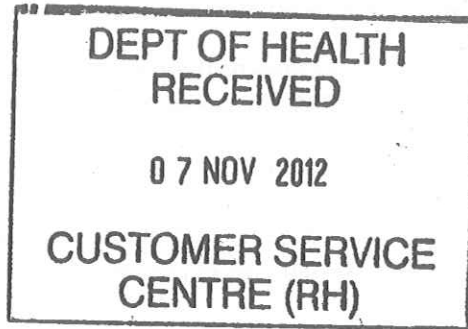


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1st November 2012

Dr Daniel Poulter MP
House of Commons
London
SW1A 0AA



Dear Dr Poulter,

Standardised packaging of tobacco products

We are all independent retailers and are writing to you in our capacity as spokespeople of the Tobacco Retailers Alliance (TRA), a coalition of 26,000 independent retailers who sell tobacco products. Since 1983, the TRA has represented the rights of legitimate retailers to sell tobacco products in a legal and responsible way. The TRA is funded by the Tobacco Manufacturers' Association which means it can offer a free membership to all independent retailers who sell tobacco. We campaign on issues of relevance both to our businesses and to the industry.

We are getting in touch as we strongly believe there is no credible evidence that standardised packaging would achieve the Department of Health's public health policy objectives, including that of discouraging young people from taking up smoking.

We believe standardised packaging would have several negative consequences including:

- an increase in tobacco smuggling including counterfeit products (and young people's access to it) and the other criminal activity it funds in our communities;
- an increase in transaction times as store staff find the correct product. A recent experiment of standardised packaging was carried out by the Rural Shops Alliance (RSA), the first of its kind using real shops, real staff and real customers. The report found that transaction times doubled and errors by staff during transactions quadrupled (www.ruralshops.org.uk). In reality, this would lead to longer queues in stores and longer periods of time not keeping an eye on the shop, which would increase the risk of pilfering and violence.
- an increase in staff costs. The RSA report concludes that the extra staff time required to provide the same service to customers if packets were standardised would cost the retail sector £37million;
- an increase in demand for lower priced products from customers who would see the cost of the tobacco as the key differentiating factor between brands. This would affect our margins and profitability, and ultimately the viability of our entire businesses, as tobacco makes up 30-40% of the turnover of a typical corner shop;
- an increase in the time it takes for the operational burden of re-stocking and stock-taking.

PTO

- an additional increase in regulations affecting our sector before the pending "display ban" regulations have been implemented (April 2015), let alone evaluated;

Instead we feel the government should work with retailers and consider:

- enforcing existing penalties on those who smuggle tobacco and focussing enforcement action on the illicit market, rather than on law-abiding small businesses like mine;
- making proxy purchasing of tobacco illegal as it is in Scotland;
- supporting local shopkeepers, not burdening them with more red tape. We provide essential services for local communities and already act as "gatekeepers" for age-restricted products;
- supporting and promoting successful proof-of-age campaigns such as No ID No Sale and CitizenCard;
- investing in education to raise awareness of existing tobacco control laws which will help prevent children accessing tobacco.

Independent retailers make up a vital part of your constituency and we would like to have your full support for measures that maintain our way of life – standardised packaging is not one of them.

The TRA would welcome the opportunity to meet with you to discuss these matters further and in the meantime, we have enclosed with this letter a handout which will give a bit more information about the effects that standardised packaging will have on retailers.

Thank you for your time.

Yours sincerely,

~~S. Barrett~~ Dev Aswani. C. RA
 D. Corris Mahendra Jadeja S. Khonat P. Singh
 John McKeown

John Abbott, Darlington retailer, North East Spokesman, Tobacco Retailers Alliance
Dev Aswani, Swansea retailer, Wales Spokesman, Tobacco Retailers Alliance
Geoffrey Barrett, Glasgow retailer, Scotland Spokesman, Tobacco Retailers Alliance
Debbie Corris, Whitstable retailer, National and South England Spokeswoman, Tobacco Retailers Alliance
Mahendra Jadeja, Winchmore Hill retailer, London Spokesman, Tobacco Retailers Alliance
Suleman Khonat, Blackburn retailer, North West Spokesman, Tobacco Retailers Alliance
John McKeown, Ballymena retailer, Northern Ireland Spokesman, Tobacco Retailers Alliance
Parminder Singh, Birmingham retailer, West Midlands Spokesman, Tobacco Retailers Alliance


Plain Packaging



Australian example of plain packaging



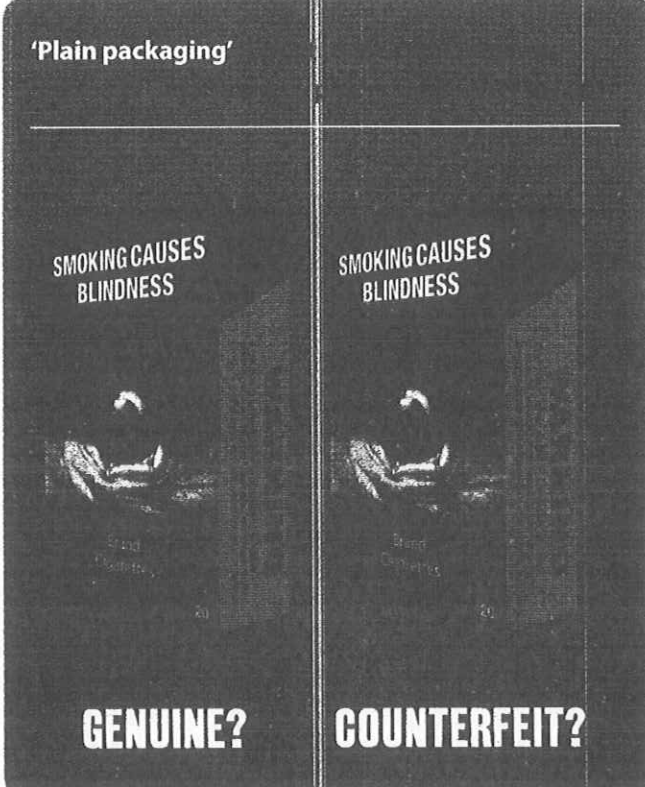
Plain packaging – or standardised packaging as it is also known – would involve the removal of all distinguishing design, fonts and colouring from the packs of any tobacco products sold in shops. Instead, packets would all be the same colours and all the brand names on the packets would be in the same-sized font.



Debbie Corris,

"A recent survey found that 86% of serving police officers in the UK believe that plain packaging would increase tobacco smuggling. That means lost sales to legitimate retailers like me. In addition, plain packaging is not being proposed as an alternative to the display ban - it is a double whammy. This means that after removing the display cover, you would then have to spend longer locating a particular brand from an array of 'identical' looking products. This would increase: transaction times; the amount of time spent with your back to the rest of the shop; and the risk of theft and of potential violence."

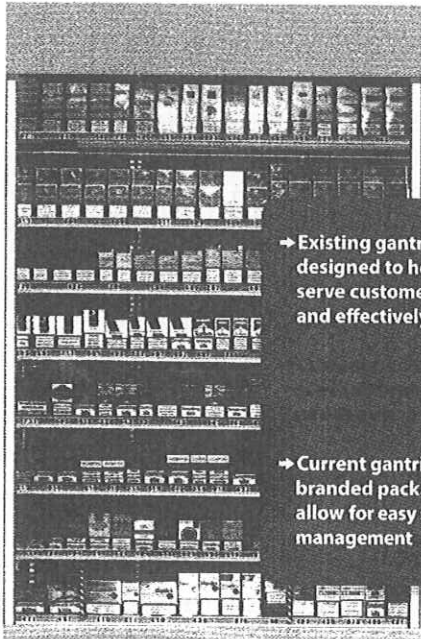
'Plain packaging'



GENUINE? COUNTERFEIT?

What will it mean on a daily basis for retailers?

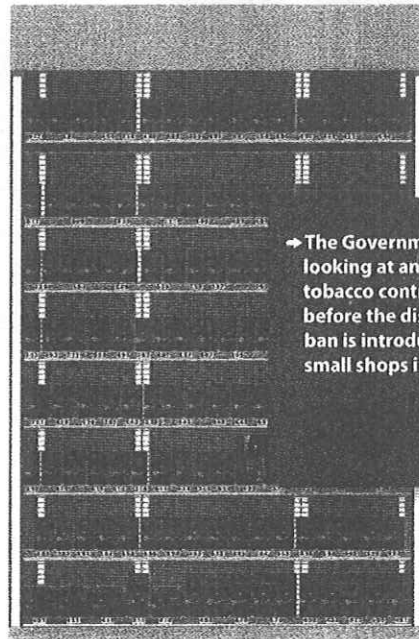
- An illegal sale by a smuggler is a lost sale and lost profit for a legitimate retailer
- Longer transaction times would affect customer service
- Smokers may look to purchase cheaper products which would hit turnover and profits



→ Existing gantries are designed to help serve customers quickly and effectively

→ Current gantries and branded packaging allow for easy stock management

From this to this



→ The Government are looking at another tobacco control measure before the display ban is introduced in small shops in 2015

Better Solutions

- Clamp down on the sale of illicit tobacco in local communities which can often end up in the hands of children
- Ask the Home Office to recognise 'PASS-hologrammed' proof-of-age cards (such as CitizenCard) as valid ID
- Make proxy purchasing of tobacco for under 18s illegal – as it is for alcohol
- Assess the impact of the tobacco display ban before looking to implement further tobacco control initiatives which impact disproportionately on small shops
- The government should support local retailers in their role as 'gatekeepers' to age-restricted products

