarettes is 3 per cent more than economy products. Some respondents suggested that the resulting reduction in prices would make cigarettes more affordable and therefore more appealing, especially for young people. Some respondents also suggested that if the tobacco market becomes focused on price, it would be more difficult for new tobacco brands or products to gain a foothold, and possibly affecting the size of the market.

Freedom of choice

Some respondents were concerned that standardised packaging would limit smokers' freedom of choice and would represent the "nannying" of smokers by the government. Others were concerned that standardised packaging for tobacco would quickly lead to standardised packaging for other consumer products such as alcohol, fatty foods or confectionary. Some supporters of standardised packaging, however, pointed out that tobacco is a uniquely dangerous consumer good and that is why strict regulation is warranted, and why it is regulated more strictly than other types of products, including age of sale restrictions, a ban on advertising and the introduction of laws to end of tobacco being displayed in shops.

Current tobacco control measures

Some respondents expressed concern that standardised packaging was being proposed by the Department of Health and Devolved Administrations without taking into account other current smoking control initiatives. Some respondents called for a review of the effectiveness of current measures, to inform whether further action is required.

Some suggested that a reasonable approach would be to undertake an objective review of these measures after a period of time to identify changes in smoking prevalence rather than introduce other measures now. Some also felt that the proposals would demonstrate excessive regulation and duplication of existing measures.

Alternative policy options instead of standardised packaging

Some respondents identified measures that they believe would contribute to the broad tobacco control policy objectives of the Department of Health and Devolved Administrations instead of introducing standardised packaging. Suggestions included:

- better funded and more effective enforcement against the illicit trade and of cross-border shopping undertaken to feed the illicit market;
- more enforcement against underage sales and better use of banning orders to stop those who persistently sell tobacco products to underage customers from selling tobacco altogether for a period of time;
- increasing penalties for those involved in making or selling illicit or counterfeit tobacco products;
- making 'proxy purchasing' illegal;
- endorsing and funding age verification schemes; and
- more education and smoking and its consequences in schools.

Some respondents noted that standardised packaging legislation is to be implemented in Australia in late 2012 and suggested that a “wait and see” approach should be taken in the United Kingdom, so that information on the following can be obtained from Australia:

- outcomes of legal challenges against the Australian Government;
- evaluation of implications and impact on businesses;
- whether there are increases in the illicit tobacco market;
- evaluation of public health benefits ; and
- whether there are any unintended consequences.

4.15.2 Summary of feedback from respondents who agree with proposals for standardised packaging

Responsibilities of government

Many respondents that support standardised packaging suggested that it is the responsibility of government at all levels, as well as the NHS and other public bodies, to promote good public health. Some respondents mentioned that smoking is the biggest cause of preventable death and that half of those who smoke will die from smoking-related diseases.

Many respondents also set out that smoking is an addiction of childhood that must be tackled, and that the vast majority of smokers say they started smoking regularly before they are 18 years old. Smokers that become addicted before turning 18 years of age are not in a position to be able to make fully informed, adult choices about whether to smoke.

Local public health context

Some local authorities and NHS bodies included descriptions about smoking in their areas, including information on local smoking prevalence, mortality and costs to the NHS in treating smoking-related illness. Some respondents provided information on the link between smoking and health inequalities. This information was cited in support of their calls for the introduction of measures to curb smoking, including standardised packaging. For example, a respondent from the North East of England described smoking as remaining the largest cause of premature death, disease and health inequalities in the North East, killing 11 people a day and costing at least £210m a year to the NHS and economy through treating smoking related conditions, second hand smoke and the loss to businesses through smoking related sickness and absenteeism. In County Durham, the cost is estimated to be £21 million a year and smoking attributable deaths in County Durham are higher than average in the North East of England.

Evidence for standardised packaging

Some respondents provided additional references to research and evidence that they believe supports the case for standardised packaging, including the British Medical Association’s reports *Forever Cool: the influence of smoking imagery* and *Breaking the cycle of children’s exposure to tobacco smoke*.

References were also made to published research that respondents believed shows that standardised packs are less attractive, strengthen the impact of health warnings and are less misleading for consumers.

Advertising and young people

Some respondents that support standardised packaging of tobacco set out their beliefs about the role of marketing, branding and packaging in the uptake of smoking by young people. They suggested that

tobacco companies deliberately target young people through packaging designs and colours. Some respondents also suggested tobacco branding and packaging was designed to be attractive and communicate the “personality” of a brand, and the packs can act as “badge products” and an extension of a person’s identity.

Some respondents reiterated their beliefs that standardised packaging would undermine the influence of tobacco branding and packaging, and therefore reduce the rates of young people experimenting with tobacco. Additionally, some suggested that standardised packaging would enable health warnings to be more prominent and enhance recall of key messages.

Illicit tobacco

Some respondents provided information and links to tobacco industry documents that describe the sophisticated mechanisms already in place to identify genuine tobacco products, which would remain in place if standardised packaging was adopted. Some respondents also described that counterfeiters can already easily copy existing branded tobacco packaging and that standardised packaging would be no easier or more difficult to counterfeit than existing branded tobacco products.

Chapter 5

Responses to consultation: campaign responses

In addition to the detailed responses, a number of campaigns were run that encouraged multiple respondents to answer only a handful of consultation questions (many campaigns only addressed whether standardised packaging of tobacco should be introduced or not). These responses used identical template documents (typically a postcards, emails or letters), a single letter signed by multiple people or petitions.

This chapter describes the campaign responses received. Certain responses have been categorised as “campaigns” where the respondent did not attempt to address more than a handful of consultation questions.

All campaigns responses that included the name and contact details of the respondent, were received by the Department of Health and Devolved Administrations were considered as genuine responses made in good faith. There was no limitation on individuals, businesses or organisations supporting one or more campaigns as well as making detailed responses.

5.1 Information about campaign responses received

In total, 665,989 campaign responses were received from 24 separate campaigns. Around two-thirds of campaign responses received were from people who are opposed to the introduction of standardised packaging (total of 427,888 responses) and one-third of campaign responses received were from people who are in support (238,101 responses) as shown in **figure 5.1**.

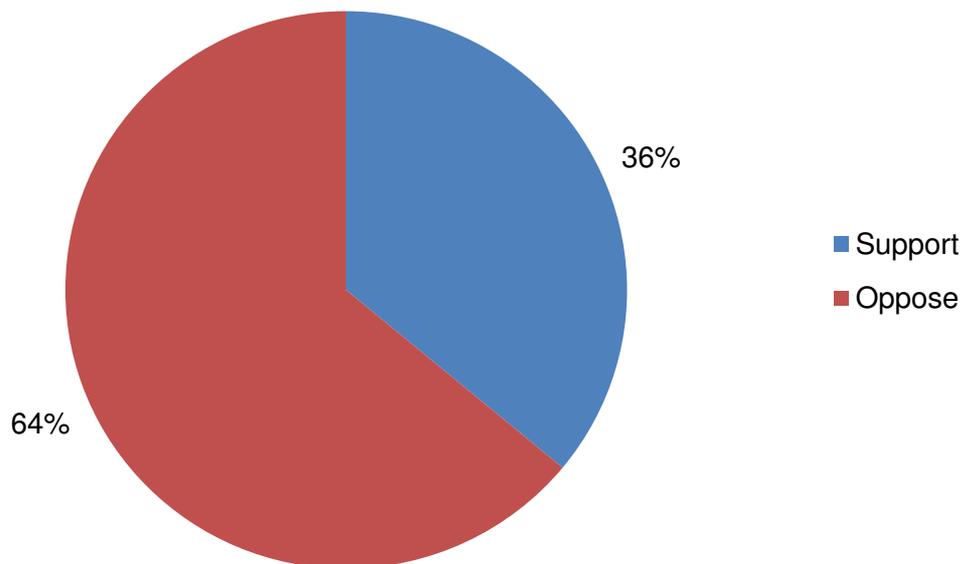


Figure 5.1: Campaign responses received by position on standardised packaging (number of respondents = 665,989)

Campaigns were clearly either in opposition to the proposals or in support of them. Businesses or organisations that already hold a clear view on standardised packaging, ran campaigns to encourage others to support their position and the majority of campaigns broadly reflected the main themes that emerged from the detailed consultation responses.

Information about each of the campaigns, including the number of responses received, is at Appendix C.

Two campaigns (Cancer Research UK's "The Answer is Plain" and Tobacco Free Future's "Plain Packs Protect") proactively provided the Department of Health with methodology statements, detailing how the campaign was run and how they attempted to avoid duplicate responses being submitted.

The Department is pleased that so many members of the public engaged with the consultation through providing either detailed or campaign responses. However, the consultation was not intended, or designed, to elicit representative samples of public opinion. Nevertheless, the Department of Health and Devolved Administrations will give due consideration to each of the campaigns.

Appendix A

Consultation questions

1. Which option do you favour?
 - Do nothing about tobacco packaging (i.e. maintain the *status quo* for tobacco packaging);
 - Require standardised packaging of tobacco products; or
 - A different option for tobacco packaging to improve public health.
2. If standardised tobacco packaging were to be introduced, would you agree with the approach set out in paragraphs 4.6 and 4.7 of the consultation?
3. Do you believe that standardised tobacco packaging would contribute to improving public health over and above existing tobacco control measures, by one or more of the following:
 - Discouraging young people from taking up smoking;
 - Encouraging people to give up smoking;
 - Discouraging people who have quit or are trying to quit smoking from relapsing; and/or
 - Reducing people's exposure to smoke from tobacco products?
4. Do you believe that standardised packaging of tobacco products has the potential to:
 - Reduce the appeal of tobacco products to consumers?
 - Increase the effectiveness of health warnings on the packaging of tobacco products?
 - Reduce the ability of tobacco packaging to mislead consumers about the harmful effects of smoking?
 - Affect the tobacco-related attitudes, beliefs, intentions and behaviours of children and young people?
5. Do you believe that requiring standardised tobacco packaging would have trade or competition implications?
6. Do you believe that requiring standardised tobacco packaging would have legal implications?
7. Do you believe that requiring standardised tobacco packaging would have costs or benefits for manufacturers, including tobacco and packaging manufacturers?
8. Do you believe that requiring standardised tobacco packaging would have costs or benefits for retailers?
9. Do you believe that requiring standardised tobacco packaging would increase the supply of, or demand for, illicit tobacco or non-duty-paid tobacco in the United Kingdom?
10. People travelling from abroad may bring tobacco bought in another country back into the United Kingdom for their own consumption, subject to United Kingdom customs regulations. This is known as 'cross-border shopping'. Do you believe that requiring standardised tobacco packaging would have an impact on cross-border shopping?

11. Do you believe that requiring standardised tobacco packaging would have any other unintended consequences?
12. Do you believe that requiring standardised tobacco packaging should apply to cigarettes only, or to cigarettes and hand-rolling tobacco?
13. Do you believe that requiring standardised packaging would contribute to reducing health inequalities and/or help us fulfil our duties under the Equality Act 2010?
14. Please provide any comments you have on the consultation-stage impact assessment.
15. Please include any further comments on tobacco packaging that you wish to bring to our attention. We also welcome any further evidence about tobacco packaging that you believe to be helpful.

Appendix B

Consultation-stage impact assessment questions

1. What would be the costs to tobacco and packaging manufacturers of redesigning packs and retooling printing processes if standardised packaging were introduced?
2. Would the cost of manufacturing cigarette packs be lower if standardised packaging were introduced, compared with the current cost of manufacturing packs?
3. How often do cigarette manufacturers amend the design of tobacco packaging for brands on the United Kingdom market, and what are the costs of doing so?
4. How many different types of shape of cigarette pack are currently on the United Kingdom market?
5. Would retailing service times be affected, and if so, why and by how much, if standardised packaging were introduced?
6. How could standardised packs be designed to minimise costs for retailers?
7. Would retailers bear any other costs if standardised tobacco packaging were introduced?
8. What is the average price of a packet of cigarettes in the following cigarette market segments?
 - Premium brands
 - Mid-price brands
 - Economy brands
 - Ultra-low-price brands
9. What percentage of total cigarette sales in the United Kingdom are in each of the following cigarette market segments?
 - Premium brands
 - Mid-price brands
 - Economy brands
 - Ultra-low- price brands
10. How does the total price of a packet of cigarettes break down into manufacturing costs, distribution costs, tax, other costs, profits for retailers and profits for the tobacco manufacturer in the following cigarette market segments?
 - Premium brands
 - Mid-price brands
 - Economy brands
 - Ultra-low-price brands

11. Would consumers trade down from higher-priced to lower-priced tobacco products if standardised tobacco packaging were introduced?
12. Of the total cigarette market in the United Kingdom, what proportion is sold in cartons rather than in individual packs?

Appendix C

Campaign responses

In this Appendix, the details and number of respondents for each campaign received during the consultation is set out. This Appendix is arranged by those campaigns in support and those opposed to standardised packaging.

1. Campaigns in support of standardised packaging

a. Plain Packs Protect

Sponsor	Campaign	Type	Text	Count
Plain Packs Protect ⁴ (coordinated by Tobacco Free Futures) and Tobacco Free Futures	(i) Make Smoking History for Children (Plain Packs Protect) (ii) Support Plain Packs and Protect our Children (Plain Packs Protect)	Postcard	(i) I support the protection of young people from smoking through the plain, standardised packaging of tobacco products (ii) Every year, another 340,000 children in the UK are tempted to try smoking. And evidence suggests that they are more likely to be attracted by designed tobacco packs, than by plain packs. The Government has launched a public consultation on whether the UK should adopt the plain packaging of tobacco products. So help protect our children by showing your support today. To the Department of Health: I support the plain, standardised packaging of tobacco products to protect our children.	66,406
Plain Packs Protect (coordinated by Tobacco Free Futures)	Plain Packs Protect	Email	I support the plain, standardised packaging of tobacco products to protect our children. I confirm I do not have any links with or receive funding from the tobacco industry.	65,756

⁴ More information about the Plain Packs Protect campaign is at: <http://www.plainpacksprotect.co.uk/supporters.aspx>

b. Let's make smoking history for our children

Sponsor	Campaign	Type	Text	Count
Fresh North East	Let's make smoking history for our children (Plain Packs Protect)	Postcard	I support the protection of young people from smoking through the plain, standardised packaging of tobacco products. I understand that by providing my details, my signature will be fed through to the national consultation in support of plain packaging.	6,418

c. Smoke and Mirrors

Sponsor	Campaign	Type	Text	Count
Tobacco Free Futures	Smoke and Mirrors	Postcard	I am a young person (aged under 26) and I support the plain, standardised packaging of tobacco products.	299
Tobacco Free Futures		Email	<p>I am a young person aged 14 and I support the plain standardised packaging of tobacco products. Two thirds of smokers start before they are 18, and smoking still results in over 100,000 deaths per year in the UK. 4 out of 5 young people who try smoking do so before they are 14 years old 18 per cent of young people also think that the Government should do more to tackle smoking. I believe that the tobacco industry designs packs with young people in mind, as we are their potential new customers, and that they encourage us to try smoking through making the packs glamorous and attractive.</p> <p>I believe that ensuring that tobacco is sold only in plain coloured packaging with larger health warnings will help:</p> <ul style="list-style-type: none"> • Reduce the attractiveness of tobacco products to young people • stop the use of packs as promotion 	30

			<p>and advertising</p> <ul style="list-style-type: none"> • increase the effectiveness of health warnings • ensure that smokers aren't misled about some brands being less harmful than others • remove positive associations with cigarette brands/image and smoking • have a positive effect on smoking beliefs, intentions and behaviours • especially for young people and future generations <p>I confirm that I have no links with the tobacco industry <input type="checkbox"/></p>	
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d. The answer is plain

Sponsor	Campaign	Type	Text	Count
Cancer Research UK	The answer is plain	Petition	We, the undersigned, support Cancer UK's 'The answer is plain' campaign for the plain packaging of tobacco products to protect children from tobacco marketing.	24,032
GPs supporting Cancer Research UK	As a doctor, I support CRUK's plain packaging campaign	Email	<p>Dear Mr Lansley,</p> <p>As a doctor, I'd like to see fewer patients suffering from smoking-related diseases in the future. One in four of all cancer deaths can be attributed to tobacco use, all of which are entirely preventable. I'm calling on the Government to bring in legislation across the UK for the plain packaging of cigarettes.</p> <p>Tobacco is a unique product, which therefore deserves unique attention in the way the Government can help control its promotion. Let's not forget that half of those who consume tobacco on a long-term basis will die of their addiction: plain packaging will give millions of children one less reason to start smoking in the first place. Research commissioned by Cancer Research UK has shown that plain</p>	167

			<p>packs would make smoking less attractive to young people and, crucially, will improve the effectiveness of the health warnings on the front and back of packs.</p> <p>When 100,000 deaths a year are due to tobacco, missing an opportunity to help reduce smoking has very serious costs.</p> <p>I have no links to the tobacco industry.</p>	
Cancer Research UK	Campaign for plain packaging of tobacco	Email	<p>The Rt Hon Andrew Lansley CBE MP</p> <p>I support Cancer Research UK's campaign for the plain packaging of tobacco products to protect our children from tobacco marketing. I do not have any links with the tobacco industry.</p>	54,948

e. I support the proposal for standardised packaging of tobacco products

Sponsor	Campaign	Type	Text	Count
NHS Stockport	I support the proposal for standardised packaging of tobacco products.	Postcard	I support the proposal for standardised packaging of tobacco products	25

f. Support Plain Packs - Protect our Children

Sponsor	Campaign	Type	Text	Count
Cancer Focus Northern Ireland	Support Plain Packs -Protect our Children	Email	<p>As a resident of Northern Ireland I would like this to be considered as a response to the document 'Consultation on standardised packaging of tobacco products'. I believe that the standardisation of tobacco packaging is an appropriate and proportional response to a major population harm in Northern Ireland. The proposals set out in the consultation document will dramatically reduce the</p>	133

			<p>opportunities available to tobacco companies to promote and target their products. Standardised tobacco packaging will make a vital contribution to public health outcomes including the following:</p> <ul style="list-style-type: none"> • Discouraging young people from taking up smoking • Encouraging people to give up smoking • Discouraging people who have quit or are trying to quit smoking from relapsing <p>Packaging is the major remaining means by which tobacco companies can make their products more appealing to smokers and attract young people. The Public Health Research Consortium report demonstrates unequivocally that standardised tobacco packaging is less attractive to consumers than branded packaging. Standardised packs will increase the effectiveness of health warnings on the packaging of tobacco products. Currently, brand logos and colours draw attention away from the health warnings. It will have no trade or competition implications, as it will apply equally to all tobacco products. The brand name will still be on the pack so retailers and consumers will still be able to recognize and choose between different brands. It will create no new opportunities for illicit trade, which responds to active anti-smuggling measures, not product design. If the UK wants to retain its position as a world leader in the implementation of the WHO Framework Convention on Tobacco Control, protecting the health of current citizens and future generations, we need to proceed with plain packaging immediately.</p>	
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g. In support of tobacco plain packs

Sponsor	Campaign	Type	Text	Count
Avaaz ⁵	In support of tobacco plain packs	Email	Respondents were invited to express their views in support of standardised and plain packaging of tobacco products.	19,863

h. Letter from Directors of Public Health in the North West of England

Sponsor	Type	Text	Count
Directors of Public Health in the North West of England	Letter with multiple signatures Directors of Public Health	This respondent identified that smoking in the North West's is a leading contributor to mortality in the region, claiming the lives of 35 people a day. In the North West, 83% of young people who try smoking do so before they are 14 and they maintain young people are aware of cigarette brands from a young age. Furthermore, they argue that there is clear and substantial body of independent academic evidence that plain, standardised cigarette packaging will reduce the number of people who start to smoke by making cigarettes less attractive, especially to children and young people, by reducing the ability of the packaging to mislead consumers about the harms of smoking and by increasing the impact of picture health warnings.	24

2. Campaigns in opposition to standardised packaging

a. Say no to plain packs

Sponsor	Campaign	Type	Text	Count
Imperial Tobacco	Say no to plain packs	Postcard	I am opposed to standardised packaging and support option 1 of the consultation: to maintain the status quo for tobacco packaging.	120,247

⁵ More information about Avaaz is at: <http://www.avaaz.org/en/about.php>

b. Hands off our packs

Sponsor	Campaign	Type	Text	Count
FOREST ⁶	Hands off our packs	Postcard	The Government has launched a public consultation on whether the UK should adopt 'plain' packaging of tobacco products. If you oppose plain packaging please enter your details below. We will submit the information to the consultation and let the Government know that you are against this measure.	55,201
FOREST	Hands off our packs	Petition	The Government has launched a public consultation on whether the UK should adopt "plain" packaging of tobacco products. If you oppose plain packaging please enter your details below. We will submit the information to the consultation and let the Government know that you are against this measure.	214,653

c. Plain Nonsense

Sponsor	Campaign	Type	Text	Count
Scottish Wholesale Association	Plain Nonsense	Postcard	<p>I wish to register my opposition to the standardised packaging proposals for tobacco products. I endorse Option 1 (no change) of the consultation, because:</p> <ul style="list-style-type: none"> • No evidence: there is no credible evidence that plain packaging will have an impact on smoking rates • Illicit Trade: plain packaging would be a boost to smugglers and counterfeiters, taking business away from legitimate shops • Confused retailers: if every product looks the same it will be impossible to serve customers efficiently 	2,865

⁶ Freedom Organisation for the Right to Enjoy Smoking Tobacco. More information is at: www.forest.org.uk

			<ul style="list-style-type: none"> Confused Customers: customers should be free to choose the products they want without difficulty 	
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d. No to “plain” packs for cigars and pipe tobacco

Sponsor	Campaign	Type	Text	Count
Association of Independent Tobacco Specialists (AITS) ⁷	No to “plain” packs for cigars and pipe tobacco	Postcard	<p>Cigars, Pipe Tobaccos and Specialist Tobacconists. I am opposed to Standardised Packaging for Cigars & Pipe Tobaccos because:</p> <ul style="list-style-type: none"> There are so many varieties that manufacturers would have to cut back on choice, They would never be able to find my product in the Specialist Tobacconists I visit, There is no need because they do no appeal to children or young people, They would be easy to counterfeit It would make people buy abroad, or on foreign internet sites, and by-pass legitimate British Specialist Tobacconists. 	2,017
Association of Independent Tobacco Specialists (AITS)	No to “plain” packs for cigars and pipe tobacco	Email	<p>Cigars, Pipe Tobaccos and Specialist Tobacconists. I am opposed to Standardised Packaging for Cigars and Pipe Tobaccos because:</p> <ul style="list-style-type: none"> There are so many varieties that manufacturers would have to cut back on choice, They would never be able to find my product in the Specialist Tobacconist I visit, There is no need because they do not appeal to children or young people, They would be easy to counterfeit, It would make people buy abroad, or on foreign internet sites, and by-pass legitimate British Specialist 	1,182

⁷ AITS is funded by its members, who are retailers of specialist tobacco products and small companies that supply these retailers.

			Tobacconists. Any further comments Name of my Specialist Tobacconist	
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e. Caution. Plain tobacco packaging will seriously damage UK jobs

Sponsor	Campaign	Type	Text	Count
Parkside Flexibles Group	Caution. Plain tobacco packaging will seriously damage UK jobs	Postcard	<p>I am employed by a supplier to the Tobacco and associated industries plus other sectors. I do not agree with standardised packaging of tobacco products because I believe that:</p> <ul style="list-style-type: none"> • A ban on the use of branding, logos or colours on packs would lead to an increase in the illicit trade in tobacco which in turn could become more attractive and accessible to young people. • There is no credible evidence that unbranded packs will prevent or reduce youth smoking and there are better alternatives such as significantly increased investment in education programmes • The proposals are therefore a threat to thousands of well paid and highly skilled UK jobs and to investment in the packaging and tobacco sectors. <p>I therefore wish to register my strong opposition to the current proposals in this regard and would request that the information and views supplied on this form be sent to the Department of Health on my behalf</p>	196

f. Plain packaging of tobacco products: caution UK jobs at risk

Sponsor	Campaign	Type	Text	Count
Unite & GMB	Plain packaging of tobacco products: caution UK jobs at risk	Postcard	<p>I work in the tobacco/print and packaging industry in the UK and wish to respond to the UK consultation on tobacco packaging. I do not agree with standardised packaging of tobacco products because I believe that:</p> <ul style="list-style-type: none"> • A ban on the use of branding, logos or colours on packs would lead to an increase in the illicit trade in tobacco which in turn could become more attractive and accessible to young people. • There is no credible evidence that unbranded packs will prevent or reduce youth smoking and there are better alternatives such as significantly increased investment in education programmes • The proposals are therefore a threat to thousands of well paid and highly skilled UK jobs and to investment in the packaging and tobacco sectors. <p>I therefore wish to register my strong opposition to the current proposals in this regard and would request that the information and views supplied on this form be sent to the Department of Health on my behalf.</p>	2,202

g. No to “plain” packs

Sponsor	Campaign	Type	Text	Count
Weidenhammer Packaging Group	No to “plain” packs	Postcard	<p>I am employed and/or have an interest in the packaging sector and wish to respond to the UK consultation on the tobacco packaging.</p> <p>I am opposed to ‘standardised’ packaging and support Option 1 of the consultation, which is to leave alone and maintain the</p>	869

			<p>status quo for tobacco packaging.</p> <p>I do not agree with standardised packaging of tobacco products because I believe –</p> <ul style="list-style-type: none"> • The elimination of logos and branding would lead to an increase in counterfeit and smuggled tobacco products. • There is no evidence that plain packaging will reduce youth smoking or general smoking habits • The proposals will be a threat to the employment of many highly skilled jobs and to future investment in the printing and packaging manufacturing industry 	
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h. Say “No” to standardised packaging

Sponsor	Campaign	Type	Text	Count
Chesapeake Branded Packaging	Say “No” to standardised packaging	Postcard	<p>I work for Chesapeake Branded Packaging, a major supplier of packaging into large blue chip companies in the Alcoholic Drinks, Food, Confectionary and Tobacco markets.</p> <p>I work at our facility, one of two factories in the UK employing over 100 people dedicated to supplying specialist packaging for the tobacco market.</p> <p>I am writing to express my concern over the consultation on Plain Packaging:</p> <ul style="list-style-type: none"> • As a specialist packaging convertor I know that Plain Packaging will make tobacco packaging much easier to copy and lead to an increase in counterfeit and smuggled product. • This reduction in UK manufactured legitimate packaging could be put at risk jobs at our two factories and many other companies/employees in the UK supply chain. • The consumer’s safety will be at risk, as counterfeit packaging is not subject to the regulations and rigorous testing legitimate packaging is. • Plain Packaging, through counterfeit and smuggled product, will further increase the significant loss of tax revenue for the UK which currently stands at of £3.1bn per year 	62

Chesapeake Branded Packaging	Say "No" to standardised packaging	Email	<p>I work for Chesapeake a multinational packaging company which has two factories in the UK dedicated to tobacco packaging. My concerns on standardised packaging are:</p> <p>Standardised Packaging will make copying legitimate packs much simpler and lead to an increase in the amount of counterfeit and smuggled product brought into the UK. This:</p> <ul style="list-style-type: none"> • Means a greater loss of tax revenue for the UK which is already at £3.1 billion • Threatens jobs in the UK, where there are over 72,000 people employed in the Tobacco Supply Chain <p>Counterfeit or smuggled packs puts at risk the health of the consumer. Legitimate packaging products are tightly regulated so that the consumer is not at risk from contaminated materials.</p> <p>The tobacco Display ban will cover all shops in the UK by 2015, shouldn't we see the evidence of this legislation before introducing further unnecessary, untested legislation.</p>	17
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i. Asian Marketing Group Initiative Untitled campaign

Sponsor	Campaign	Type	Text	Count
Asian Marketing Group Initiative, with support for the campaign provided by Philip Morris Ltd.	Untitled campaign	Postcard	I am responding in opposition to the proposed legislation on the standardisation of tobacco packaging. Small retail businesses like mine are already struggling because of unnecessary and ineffective regulations. I believe plain packaging is another flawed regulation which will only make the problem worse.	898

j. Benkert Staff Petition

Sponsor	Campaign	Type	Text	Count
Benkert Group ⁸	Benkert Group Staff Petition	Petition signed by employees of Benkert Group	<p>We support the Company’s response to the consultation dated 17th May 2012 (attached).</p> <p>Our opposition to the proposed changes to tobacco packaging is for the following reasons:</p> <ul style="list-style-type: none"> • There is no reliable evidence to suggest that this would reduce smoking • They would facilitate counterfeiting and encourage an increase in crime • Cigarettes would become less regulated, more harmful to smokers and more available to young persons • Government revenue would be reduced • Jobs would be lost throughout the supply chain <p>We believe that the unfortunate consequences far outweigh any perceived benefits.</p>	131

k. No to “plain” packs

Sponsor	Campaign	Type	Text	Count
Tobacco Retailers Alliance ⁹	No to “plain” packs	Postcard	I am a retailer who sells tobacco. I am opposed to ‘standardised’ packaging and support option 1 of the consultation: to maintain the status quo for tobacco packaging. Plain packaging would:	26,530

⁸ Benkert Group is a company that produces tipping papers for cigarettes. Information about the Benkert Group is at: <http://www.benkert-group.com>

⁹ According to its website, Tobacco Retailers Alliance (TRA) is funded by the Tobacco Manufacturers’ Association through its member companies - British American Tobacco, Imperial Tobacco Limited and Gallaher Limited (a member of the Japan Tobacco Group of Companies). Information about the TRA is at: <http://www.tobaccoretailersalliance.org.uk>

			<ul style="list-style-type: none"> • Fuel the black market in counterfeit and smuggled tobacco • Make my customers focus more on price and affect my turnover • Increase my transaction times and impact my customer service • Be yet another burden on my shop in addition to the tobacco display ban. 	
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I. Multiple letters based on a variation of a standard letter

Sponsor	Type	Text	Count
Not known	Multiple letters based on a variation of a standard letter	<p>Responses from small retailers identified a range of concerns, including:</p> <p>a. Issues relating to running the shop:</p> <ul style="list-style-type: none"> • There have already been recent changes to the storage unit, which had cost implications and are sufficient • Due to VAT increases, retailers are under increased pressure and feel unsupported by the Government • The policy will lead to increased time to serve customers, queues and customer dissatisfaction • Increases in opportunistic thefts, due shop to assistants spending longer periods picking packs • Tobacco contributes heavily to business turnover and any reduction in turnover would put pressure on business viability • With the removal of branding, manufacturers would compete on price and therefore customers could opt for cheaper alternatives. Ultimately, this could contribute to reducing turnover and viability of the business <p>b. Concern about standardised packaging:</p> <ul style="list-style-type: none"> • The policy would lead to more smuggled, duty free and counterfeit tobacco products on the black market • The current warnings are sufficient to deliver public health messages • Due to the effects on small business, standardised packaging will lead to less revenue to the Treasury 	561

		<p>c. Other options are available:</p> <ul style="list-style-type: none"> • The Government should adopt a ‘wait and see’ approach to see how the standardised packaging affects retailers in other countries • Price is a more effective strategy to prevent the uptake of smoking by young people 	
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m. Letters from members of the NFRN

Sponsor	Type	Text	Count
National Federation of Retail Newsagents (NRFN)	Letters	<p>These retailers, who are members of the NRFN, cited a range of concerns about the implications of introducing standardised packaging, including:</p> <ul style="list-style-type: none"> • There is no empirical evidence to support the policy ambitions around health • Have a detrimental impact on business • Lead to increases in the illicit market • Increase transaction times • Lead to opportunistic thefts while the shop assistant is distracted <p>A number of suggestions and possible alternatives to standardised packaging were provided, including:</p> <ul style="list-style-type: none"> • The Government should develop policy using the evidence base • Legislate to make proxy purchases illegal • Increase the fines and sentences available to courts, to tackle the illicit market • Provide ring-fenced funding to HMRC and Trading Standards to target the illicit market • Restore and formalise funding to PASS • Endorse ID card schemes approved by PASS, including Citizencard. 	6

n. Letter from former police officers

Sponsor	Type	Text	Count
Not known	Letter with multiple signatures of former police officers	The former police officers that signed the letter believe that serious organised criminals would benefit from introducing standardised packaging. Specifically, they are concerned that standardised packaging would make it easier for criminals to counterfeit tobacco products, causing the illicit market to grow. They were also concerned that these effects would further pressure on already stretched law enforcement agencies.	25

o. Letter signed by Members of Parliament

Sponsor	Type	Text	Count
Letter was initiated by Ian Paisley MP	Letter with multiple signatures from Members of Parliament	<p>The Members of Parliament that signed this letter expressed concerns about standardised packaging of tobacco, and provided the following comments:</p> <ul style="list-style-type: none"> • There is no reliable evidence that plain packaging will have public health benefits • The proposal will be a “smugglers charter”, making tobacco products more simple to counterfeit, leading to further losses to the treasury • The policy would lead to direct job losses in the tobacco sector and considerable losses throughout the supply chain • It is important that products are afforded basic commercial freedoms and the removal of branding would infringe fundamental legal rights, damage principles around intellectual property and set a precedent for the future of commercial free speech • Current measures are proportionate and there are unintended consequences which need to be fully addressed <p>The letter also suggested that in place of standardised packaging, guidance and support should be provided to retailers to better prevent tobacco sales to under people under 18 years of age.</p>	51

p. Letters from employees of the packaging industry

Sponsor	Type	Text	Count
Not known	Identical letters (signed, with name and address added) from people who identifies themselves as employees of the packaging industry	<p>A number of employees of the packaging industry sent identical letters, in which they set out that they believe:</p> <ul style="list-style-type: none"> • Reducing sales of packaging products for the tobacco industry would put jobs at risk • There would be widespread economic impact on the design, graphics, print and packaging industries • The UK would get a bad reputation for excessive regulation and not protecting the rights of companies with valuable brands • Sales of counterfeit tobacco products would increase and be easier to copy • Plain packaging would not lead to less smoking, as consumers are already informed about the health risks • The retail display ban already prevents tobacco products from being on public view • Cigarette manufacturers would be left to compete on price and this would lead to higher rates of smoking • Previous tobacco control measures have failed to impact on smoking prevalence and additional measures should be informed by a rigorous evidence base 	175

Appendix D

Names of businesses and organisations that provided detailed responses to the consultation

The following businesses and organisations responded to the consultation. This Annex replicates the information provided by consultation respondents.

To protect confidentiality, we have not included the details of consultation respondents that:

- requested that their details be withheld from publication in this report; or
- indicated that they were replying on behalf of a business or organisation but only provided their own name.

1. Businesses:

Business	Type of business	Further information provided by the respondent about the business, where “other” was selected
A G Parfetts & Sons Ltd	Wholesale tobacco seller	
Abbey News, Waltham Abbey	Tobacco retailer (convenience store)	
Abdul Majid & Son Ltd	Tobacco retailer (convenience store)	
Adairs Waterside	Wholesale tobacco seller	
Agroindustiras Laepe SA	Other	Trade in cigarettes and provision of services related to cigarette vending machines.
Ancor Tobacco Packaging	Other	
Amit Patel	Tobacco retailer (convenience store)	
API Group	Other	Manufacturer of foils, films and laminated materials for tobacco products.
Arcor (Germany)	Other	Can manufacturer for tobacco products.

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Arken-Pop International	Other	Manufacturers of in-store display in particular back of bar display units.
Aviemore News	Tobacco retailer (convenience store)	
B S Heera	Tobacco retailer (supermarket)	
Barford Village Shop, Warwickshire	Tobacco retailer (other type of shop or business)	
Beddards Ltd	Tobacco retailer (other type of shop or business)	
Benkert UK Ltd	Other	
Best One, Chepstow	Tobacco retailer (convenience store)	
Bestway (Holdings) Ltd	Wholesale tobacco seller	
BG Benton Ltd	Other	
British American Tobacco UK Limited	Tobacco manufacturer	
C In C Retail Ltd	Tobacco retailer (convenience store)	
C.Gars Limited	Specialist tobacconist	
Can Star (USA)	Wholesale tobacco seller	
Cannington News	Tobacco retailer (other type of shop or business)	
Canon Pyon PO & Stores	Tobacco retailer (convenience store)	
Caseys Vending Ltd	Other	
Castleton News, Rochdale	Tobacco retailer (convenience store)	
Chesapeake Ltd	Other	

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Clipper Logistics Group Limited	Other	Logistics company supplying services to the tobacco industry for over 20 years, including warehousing operations, order picking, handling trade returns, repacking operations and stock destruction. In addition we have delivery operations covering all areas of the United Kingdom, from large supermarket distribution centres through to small corner shops and tobacconists.
Cononley Post Office	Tobacco retailer (convenience store)	
Convenience Store, 71 The Green, Norton, Stockton on Tees	Tobacco retailer (convenience store)	
Convenience Store, West Sussex	Other	Business media, representing convenience store retailers.
Crisp Installs Ltd	Other	
Crockers Kiosks	Tobacco retailer (convenience store)	
CSR Solutions (Litter Icon on Packs)	Other	
CTN Stores	Tobacco retailer (convenience store)	
D-MYST The Agency	Other	
David Jones Design Limited	Other	Graphic design and branding agency - one of our clients is JTI.
Davidoff of Geneva	Other	Trade with cigarettes and provision of services related to cigarette vending machines.
Dr Fit	Other	Health and fitness.
Dragon Rouge (France)	Other	Dragon Rouge is a global design and innovation business and has been involved in the tobacco industry for 10 years (brand strategy, brand design, communication and packaging).
E. Burkitt Ltd	Specialist tobacconist	
East-Barkwith Post-Office	Other	Sub Post-Office (rural).

Elie Newsagents, Fife	Tobacco retailer (other type of shop or business)	
Farwells	Tobacco retailer (convenience store)	
Findlay Stewart, Glasgow	Tobacco retailer (convenience store)	
Focke & Co	Other	Packaging.
Fontmell Magna Village Shop	Tobacco retailer (other type of shop or business)	
Fox Trading (Jersey)	Other	Tobacco importer.
Frogmore Stores Ltd	Tobacco retailer (convenience store)	
G.D. (Italy)	Other	Supplier of high-technology machinery for cigarette making and packing, filter production, other tobacco products, and special products.
Gawith Hoggarth TT Ltd	Other	Gawith Hoggarth is a privately owned importer and distributor of tobacco products. The company also blends its own pipe and hand-rolling tobaccos.
George Hammond PLC	Tobacco retailer (other type of shop or business)	
Giles Morrell, Cleobury Mortimer	Tobacco retailer (convenience store)	
Good News, Hitchin	Tobacco retailer (other type of shop or business)	
Gordon's Newsagent, Manchester	Tobacco retailer (other type of shop or business)	
Greg Casey, Wirral	Tobacco retailer (other type of shop or business)	
Habanos, S.A (Cuba)	Other	HABANOS, S.A. is a Cuban cigar enterprise in charge of the exclusive distribution of Habanos worldwide.
Harry Goraya, Gravesend	Tobacco retailer (convenience store)	

Heintz van Landewyck (Luxemburg)	Other	Privately owned exporter of tobacco products to the UK.
Hoffmann Neopac AG (Switzerland)	Other	Packaging producer.
Houghton Trading	Tobacco retailer (convenience store)	
Hunters & Frankau Ltd	Other	Importer and distributor of cigars.
Hunters Quay	Tobacco retailer (convenience store)	
Ian Y. Macintyre, Argyll	Tobacco retailer (other type of shop or business)	
Iggesund Paperboard (Workington) Ltd	Other	Paperboard manufacturer.
Ignis Ltd	Other	We are an independent creative agency based in Fulham, with a long-standing supplier relationship with JTI.
Imperial Tobacco	Tobacco manufacturer	
Institute of Practitioners in Advertising	Other	The IPA is the professional body for advertising, media and marketing communications agencies based in the United Kingdom.
J W Filshill Ltd	Wholesale tobacco seller	
J. Cortes	Tobacco manufacturer	
Jags Sanghera, Middlesex	Tobacco manufacturer	
Japan Tobacco International (JTI)	Tobacco manufacturer	
Jayanti Valji, Bolton	Tobacco retailer (convenience store)	
Jays Convenience Store, Birmingham	Tobacco retailer (convenience store)	
John Gunstone, Salcombe, Devon	Tobacco retailer (other type of shop or business)	
John Hollingsworth & Son Ltd	Specialist tobacconist	

John Warren, Belfast	Tobacco retailer (convenience store)	
Johnny's Tobacconist, Newquay	Specialist tobacconist	
Jonathan Stanway, Prestatyn	Tobacco retailer (convenience store)	
Julian Norris, Weston-super-mare	Tobacco retailer (convenience store)	
Karelia Tobacco Company (UK) Ltd	Not Answered	Privately owned importer and distributor of tobacco products.
Ken Mc Farland, Co Armagh	Tobacco retailer (convenience store)	
Kieran Kerr, Berkeley Beverborne, Worcester	Tobacco manufacturer	
Kieron Penrose, Cheltenham	Other	Business owner and entrepreneur.
Kilrea Service Station Ltd	Tobacco retailer (convenience store)	
Kinniburgh, Greenock	Tobacco retailer (convenience store)	
KKInstallations	Other	Point of sale installation company.
Lee Evans, Blackpool	Tobacco retailer (convenience store)	
Level Stores, Flintshire	Tobacco retailer (convenience store)	
Limes Service Stn, Manchester	Tobacco retailer (convenience store)	
Lindale Post Office	Tobacco retailer (convenience store)	
Lindsay Hodges, Machynlleth	Tobacco retailer (convenience store)	
LMC Design Limited	Other	Graphic design including packaging.
Lorfords	Specialist tobacconist	

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Lynks, Hessele, East Yorkshire	Tobacco retailer (convenience store)	
Malcolm Dobson, Darlington	Tobacco retailer (convenience store)	
Manifatture Sigaro Toscano S.p.A. (Italy)	Tobacco manufacturer	Privately manufacturer of tobacco products: Manifatture Sigaro Toscano S.p.A.
Maple Street Stores, Lincoln	Tobacco retailer (other type of shop or business)	Old-fashioned corner shop servicing wide range of needs to a small neighbourhood.
Mark Caulfield, Essex	Tobacco retailer (convenience store)	
Mark Foster, Fareham	Other	We are a packaging company for the tobacco industry.
Mars Chocolate UK Ltd	Other	
Merseyrail	Tobacco retailer (other type of shop or business)	
Michael O'Connor, Werrington Village	Tobacco retailer (other type of shop or business)	
Mike Dixon, Brighton	Retailer not selling tobacco products	
Monitor (Romania)	Other	<p>Founded in 1999, MONITOR is a Romania-based business consulting services company covering mainly the Central-Eastern Europe area. We serve our clients on a diversified mix of issues related to enhancing competitiveness and excellence.</p> <p>Our work falls mostly into the field of Competitive Strategy, Marketing Strategy, Corporate Strategy, Interim management on Corporate Affairs, Reputation Management, Organizational Effectiveness and Coaching and Mentoring.</p>
Morrisons PLC	Tobacco retailer (supermarket)	
Natural Ltd	Tobacco retailer (convenience store)	
Neil Edge, Portishead	Tobacco manufacturer	

News on the Wharf, East India Dock, London	Tobacco retailer (convenience store)	
Newscaster, Doncaster	Tobacco retailer (other type of shop or business)	Newsagents.
Newtrade Publishing	Other	
Nirav Patel, Croydon	Tobacco retailer (convenience store)	
NISA Local, North Lincs	Tobacco retailer (convenience store)	
Nude Brand Consulting	Other	Graphic design agency.
Oettinger Davidoff Group	Other	Trade in cigarettes and provision of services related to cigarette vending machines.
Oettinger Imex AG	Other	Trade in cigarettes and provision of services related to cigarette vending machines.
Ogilvy	Other	Advertising agency.
One One Two Wines	Tobacco retailer (other type of shop or business)	
Overton Corner Shop, Whitchurch	Tobacco retailer (other type of shop or business)	
Palmer and Harvey	Wholesale tobacco seller	
Papierfabrik Carl Lenz GmbH & Co. KG (Germany)	Other	Manufacturer of core board for packaging of consumer products (especially composite cans).
Path	Other	Graphic and structural packaging design and innovation consultancy.
Paul Bros	Tobacco retailer (convenience store)	
Paul Green, Leeds	Specialist tobacconist	
Peter Laurence, Chelmsford	Tobacco manufacturer	
Peter Silley, Paignton	Specialist tobacconist	

Philip Morris Ltd	Tobacco manufacturer	
Phoenix Stores, St Austell	Tobacco retailer (convenience store)	
Post Office, Greenodd, Cumbria	Tobacco retailer (convenience store)	
Promopack Digital Studies	Other	
Quinns Off Licence, Colne, Lancashire	Tobacco retailer (convenience store)	
R Malhotra	Tobacco retailer (convenience store)	
Rav Garcha, Smethwick	Tobacco retailer (convenience store)	
Richard Blakeley, Staithe	Tobacco retailer (convenience store)	
Richard Tipper, Bishopsteignton	Tobacco retailer (convenience store)	
Ritmeester Cigars UK Ltd	Other	Cigar manufacturer, importer and distributor
Robert McGregor, Basingstoke	Tobacco retailer (convenience store)	
S patel, Wimbledon	Tobacco retailer (convenience store)	
Scandinavian Tobacco Group UK Ltd	Other	UK limited company
Schur Flexible Benelux BV	Other	
Shahid Razzaq, Blantyre	Tobacco retailer (convenience store)	
Shakila Imran, East Lothian	Tobacco retailer (convenience store)	
SICPA UK	Other	
Simon Dodds, Ambleside	Tobacco retailer (convenience store)	

Southwell Green Service Station	Tobacco retailer (convenience store)	
Spanish Confederation Of Employers and Industries (CEOE)	Other	<p>The Spanish Confederation of Employers and Industries (CEOE), founded in 1977, is the major representative institution of the Spanish business community.</p> <p>CEOE represents the interests of 1.2 million private companies in all sectors (agriculture, industry and services), whose voluntary affiliation to the CEOE is channelled through 230 regional and trade organizations and 2,000 primary associations.</p> <p>The specific interests of smaller firms are represented by the Spanish Confederation of Small and, Medium-Sized companies Enterprises (CEPYME), a national organization which is member of the CEOE.</p>
Spanswick	Other	<p>Designer of cancer treatment equipment. Presnet products on market for rectal and breast treatment.</p>
Stephen Brunning, Torpoint	Specialist tobacconist	
Stephen Watt, Aberdeen	Tobacco retailer (convenience store)	
Steve Chudy, Buxton	Tobacco retailer (other type of shop or business)	
Sunnyhill News, Derby	Tobacco retailer (other type of shop or business)	
Tabac World Limited	Other	<p>Privately owned importer and distributor of specialist tobacco products.</p>
Tabidon Holding Inc	Other	<p>Trade in cigarettes and provision of services related to cigarette vending machines.</p>
Taylor's, Bretonside	Tobacco retailer (convenience store)	
Tesco Ilkley Express	Tobacco retailer (convenience store)	

The Maxim Design Group	Other	Designer and manufacturer of retail display.
The Pipe Shop, Edinburgh	Specialist tobacconist	
The Tobacconist	Specialist tobacconist	Retail representative organisation.
Tilling Green News	Tobacco retailer (other type of shop or business)	
Toll Bar Post Office & General Store, Doncaster	Tobacco retailer (convenience store)	
Tomtom Cigars	Specialist tobacconist	
Tor Imports Ltd	Other	Tor Imports is a small, privately owned importer and distributor of niche tobacco products, such as handmade cigars, pipe tobaccos and smoking accessories.
Tri-G, Warrington	Tobacco retailer (convenience store)	
Trierenberg Holding Ag	Other	
V B Jassal, Newcastle Upon Tyne	Tobacco retailer (convenience store)	
Victoria Bassett, Weymouth	Tobacco retailer (convenience store)	
Village Stores, Plumley	Tobacco retailer (convenience store)	
Weidenhammer Packaging Group	Other	Manufacturer of packaging materials for the tobacco sector.
Whitehouse Retail Ltd	Tobacco retailer (convenience store)	
Zentralverband der Deutschen Werbewirtschaft (ZAW)	Other	German Advertising Federation.
Zopag AG	Other	Trade with cigarettes and provision of services related to cigarette vending machines.

2. Organisations:

Organisation	Type of organisation	Further information provided by the respondent about the organisation, where “other” was selected
3 Towns Partnership	Local Authority	
4 Together Partnership	Other	
Abbey Hulton Health Centre (Stoke On Trent)	Local Tobacco Control Alliance	
Aberlour Childcare Trust	Other	Children's charity.
Action Cancer (Belfast)	Other	A health charity working at a regional level (Northern Ireland).
Action on Smoking and Health (ASH)	Health Charity/NGO (Working At National Level)	
Action on Smoking and Health (ASH) Northern Ireland, Cancer Focus Northern Ireland	Health Charity/NGO (Working At National Level)	
Adam Smith Institute	Other	Think tank.
Addenbrookes Hospital	Local Tobacco Control Alliance	
Addiction Faculty Royal College of Psychiatrists	Other	Royal College of Psychiatrists Addictions Executive Committee.
Ailsa Hospital	NHS Organisation	
Alegro Foundation (Romania)	Other	
Alliance Party of Northern Ireland	Other	
Antrim Borough Council	Local Authority	

Apram	Other	APRAM (Association of Trade Marks and Designs Rights Practitioners) is an international Association for French-speaking specialists in industrial and intellectual property, in particular trademarks and designs.
Ards Borough Council	Local Authority	Local authority and local tobacco control alliance.
Argyll & Bute Council, Trading Standards Section	Local Authority Trading Standards Or Regulatory Services Department	
ASH Australia	Health Charity/NGO (Working At National Level)	
ASH Cymru/Ash Wales	Health Charity/NGO (Working At National Level)	
ASH Scotland	Other	
Ashford Borough Council	Local Authority	
Asian Trader (Asian Media and Marketing Group)	Retail Representative Organisation	<i>Asian Trader</i> represents over 48,000 retailers (over 200,000 readers) across the convenience and impulse channel (C&I) in the UK. The C&I channel includes newsagents, off-licenses, forecourts and convenience stores across the independent and symbol group estate.
ASIPI	Other Type Of Business Representative Organisation	
Association of Chartered Physiotherapists inRespiratory Care	Other	Professional organisation.
Association of Convenience Stores	Retail Representative Organisation	
Association of Directors of Public Health	Other	Association of Directors of Public Health is the representative organisation for Directors of Public Health (UK).
Association of North East Councils	Local Authority	

Atherton Children's Centre	Other	
Australian Council on Smoking & Health	Other	
Ballymena Borough Council	Local Authority	
Banbridge District Council	Local Authority	
BASCAP	Other	Business Action to Stop Counterfeiting and Piracy (BASCAP), an initiative of the International Chamber of Commerce (ICC).
Bath & North East Somerset Council	Local Authority	
Bedfordshire NHS	NHS Organisation	
Bedfordshire Tobacco Free Alliance	Local Tobacco Control Alliance	
Belfast City Council	Local Authority	
Bexley NHS	NHS Organisation	
Bishop Auckland and Shildon Aap	Local Authority	
Black Country Partnership, NHS Foundation Trust	NHS Organisation	
Blackburn Council	NHS Organisation	
Blackpool Clinical Commissioning Group	NHS Organisation	
Blackpool Council	Local Authority	
Blackpool Health Scrutiny Committee	Other	
Blackpool Teaching Hospitals NHS Foundation Trust	NHS Organisation	
Borough of Poole Council	Local Authority	

Bristol City Council	Local Authority	
Bristol NHS	Local Tobacco Control Alliance	
British Association for the Study of Community Dentistry (BASCD)	Health Charity/NGO (Working At National Level)	
British Brands Group	Other Type Of Business Representative Organisation	
British Dental Health Foundation	Health Charity/NGO (Working At National Level)	
British Heart Foundation	Health Charity/NGO (Working At National Level)	
British Lung Foundation	Health Charity/NGO (Working At National Level)	
British Lung Foundation Northern Ireland	Health Charity/NGO (Working At National Level)	
British Lung Foundation Scotland	Health Charity/NGO (Working At National Level)	
British Lung Foundation Wales	Health Charity/NGO (Working At National Level)	
British Medical Association	Other	
British Medical Association Northern Ireland	Health Charity/NGO (Working At National Level)	
British Retail Consortium	Retail Representative Organisation	
Buckinghamshire County Council Youth Cabinet	Other	
Buckinghamshire Healthcare	NHS Organisation	
Burnley Borough Council	Local Authority	

Bury Tobacco Alliance	Local Tobacco Control Alliance	
Business Federation Luxembourg	Other Type Of Business Representative Organisation	
Canadian Cancer Society	Health Charity/NGO (Working At National Level)	
Cancer Appeal	Health Charity/NGO (Working At National Level)	
Cancer Council Western Australia	Other	
Cancer Focus Northern Ireland	Health Charity/NGO (Working At National Level)	
Cancer Research UK	Health Charity/NGO (Working At National Level)	
CBI	Other Type Of Business Representative Organisation	
CEHOG, Omagh Council	Other Type Of Business Representative Organisation	CEHOG is a body with Environmental Health Representatives from the 26 District Councils in Northern Ireland, the four Group Environmental Health Committees, the CIEH (NI) and DHSSPS.
Center for Risk and Economic Analysis of Terrorism Events, University of Southern California	University Or Research Organisation	
Chartered Institute of Environmental Health (CIEH) Kent & Medway Branch of Public Health Technical Working Group	Other	Chartered Institute of Environmental Health (CIEH) Kent & Medway Branch of Public Health Technical Working Group
Chartered Institute of Patent Attorneys – CIPA	Other	The Chartered Institute of Patent Attorneys (CIPA) is the representative body for patent attorneys in the United Kingdom. The membership includes 1,800 registered patent attorneys, of which 1,570 are also European Patent Attorneys (EPAs)

Cheshire and Merseyside Public Health Network (CHAMPS)	Local Authority	
Cheshire and Merseyside Tobacco Control Alliance	NHS Organisation	
Cheshire East Council	Local Authority	
Cheshire Police Authority	Other	
Cheshire West and Chester Council	NHS Organisation	
Chester-Le-Street and District Area Action Partnership	Local Authority	
Children in Scotland	Other	Children in Scotland is the national umbrella agency for organisations and professionals working with and for children, young people and their families.
Children inWales	Other	NGO.
City of Lincoln Council	Local Authority	
Cleveland Fire Brigade	Other	
Clinical Commissioning Group, NHS North Somerset	NHS Organisation	
Colchester and Tendring NHS Stop Smoking Service	NHS Organisation	Whilst we are a social enterprise (Anglia Community Enterprise) we are commissioned to provide local stop smoking services.
Coley Porter Bell	Retail Representative Organisation	
Cookstown District Council	Local Tobacco Control Alliance	
County Durham & Darlington Foundation Trust	NHS Organisation	

County Durham and Darlington Fire and Rescue	Other	
County Durham and Darlington NHS Foundation Trust	NHS Organisation	
County Durham Health and Wellbeing Partnership (Sedgefield Health Network)	Local Authority	
Coventry City Council/ West Midlands Public Health Registrars	Other	West Midlands Public Health Registrars is a group comprising of all of the public health registrars working and training in the West Midlands (approx 55).
Coventry City Council and NHS Coventry	Local Tobacco Control Alliance	
Crimestoppers	Other	
Croydon Healthwatch Partners	NHS Organisation	
Cumbria Tobacco Alliance, NHS	Local Tobacco Control Alliance	
Czech Association for Branded Products	Other Type Of Business Representative Organisation	
Dalton Square Practice, Lancaster	NHS Organisation	
Darlington Council	Local Tobacco Control Alliance	
Darlington Council	Local Authority	
Department of Health & Ageing	Other	Australian Government.
Department of Public Health and Health Professionals (Welsh Government)	Other	The Welsh Pharmaceutical Committee is established to advise the Minister for Health and Social Service, the Welsh Ministers in general and Welsh Government officials, on issues pertaining to the pharmacy profession.
Derry Healthy Cities	Health Charity/NGO (Working At National Level)	

Derwent Valley Partnership	Other	
Derwentside Health Network	NHS Organisation	
Drug Science	Health Charity/NGO (Working At National Level)	
Dudley MBC	Local Authority	
Dudley Metropolitan Borough Council	Local Authority	
Dudley PCT	Local Tobacco Control Alliance	
Dudley PCT	NHS Organisation	
Durham & Chester Le Street Health Network	NHS Organisation	
Durham Council	Local Tobacco Control Alliance	
Durham County Council	Local Authority	
Durham County Council	Other	Chair of the North East Public Protection Group. Comprise the 12 Heads of Public Protection from the councils in North East England, we coordinate Environmental Health, Trading Standards and Licensing.
Durham Dales Easington and Sedgefield Clinical Commissioning Group	NHS Organisation	Durham Dales Easington and Sedgefield clinical Commissioning group (DDES CCG).
Durham Dales Health Network	Local Authority	
Ealing Stop Smoking Service	NHS Organisation	
East Durham Area Action Partnership	Local Authority	
East Lancashire Clinical Commissioning Group	NHS Organisation	

East of England Trading Standards Association	Local Authority Trading Standards Or Regulatory Services Department	
East Riding of Yorkshire Council	Local Authority	
East Sussex County Council	Local Authority	
East Sussex Fire and Rescue Service Brighton City Borough	Other	Fire and Rescue Service.
Eastleigh Borough Council	Local Authority	
Economiesuisse	Other Type Of Business Representative Organisation	Economiesuisse is the largest umbrella organisation representing the Swiss businesses. Our members are Associations from all sectors, chambers of commerce and major individual companies.
Edinburgh Pipe Club	Other	Edinburgh Pipe Club is a group for local pipe smokers to enjoy their pipes and tobacco in like-minded company.
Enagh Youth Forum	Other	Youth organisation.
Environmental Health Department, Limavady Borough Council	Other	Local Authority and local tobacco control alliance.
Ethics and Health Foundation	Health Charity/NGO (Working At National Level)	Healthy living foundation (not for profit, health promotion).
European Carton Makers Association	Other Type Of Business Representative Organisation	
European Cigar Manufacturers Association (ECMA)	Other Type Of Business Representative Organisation	
European Heart Network	Other	European health NGO
European Parliamentary Labour Party	Other	

European Respiratory Society	Other	The European Respiratory Society is a professional medical organisation with more than 12,000 members in over 100 countries across the globe representing medical and scientific experts in the field of respiratory medicine and lung science. Its mission is to alleviate suffering from respiratory disease through advocacy, research, knowledge sharing and education. Its annual congress attracts over 20,000 respiratory health professionals from all across the world. More info at www.ersnet.org
European Smoking Tobacco Association	Other	The European Smoking Tobacco Association, ESTA, represents the interests of companies manufacturing and distributing smoking tobacco products, including fine-cut tobacco, pipe tobacco, traditional nasal snuff and chewing tobaccos, as well as national trade associations representing 'smoking tobacco' products. Our members include small and medium sized companies in Europe, as well as multinational companies of which several are located in the United Kingdom. European Commission's register of interest representatives: 0138855852-93)
Faculty of Public Health - UK	Health Charity/NGO (Working At National Level)	
Fast Forward	Health Charity/NGO (Working At National Level)	
Federation of German Industries (BDI)	Other Type Of Business Representative Organisation	
Federation of Wholesale Distributors	Other Type Of Business Representative Organisation	
Fedil	Other Type Of Business Representative Organisation	
Fenland District Council	Local Authority	
Fife Council	Local Authority	
Finnish Tobacco Industries' Federation	Other Type Of Business Representative Organisation	
Fitch	Other	Design agency

Forum of Private Business	Other Type Of Business Representative Organisation	
Foundation for the Study of Infant Death	Health Charity/NGO (Working At National Level)	
Frederick Gough School	Local Authority	
Freedom Organisation For the Right To Enjoy Smoking Tobacco (FOREST)	Other	FOREST is a lobby group. We represent adults who choose to consumer tobacco and adults who are tolerant of those who choose to consume tobacco.
Freedom To Choose (Scotland)	Other	Freedom to Choose (Scotland), campaigning group on the issue of the smoking ban and related issues.
FRESH-Smoke Free North East	NHS Organisation	FRESH-Smoke Free North East was set up in May 2005 as the UK's first dedicated regional tobacco control programme.
Gateshead Council	Other	Tyne and Wear Joint Trading Standards Committee was established in 1986 to coordinate Trading Standards across the 5 Tyne and Wear councils and to support the management of our joint services.
Gateshead Council	Local Tobacco Control Alliance	
Gateshead Council	Local Authority	
Gateshead PCT	NHS Organisation	
Gateshead Youth Council	Other	Gateshead youth council is an umbrella support organisation for groups and individuals working with young people. we support Gateshead youth assembly, and elected body of young people charged with collecting and acting upon the views of young people in Gateshead and delivering these views to the appropriate decision makers.
German Cancer Research Center	University Or Research Organisation	
Global Bridges (Hosted By Mayo Clinic in the USA)	Other	Global Bridges is an international network of healthcare professionals and organizations dedicated to advancing evidence-based tobacco dependence treatment and effective tobacco control policy. Global Bridges is hosted by

		Mayo Clinic in the USA and includes several hundred members from around the world.
Greater Glasgow & Clyde NHS, Smokefree Youth Services	NHS Organisation	The group contains representatives from the NHS, trading standards and other partner agencies.
Greater Manchester & Cheshire Cancer Network	NHS Organisation	
Hampshire Fire and Rescue Service	Other	
Hartlepool Borough Council	Other	Health Scrutiny Forum, Hartlepool Borough Council.
Hartlepool Borough Council	Local Authority	Shadow Health and Wellbeing Board (LA and NHS).
Health and Partnership Scrutiny Committee, Darlington Borough Council	Local Authority	
Herefordshire Council	Local Authority Trading Standards Or Regulatory Services Department	
Hertfordshire NHS	NHS Organisation	
Homer Hill House	NHS Organisation	
Humber Alliance on Tobacco	Local Tobacco Control Alliance	

<p>Independent Scottish Specialist Tobacconists' Association (ISSTA)</p>	<p>Other Type Of Business Representative Organisation</p>	<p>The Independent Scottish Specialist Tobacconists' Association (ISSTA) - representing the small number (approx. 10) of Specialist Tobacconist business (as defined by TAPA 2002) in Scotland, including:</p> <ul style="list-style-type: none"> • The Cigar Box, Edinburgh • The Pipe Shop, Edinburgh • Robert Graham, Edinburgh • Treasurer 1874, Edinburgh • Robert Graham/Global Whiskies, Glasgow • T H Dallings, Ayr • G T Coventry, Kirkcaldy • Herbert Love, Aberdeen • Harvey's Tobacconist, Paisley • Alex Davidson's, Dunoon
<p>Institute of Directors</p>	<p>Other Type Of Business Representative Organisation</p>	
<p>Institute of Economic Affairs (IEA)</p>	<p>Other</p>	<p>DISCLAIMER: As part of its educational objectives the IEA facilitates responses to public policy consultations by academics and others. However, the views expressed, whilst generally consistent with the IEA's mission, are those of the authors and not those of the IEA (which has no corporate view), its managing Trustees, senior staff or Academic Advisory Council. If these views are quoted then we ask they are quoted as the views of the author(s).</p>
<p>Institute of Public Health in Ireland</p>	<p>Other</p>	<p>The Institute of Public Health in Ireland. The remit of the Institute of Public Health in Ireland (IPH) is to promote cooperation for public health between Northern Ireland and the Republic of Ireland in the areas of research and information, capacity building and policy advice. Our approach is to support Departments of Health and their agencies in both jurisdictions, and maximise the benefits of all-island cooperation to achieve practical benefits for people in Northern Ireland and the Republic of Ireland.</p>
<p>Intellectual Property Lawyers' Association</p>	<p>Other</p>	

Inter-American Association of Intellectual Property (ASIPI)	Other	ASIPI is a non-profit organization, established in 1964, with the purpose of bringing together professionals interested in studying, disseminating and developing intellectual property laws in America. Among its objectives are advising the governments and intergovernmental entities on matters related to the unification of the intellectual property laws, as well as encouraging relationships with related entities, such as the World Intellectual Property Organization (WIPO), the Association Internationale pour la Protection de la Propriété Intellectuelle (AIPPI), the International Trademark Association (INTA), the Fédération Internationale de Conseils en Propriété Industrielle (FICPI), the American Intellectual Property Law Association (AIPLA) and the Intellectual Property Owners Association (IPO). ASIPI is a WIPO Observer.
International Association for the Study of Lung Cancer (IASLC)	University Or Research Organisation	
International Chamber of Commerce UK	Other	International Chamber of Commerce.
International Union Against Tuberculosis and Lung Disease (France)	Other	Health charity/NGO (working at international level).
Involve North East	Other	
INWAT (Europe)	Other	NGO working at national and European levels- International Network of Women Against Tobacco (INWAT) (Europe).
Irish Cancer Society (Rachel Wright)	Health Charity/NGO (Working At National Level)	
Isle of Wight NHS	NHS Organisation	
Islington NHS Stop Smoking Service	NHS Organisation	

KCFN	Other	KCFN is one of Kent's foremost children's charities and has been working since 2004 to improve the lives of children and young people across the county.
Keep Britain Tidy	Other	An environmental charity working to improve the quality of our local environments. We run the anti-litter campaign for England and run programmes such as Eco-Schools, Blue Flag for beaches, and the Green Flag for parks to demonstrate practical action, through which we intend to promote and enhance wellbeing. Our vision is a world where people understand and actively care for the environment and each other. Our mission is to inspire and enable people to be litter-free, waste less and live more.
Kent County Council	Local Tobacco Control Alliance	
Kent County Council	Local Authority	
Kick Ash Cambridgeshire	Other	Kick Ash Cambridgeshire is a young person led smoking prevention programme supported by NHS Cambridgeshire, Cambridgeshire County Council, and Schools across Cambridegshire.
Kidz Konnekt	Other	
Knowlsey MBC	Local Authority Trading Standards Or Regulatory Services Department	
Knowsley MBC Youth Services	Local Authority	
Knowsley Metropolitan Borough Council	NHS Organisation	Knowsley Public Health Team.
Lambeth Council	Local Authority	Specifically the Health and Adult Social Care Scrutiny Sub-Committee.
Lambeth Tobacco Control Alliance	Other	A local partnership comprising of NHS, local authority, police, fire service and voluntary sector.
Lancashire County Council Trading Standards Service	Local Authority Trading Standards Or Regulatory Services Department	
Lancaster City Council	Local Authority	

Leeds and York Partnership NHS Foundation Trust	NHS Organisation	
Leeds North CCG	NHS Organisation	
Leeds Teaching Hospitals NHS Trust	NHS Organisation	
Leicester Tobacco Control Alliance	Local Tobacco Control Alliance	
Leicestershire County Council	Other	Leicestershire Health and Wellbeing Board.
Leicestershire Tobacco Control Alliance	Local Tobacco Control Alliance	
Licensing Executives Society (Britain and Ireland)	Other	Licensing Executives Society (Britain and Ireland) (“LES”) is the local chapter of Licensing Executives Society International (“LESI”). LESI is the world's leading association of technology transfer and licensing professionals, with over 11,000 members worldwide. The membership is mixed, not only geographically, but also in terms of members' backgrounds, including business people, professionals (lawyers particularly intellectual property lawyers, accountants and patent agents) in private practice and in house, and academics, drawn from a broad range of industry sectors. LES, the local chapter here, is one of the largest with approaching 500 members and its members are engaged in all the fields of activity listed above.
Link 4 Life	Other	Rochdale Boroughwide Cultural Trust trading as Link4Life.
Little Lever Children and Young People’s Centre	Other	
Liverpool City Council	Local Authority Trading Standards Or Regulatory Services Department	
Liverpool Community Health (NHS) Trust	NHS Organisation	

London Borough of Brent	Local Authority	
London Borough of Enfield	Local Tobacco Control Alliance	
London Borough of Haringey / NHS North Central London	Local Authority	
London Health Programmes	NHS Organisation	
Lord Street & Grosvenor Children's Centre	Other	
Luton Borough Council	Local Authority	
Luton Council	Local Tobacco Control Alliance	
Magherafelt District Council	Local Authority	
Manchester City Council and NHS Manchester	NHS Organisation	
Markenverband E.V., (German Brands Association)	Other Type Of Business Representative Organisation	
Maternity Matters Group of County Durham and Darlington NHS	NHS Organisation	
Medway Council	Local Authority	
Mereside Primary School & Children's Centre	Other	
Mersey Child Death and Overview Panel	NHS Organisation	
Mid Durham Area Action Partnership	Local Authority	

Middlesbrough College	Other	
Middlesbrough Council	Local Authority	
Middlesbrough Smoke Free Alliance	Local Tobacco Control Alliance	
Moyle District Council	Local Authority	
Multi-Agency Healthy Lifestyles Strategy Group, Rochdale Council	Other	This response is on behalf of a multi-agency healthy lifestyles group, whose members represent a wide range of agencies including the local authority, NHS HMR, Pennine Care, the local Pharmaceutical Committee, Link4Life (the local leisure and cultural Trust) and others.
N. Ireland Cancer Registry	University Or Research Organisation	
National Centre for Smoking Cessation & Training (NCSCT)	Other	NCSCT is a Community Interest Company.
National Children's Bureau	Other	National Children's Bureau (NCB) is a leading research and development charity working to improve the lives of children and young people, reducing the impact of inequalities. We work with children, for children to influence government policy, be a strong voice for young people and front-line professionals, and provide practical solutions on a range of social issues.
National Foundation of Young Managers - FNTM	Other	Non-governmental, not-profit organization.
National Heart Forum	Health Charity/NGO (Working At National Level)	
National Heart Foundation of Australia	University Or Research Organisation	
NECA	Other	A 3rd sector organisation in the North of England, focused on dependency, recovery and the promotion of healthy lives.

Newcastle and North Tyneside Stop Smoking Service	University Or Research Organisation	
Newcastle City Council	Other	Local Children and Young People's Strategic Partnership.
Newcastle City Council	Local Authority	
Newcastle City Council (Childrens Services)	Local Authority	
Newcastle CVS	Other	
Newry and Mourne District Council	Local Authority	
Newtownabbey Borough Council	Local Authority	
Newtrade	Other	Retail trade magazine.
NHS Airedale	NHS Organisation	
NHS Ayrshire & Arran	NHS Organisation	
NHS Blackburn With Darwen	NHS Organisation	
NHS Bournemouth & Poole, NHS Dorset, Borough of Poole, Bournemouth Borough Council, Dorset County Council, Dorchester Clinical Commissioning Group	Other	Response as a cluster from NHS and Local Authority Organisations across Bournemouth, Poole and Dorset.
NHS Bournemouth and Poole	Other	Bournemouth and Poole Shadow NHS and LA Health and Wellbeing Board.
NHS Bradford Airedale and Leeds	NHS Organisation	
NHS Brent - Health Improvement Department	Local Tobacco Control Alliance	

NHS Bristol	NHS Organisation	
NHS Buckinghamshire and Buckinghamshire County Council	Other	Buckinghamshire Health and Wellbeing Board.
NHS Cambridgeshire	NHS Organisation	
NHS Central Lancashire	NHS Organisation	
NHS Chorley and South Ribble Clinical Commissioning Group	NHS Organisation	
NHS Darlington Clinical Commissioning Group, NHS County Durham and Darlington	NHS Organisation	
NHS Derby City	NHS Organisation	
NHS Doncaster	Local Tobacco Control Alliance	
NHS Durham Dales, Easington and Sedgefield Clinical Commissioning Group (Sedgefield Health Together)	NHS Organisation	
NHS East Lancs	Local Tobacco Control Alliance	
NHS Gloucestershire	NHS Organisation	
NHS Grampian	NHS Organisation	
NHS Greater Glasgow and Clyde	NHS Organisation	
NHS Hartlepool	Local Tobacco Control Alliance	
NHS Hartlepool	NHS Organisation	From Director of Public Health (joint post) - NHS Hartlepool and Hartlepool Borough Council.
NHS Hartlepool and Stockton Clinical Commissioning Group	NHS Organisation	

NHS Hartlepool/Hartlepool Borough Council	NHS Organisation	
NHS Highland	NHS Organisation	
NHS Kent & Medway	NHS Organisation	
NHS Kirklees	NHS Organisation	
NHS Lanarkshire	NHS Organisation	Lanarkshire Tobacco Control Strategy Group & both North & South Lanarkshire Children's Services Sub Groups.
NHS ND Clinical Commissioning Group, Stanley Primary Care Centre	NHS Organisation	
NHS North Essex	NHS Organisation	
NHS North Lancashire	NHS Organisation	
NHS North Lincolnshire	NHS Organisation	
NHS Northamptonshire / Northamptonshire County Council	NHS Organisation	
NHS Nottingham City	Local Tobacco Control Alliance	
NHS Peterborough	Local Tobacco Control Alliance	
NHS Public Health, Surrey County Council	NHS Organisation	
NHS South Gloucestershire	NHS Organisation	
NHS South of Tyne and Wear	NHS Organisation	
NHS South Tyneside Clinical Commissioning Group	NHS Organisation	
NHS South West London	Local Tobacco Control Alliance	

NHS Stockport	NHS Organisation	
NHS Sussex (East Sussex)	NHS Organisation	
NHS Swindon	NHS Organisation	
NHS Tees	NHS Organisation	
NHS Wakefield District	NHS Organisation	
NHS Wakefield District	Local Tobacco Control Alliance	
NHS Warrington	NHS Organisation	
NHS Warwickshire/Warwickshire County Council	NHS Organisation	
NHS Wiltshire / Wiltshire Council	NHS Organisation	
NHS Wirral	NHS Organisation	
NHS Worcestershire	Local Tobacco Control Alliance	
	Other	Reply on behalf of the British Association for the Study of Community Dentistry (BASCD). This organisation is the specialist society for consultants, registered specialists and trainees in Dental Public Health, together with members of the wider public health workforce who are committed to population oral health and health improvement.
North Down Borough Council	Local Authority	

North East Directors of Children's Services (NEDCS)	Other	North East Directors of Children's Services (NEDCS). NEDCS is made up of the 13 Directors of Children's Services in the NE and Cumbria. It is part of the national Association of Directors of Children's Services (ADCS), the national leadership organisation in England for DCSs appointed under the provisions of the 2004 Children Act.
North East Environmental Health Group	Other	North East Environmental Health Group. This is a collaborative group of the 12 Chief EHOs in North East England. We coordinate Environmental Health and Public Health activities and share services and resources where possible.
North East Lincolnshire Care Trust and Council	NHS Organisation	And Council.
North East Public Health Specialty Registrar Group	Other	Submitted on behalf of the members of the North East Public Health Specialty Registrar Group.
North East Strategic Health Authority	NHS Organisation	North East Strategic Health Authority.
North East Trading Standards Association (NETSA)	Local Authority Trading Standards Or Regulatory Services Department	
North Somerset Council	Other	People and Communities Board.
North Somerset PCT	Other	On behalf of both NHS North Somerset and North Somerset Tobacco Alliance.
North Tyne PCT	NHS Organisation	
North Tyneside Council	Local Authority	
North Yorkshire Youth Council	Other	
Northamptonshire Fire and Rescue Service Community Protection Department	Other	

Northern Ireland Chest Heart and Stroke	Health Charity/NGO (Working At National Level)	
Northern Ireland Independent Retail Trade Association	Retail Representative Organisation	
Northumberland County Council	NHS Organisation	
Northumberland Stop Smoking Service	NHS Organisation	
Oxfordshire Smoking Advice Service	Local Tobacco Control Alliance	
Pembroke College, Cambridge University	University Or Research Organisation	
Petrol Retailers Association	Retail Representative Organisation	
Plymouth City Council	Local Authority	
Portsmouth City Council	Local Authority	
Primary Care Respiratory Society UK	Other	Professional membership organisation representing UK primary care professionals with an interest in respiratory disease.
Promarca (Switzerland)	Other Type Of Business Representative Organisation	
Property Rights Alliance (USA)	Other Type Of Business Representative Organisation	
Public Health Agency, Belfast	NHS Organisation	
Public Health Lewisham	Local Tobacco Control Alliance	
Public Health North West	NHS Organisation	
Public Health Wales	NHS Organisation	
Public Protection Service, Rochdale MBC	Local Authority Trading Standards Or Regulatory Services Department	Rochdale MBC Public Protection Service. Service includes work areas for Trading Standards, Environmental Health and Licensing.

Queen Alexandra Sixth Form College	Other	
Quit Victoria (Australia)	Other	Quit Victoria (Australia).
Quit	Health Charity/NGO (Working At National Level)	
Reading Borough Council	Local Authority	
Redcar & Cleveland Borough Council	Local Authority	
Redcar and Cleveland Department for Public Health	NHS Organisation	
Rochdale Borough Children's Trust	Other	
Rochdale Council	Local Authority	
Rochdale MBC Tobacco Free Alliance	Local Tobacco Control Alliance	
Rochdale Metropolitan Borough Council	Local Authority	
Rochdale Metropolitan Borough Council's Health Overview and Scrutiny Committee	Local Authority	
Rotherham MBC	Other	Rotherham Health and Wellbeing Board and Rotherham Health Overview and Scrutiny Commission.
Rotherham Tobacco Control Alliance	Local Tobacco Control Alliance	
Royal College of General Practitioners	Health Charity/NGO (Working At National Level)	

Royal College of Nursing (RCN)	Other	With a membership of over 400,000 registered nurses, midwives, health visitors, nursing students and health care assistants, the Royal College of Nursing (RCN) is the voice of nursing across the UK and the largest professional union of nursing staff in the world. RCN members work in a variety of hospital and community settings in the NHS and the independent and voluntary sector. The RCN promotes patient and nursing interests on a wide range of issues by working closely with the government, the UK parliaments and other national, European and international political institutions, trade unions, professional bodies and voluntary organisations.
Royal College of Paediatricians and Child Health (PCPCH)	University Or Research Organisation	
Royal College of Physicians	Other	Medical Royal College.
Royal College of Physicians of Edinburgh	Other	Royal College of Physicians of Edinburgh.
Royal National Institute for the Blind (RNIB) Campaigns	Health Charity/NGO (Working At National Level)	<p>As the largest organisation of blind and partially sighted people in the UK, RNIB is pleased to have the opportunity to respond to this consultation.</p> <p>We are a membership organisation with over 10,000 members who are blind, partially sighted or the friends and family of people with sight loss. 80 per cent of our Trustees and Assembly Members are blind or partially sighted. We encourage members to be involved in our work and regularly consult with them on government policy and their ideas for change.</p>
Rural Shops Alliance	Retail Representative Organisation	
Salford Council Trading Standards	Local Authority Trading Standards Or Regulatory Services Department	Local Authority Trading Standards or Regulatory Services Department.
Sandwell Primary Care Trust	NHS Organisation	

School Councils UK	Other	A charity that supports and promotes the existence of school councils in schools and so affords children and young people the opportunity to have a greater say over things that affect their school and wider lives, particularly in relation to their health and wellbeing.
Scotland's Commissioner for Children and Young People	Other	Public body.
Scottish Coalition on Tobacco (Scot)	Other	<p>SCOT is a campaigning coalition of 13 health and medical organisations that have a shared interest in matters relating to tobacco and health. The alliance was founded under a different name in 1999, bringing together a broad range of organisations that have joint concerns, interests, and views on taking action to reduce the harm caused by tobacco.</p> <p>Members of the coalition are: ASH Scotland, British Heart Foundation Scotland, British Lung Foundation Scotland, British Medical Association, Cancer Research UK, Chest Heart & Stroke Scotland, Macmillan Cancer Support, Royal College of Nursing, The Roy Castle Lung Cancer Foundation, Royal College of Physicians of Edinburgh, Royal College of Psychiatrists, The Stroke Association (Scotland office), and the Royal Environmental Health Institute of Scotland.</p>
Scottish Grocers Federation	Retail Representative Organisation	
Scottish Youth Parliament	Other	
SCPHRP	University Or Research Organisation	
Sefton Council (Sefton Labour Group)	Local Authority	
Sefton Maternity Services Liaison Committee	NHS Organisation	

Sefton's Children's Trust (Be Healthy Sub Group)	Local Authority	
SELC Southwark	Local Authority	
Sheffield Tobacco Control Accountable Programme Board (Local Tobacco Alliance), NHS Sheffield	Other	Response on behalf of all the following: <ul style="list-style-type: none"> • Sheffield Tobacco Control Accountable Programme Board (local Tobacco Alliance) • NHS Sheffield • Sheffield Clinical Commissioning Group • Sheffield City Council
Shropshire County PCT	NHS Organisation	
Smoke Free East of England	Other	A regional partnership comprising regional and local NHS, Local Authorities and Trading Standards.
Smoke Free Greater Manchester	NHS Organisation	
Smoke Free Newcastle	Local Tobacco Control Alliance	
Smoke Free North Tyneside Alliance	Local Tobacco Control Alliance	
Smoke Free Partnership	Other	The Smoke Free Partnership (SFP) is a strategic, independent and flexible partnership between the Cancer Research UK, European Heart Network and the European Respiratory Society. It aims to promote tobacco control advocacy and policy research at EU and national levels in collaboration with other EU health organisations and EU tobacco control networks.
Smokefree Cornwall	Local Tobacco Control Alliance	
Smokefree Devon Alliance	Local Tobacco Control Alliance	
Smokefree Hampshire & IOW, NHS Hampshire	Local Tobacco Control Alliance	
Smokefree Lincs Alliance, Lincolnshire County Council	Local Tobacco Control Alliance	

Smokefree Liverpool	Local Tobacco Control Alliance	
Smokefree London Youth Network	Other	A London wide Network of healthcare professionals who form the Smokefree Youth Network for the region.
Smokefree Nottinghamshire - Nottinghamshire's Strategic Tobacco Alliance Group	NHS Organisation	NHS and Local authority - partnership group.
Smokefree Redcar & Cleveland Alliance	NHS Organisation	
Smokefree Solihull	Local Tobacco Control Alliance	
Smokefree Somerset Alliance	Local Tobacco Control Alliance	
Smokefree South West	NHS Organisation	
Smokefree Surrey Alliance	Local Tobacco Control Alliance	
Smokefree Warwickshire	Local Tobacco Control Alliance	
Smoking inPregnancy – North of Tees Steering Group	NHS Organisation	
Smoking Interest (Tobacco Control) Research Group, Durham University	University Or Research Organisation	
Smoking Matters Service, NHS Dumfries & Galloway	NHS Organisation	
Somerset Partnership NHS Foundation Trust	Local Authority	
South Central Ambulance Service NHS Foundation Trust	NHS Organisation	

South East London Illegal Tobacco Cluster, Southwark Tobacco Alliance	Local Tobacco Control Alliance	
South Gloucestershire Council	Local Authority	
South Tees Health Improvement and Stop Smoking Service	NHS Organisation	
South Tyneside Council	Local Tobacco Control Alliance	
South Tyneside Council	Local Authority	
South Tyneside Homes	Other	South Tyneside Homes is an arms length management organisation (ALMO) created by South Tyneside Council to manage, maintain and improve its council homes and estates. It is a non-profit-making company that is 100% owned by South Tyneside Council.
South Tyneside NHS Foundation Trust	NHS Organisation	
South Tyneside Workplace Health Alliance	NHS Organisation	
Southampton City Clinical Commissioning Group, NHS Southampton	NHS Organisation	
Southern Health and Social Care Trust	NHS Organisation	
Southern Health NHS Foundation Trust	NHS Organisation	
Southwark Tobacco Alliance	NHS Organisation	
Spennymoor Area Action Partnership, Durham County Council	Local Authority	

Staffordshire Tobacco Control Alliance, Staffordshire County Council and Staffordshire NHS	Local Tobacco Control Alliance	
Stanley Area Action Partnership, Durham County Council	Local Authority	
Stockport Link	Other	
Stockport PCT	NHS Organisation	
Stockton & Hartlepool Stop Smoking Service	NHS Organisation	
Stockton-On-Tees Council	Local Authority	
Stockton-On-Tees Tobacco Control Alliance	Local Tobacco Control Alliance	
Stop Smoking Service, Cheshire and Wirral Partnership NHS Foundation Trust	NHS Organisation	
Suffolk County Council/ NHS Suffolk	Local Authority	
Sunderland Council	Local Authority	The response is submitted on behalf of the Health and Wellbeing Board of Sunderland City Council and endorsed by Leader of Sunderland City Council (as Chair of the Board).
Sunderland Teaching Primary Care Trust	NHS Organisation	
Sunderland Teaching Primary Care Trust	Local Tobacco Control Alliance	
Sure Start	Health Charity/NGO (Working At National Level)	
Surrey NHS	NHS Organisation	
SWERCOTS	Local Authority Trading Standards Or Regulatory Services Department	

Swindon Borough Council	Other	Swindon Shadow Health and Wellbeing Board.
Swindon LSCB, Swindon Borough Council	Other	Local Safeguarding Children Board.
Swindon Smokefree Alliance	Local Tobacco Control Alliance	
Taxpayers' Alliance	Other	Organisation representing tax payers.
Teenage Cancer Trust	Health Charity/NGO (Working At National Level)	
Teenage Pregnancy and Sexual Health Partnership of County Durham and Darlington	NHS Organisation	
Tees Public Health Directorate	NHS Organisation	
Teesdale Action Partnership	Other	
Teeside University	University Or Research Organisation	
Telford and Wrekin Tobacco Control Commissioning Partnership	Local Tobacco Control Alliance	
The American Council on Science and Health	University Or Research Organisation	

<p>The Anti-Counterfeiting Group</p>	<p>Other</p>	<p>The Anti-Counterfeiting Group. ACG is a not for profit trade association representing the many sectors of manufacturing industry which are under attack from product counterfeiting. Our membership consists of:</p> <p>(1) trade mark holders (individual companies and businesses), fake versions of whose products are routinely available for sale in the UK and elsewhere, and</p> <p>(2) various service providers such as lawyers, trade mark agents and product security specialists working to combat the worldwide trade in fakes.</p> <p>Currently we have 162 members, of which 86 are trade mark holders. Five of those are in the tobacco industry. Additionally, the Tobacco Manufacturers Association is a correspondent member, being a sectoral trade association rather than a manufacturer.</p>
<p>The Association of Independent Tobacco Specialists (AITS)</p>	<p>Retail Representative Organisation</p>	
<p>The Association of School and College Leaders (ASCL)</p>	<p>Other</p>	<p>Professional association of educationalists. The Association of School and College Leaders (ASCL) represents over 17,000 heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of maintained and independent schools and colleges throughout the UK. ASCL has members in more than 90 per cent of secondary schools and colleges of all types, responsible for the education of more than four million young people. This places the association in a unique position to consider this issue from the viewpoint of the leaders of secondary schools and colleges.</p>
<p>The British Psychological Society</p>	<p>Other</p>	<p>The British Psychological Society, incorporated by Royal Charter, is the learned and professional body for psychologists in the United Kingdom. We are a registered charity with a total membership of almost 50,000.</p>

The Confederation of Netherlands Industry and Employers (VNO-NCW)	Other Type Of Business Representative Organisation	
The Deborah Hutton Campaign & Cut Films	Health Charity/NGO (Working At National Level)	
The European Union Chamber of Commerce in Korea (EUCKK)	Other Type Of Business Representative Organisation	
The Gateshead Housing Company	Other	Arms length management organisation - non profit making Housing Company.
The Imported Tobacco Products Advisory Council (ITPAC)	Other	ITPAC is a trade association which represents the interests of 14 distributors of imported tobacco products in the UK. The Association's Core Members consist mainly of small and medium sized private companies, most of whom employ less than 50 people. These suppliers focus on specialist tobacco product ranges such as cigars, pipe tobacco and snuff.
The International Union Against Tuberculosis and Lung Disease UK	Other	Health charity/NGO (working at international level).

<p>The National LGB&T Partnership</p>	<p>Other</p>	<p>This document provides feedback from the National LGB&T (lesbian, gay, bisexual and trans) Partnership, a member of the Department of Health Strategic Partner Programme. The National LGB&T Partnership is an England-wide group of LGB&T voluntary and community service delivery organisations (see below for members of the Partnership) that are committed to reducing health inequalities and challenging homophobia, biphobia and transphobia within public services.</p> <p>The National LGB&T Partnership members intend to positively influence the policy, practice and actions of Government and statutory bodies, in particular the Department of Health, for the benefit of all LGB&T people and communities across England. The member organisations of the National LGB&T Partnership are:</p> <ul style="list-style-type: none"> • The Lesbian & Gay Foundation (LGF) • East London Out Project (ELOP) • Gay Advice Darlington and Durham (GADD) • Gender Identity Research and Education Society (GIREs) • GMFA • Consortium of LGB&T Voluntary and Community Organisations • London Friend • PACE • Stonewall Housing • Trans Resource and Empowerment Centre (TREC) • Yorkshire MESMAC
<p>The National Specialty Registrars Committee of The Faculty of Public Health</p>	<p>Other</p>	<p>The National Specialty Registrars Committee of the Faculty of Public Health.</p>
<p>The Newcastle Upon Tyne Hospitals Foundation Trust</p>	<p>NHS Organisation</p>	
<p>The Roy Castle Lung Cancer Foundation</p>	<p>Health Charity/NGO (Working At National Level)</p>	
<p>The Royal College of Midwives</p>	<p>NHS Organisation</p>	

<p>The Royal College of Ophthalmologists</p>	<p>Other</p>	<p>The Royal College of Ophthalmologists (RCOphth). The RCOphth welcomes the opportunity to contribute to the consultation on standardised packaging of tobacco products.</p> <p>The College together with other UK charitable organisations has been working towards increasing awareness of the association between smoking and sight impairment. Most recently (March 2012), this has led to the European Commission adopting the health warning "smoking increases the risk of blindness", as one of its 14 new health warnings to be printed on tobacco products. EU Governments now have up to 2 years to introduce these new written health warnings on tobacco products. Evidence from Australia and New Zealand suggests that health warnings about the association of smoking and sight impairment not only raises awareness but also encourages smokers to consider cessation.</p> <p>Of the 15 questions in the consultation, the RCOphth response is focused on those related to health.</p>
<p>The Royal Environmental Health Institute of Scotland</p>	<p>Other</p>	<p>The Royal Environmental Health Institute of Scotland (the Institute) has been in existence for over 135 years and has around 1.200 members the majority of whom are Environmental Health Officers working in that capacity for Scottish local authorities.</p> <p>The Royal Environmental Health Institute of Scotland is a registered Scottish charity, No. SC009406.</p>
<p>The Royal Pharmaceutical Society</p>	<p>Other</p>	<p>Professional Leadership Body.</p>
<p>The Scottish Wholesale Association</p>	<p>Retail Representative Organisation</p>	
<p>The Swedish Tobacco Manufacturers Association</p>	<p>Other Type Of Business Representative Organisation</p>	

The Transatlantic Business Dialogue (TABD)	Other Type Of Business Representative Organisation	
The Ulster Unionist Party	Other	
Tobacco Control Research Group, University of Bath	University Or Research Organisation	
Tobacco Control Research Group, University of Edinburgh	University Or Research Organisation	
Tobacco Free Buckinghamshire Alliance, NHS Buckinghamshire	Other	Multi agency tobacco control alliance.
Tobacco Free Futures	NHS Organisation	
Tobacco Free Hertfordshire, NHS Hertfordshire	Local Tobacco Control Alliance	
Tobacco Free Lancashire Partnership	Local Tobacco Control Alliance	
Tobacco Manufacturers Association of Denmark	Other Type Of Business Representative Organisation	
Tobacco Manufacturers' Association (TMA)	Other Type Of Business Representative Organisation	
Tobacco Retailers Alliance	Other	
Tommy's the Baby Charity	Health Charity/NGO (Working At National Level)	
Trading Standards & Licensing, Bootle	Local Authority Trading Standards Or Regulatory Services Department	

Trading Standards Institute	Other	Trading Standards
Trading Standards North West	Local Authority Trading Standards Or Regulatory Services Department	
Trafford Council	Local Authority	
TSSE (Trading Standards South East) – Under Age Sales Focus Group	Local Authority Trading Standards Or Regulatory Services Department	
Tyne and Wear Fire and Rescue Service	Other	Fire and Rescue Service
U.S. Chamber of Commerce	Other Type Of Business Representative Organisation	
UK Centre for Tobacco Control Studies, University of Nottingham	University Or Research Organisation	
Union of European Practitioners in Intellectual Property	Other Type Of Business Representative Organisation	
Unison Gateshead, Local Government Branch	Other	Trade union branch
Unite the Union	Other	Trade Union
Universities of Edinburgh, Glasgow, Aberdeen, Dundee and Saint Andrews	University Or Research Organisation	
Uxbridge NHS	NHS Organisation	
Vision 2020 UK	Health Charity/NGO (Working At National Level)	

VONNE (Voluntary Organisations' Network North East)	Other	VONNE is the support body for the voluntary and community sector (VCS) in the North East of England. We represent over 600 charities, voluntary organisations, community groups, networks and social enterprises from across the region with further reach through our many networks.
Wakefield Council	Local Authority	
Wakefield Council	Local Tobacco Control Alliance	
Wakefield Metropolitan District Council	Local Authority	
Wandsworth Borough Council	Local Authority	
Wandsworth Tobacco Control Alliance	Local Tobacco Control Alliance	
Warwickshire LPC	Other	Local Pharmaceutical Committee
Washington Legal Foundation	Other Type Of Business Representative Organisation	
Welsh Committee for Public Health Medicine	Other	Welsh Committee for Public Health Medicine
Welsh Dental Committee	NHS Organisation	
Welsh Medical Committee	Local Authority	
Welsh Pharmaceutical Committee (Welsh Government)	Other	The Welsh Pharmaceutical Committee is established to advise the Minister for Health and Social Service, the Welsh Ministers in general and Welsh Government officials, on issues pertaining to the pharmacy profession.
West Berkshire Council	Local Authority	
West Sussex Tobacco Control Alliance	Local Tobacco Control Alliance	
West Yorkshire Trading Standards Service	Local Authority Trading Standards Or Regulatory Services Department	Responding as Trading Standards tobacco coordinator on behalf of the Yorkshire and Humber Trading Standards Group

Whitby Group Practice and Clinical Teaching, Leeds University	University Or Research Organisation	
Whitecliffe Primary School	Other	
WHO Framework Convention on Tobacco Control Secretariat	Other	
Wigan & Leigh Tobacco Control Alliance	Local Tobacco Control Alliance	
Wigan Council Trading Standards	Local Authority Trading Standards Or Regulatory Services Department	
Wigan MBC	Local Authority	
Wokingham Borough Council	Local Authority	
World Heart Federation	Other	World Heart Federation
World Lung Foundation, Hong Kong Office and Asian Consultancy on Tobacco Control	Other	World Lung Foundation (Global health foundation, part of Bloomberg Initiative) and Asian Consultancy on Tobacco Control (Hong Kong based NGO)
Wycombe District Council	Local Authority	Wycombe District Council - Local Authority
NHS Yorkshire and The Humber	NHS Organisation	
Young People Lifestyle Choices Lead Group, Rochdale MBC	Other	Young people Lifestyle Choices Lead Group, which is a multi-agency group, which is chaired by the Service Director for Children, Schools and Families – Targeted Services, and the group includes representatives from the local authority, the NHS and the Police
Youthlink Scotland	Other	National youth work agency (voluntary sector)

