



3 - Towns Partnership

3 Towns Partnership  
Durham County Council  
Crook Civic Centre  
Crook  
Co Durham  
DL15 9ES

Tel: 01388 761 989

Email: [3townsaap@durham.gov.uk](mailto:3townsaap@durham.gov.uk)

[www.durham.gov.uk/3townsaap](http://www.durham.gov.uk/3townsaap)

## **SUBMISSION SUPPORTING PLAIN, STANDARDISED PACKAGING OF TOBACCO PRODUCTS**

To [3townsaap@dh.gsi.gov.uk](mailto:3townsaap@dh.gsi.gov.uk)

I am writing on behalf of the Three Towns Partnership Board, who received a presentation regarding the above consultation on 22<sup>nd</sup> March 2012 and agreed to provide a letter of support at the appropriate time.

AAP's are key ways of working with local people. Each AAP is made up of an area forum and an area board to identify and tackle issues in local communities. AAP's then put plans and actions in place to deliver services where they are needed most. There are 14 partnerships across County Durham, each with a board made up of elected members from organisations such as the county council, town and parish councils, and health, police and fire brigade, community and voluntary groups, and the public. Three Towns Partnership is the AAP which covers the area of Crook, Willington and Tow Law and the surrounding areas

We would like to express our strong support for measures to introduce plain, standardised packaging for all tobacco products in the UK as part of the current Government consultation.

We fully support introducing here in the UK the same type of plain packaging that is being implemented in Australia in December 2012 - tobacco products with no branding, a uniform colour and standard font and text for writing on the pack. We believe these would bring public health benefits over and above those from current initiatives in the UK.

Around 340,000 children in the UK try their first cigarette every year. Smoking starts not as an adult choice but in childhood through experimentation, at an age when children have little grasp of the health risks from middle age nor the speed with which addiction takes hold. The average age for smokers starting in the North East is just 15, with 43% of smokers starting between the ages of 10 and 14.

Smoking still remains 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. Within County Durham the cost is estimated to be £21 million a year and smoking attributable deaths in County Durham are higher than the north east average.

Based on this level of harm to individuals, our communities and the North East region, we believe plain, standardised packaging of tobacco products to be a proportionate response that would:

- Discourage young people from starting to smoke – tobacco firms invest huge sums of money into advertising and marketing their products to recruit new customers, who are nearly always children. Branded tobacco products are

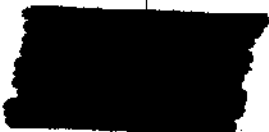
viewed as more appealing among young people than plain, standardised packs, which are viewed as less attractive, containing more poisons and of poorer taste.

- Encourage people to stop smoking – plain, standardised packs communicate the harms of smoking far more effectively than branded products, with the health messages more obvious. Packs in the white or silver colours of former "low tar" brands give the false impression to smokers that they can minimise the risks of their smoking, delaying or replacing quitting intentions.
- Discourage people who have quit or are trying to quit smoking from relapsing – the temptation of brands increase the pressure on former smokers not to stay quit.
- Reduce people's exposure to smoke from tobacco products.

Having seen these cigarette packaging the AAP believes it is wrong that a product that contains over 4000 chemicals, including at least 80 known to cause cancer, is currently marketed through these innovative, colourful packaging, similar to the way breakfast cereals, energy drinks or confectionary are marketed.

There is within the AAP high public support to protect children from tobacco marketing and do more to discourage children from taking up smoking. We therefore call for Government action to adopt this measure and help to make smoking history for our children.

Yours faithfully,



  
**AAP Coordinator**  
**Three Towns Partnership**

Principal AAP Co-ordinator  
on behalf of [REDACTED] – Chair of 4 Together Partnership  
Durham County Council  
3-5 Haig Terrace,  
Ferryhill,  
Co Durham  
DL17 8NR  
03000 26 72 10  
[REDACTED] [durham.gov.uk](mailto:[REDACTED]@durham.gov.uk)

12<sup>th</sup> July 2012

## **SUBMISSION SUPPORTING PLAIN, STANDARDISED PACKAGING OF TOBACCO PRODUCTS**

To: [REDACTED] [gsi.gov.uk](mailto:[REDACTED]@gsi.gov.uk)

The 4 Together Partnership (Durham County Council's Area Action Partnership covering the settlements of Ferryhill, Chilton, West Cornforth and Bishop Middleham) held its' Board meeting on 11<sup>th</sup> July where the campaign was discussed.

We would like to express our strong support for measures to introduce plain, standardised packaging for all tobacco products in the UK as part of the current Government consultation.

We fully support introducing here in the UK the same type of plain packaging that is being implemented in Australia in December 2012 - tobacco products with no branding, a uniform colour and standard font and text for writing on the pack. We believe these would bring public health benefits over and above those from current initiatives in the UK.

Around 340,000 children in the UK try their first cigarette every year. Smoking starts not as an adult choice but in childhood through experimentation, at an age when children have little grasp of the health risks from middle age nor the speed with which addiction takes hold. The average age for smokers starting in the North East is just 15, with 43% of smokers starting between the ages of 10 and 14.

Smoking still remains 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. Within County Durham the cost is estimated to be £21 million a year and smoking attributable deaths in County Durham are higher than the north east average.

Based on this level of harm to individuals, our communities and the North East region, we believe plain, standardised packaging of tobacco products to be a proportionate response that would:

- Discourage young people from starting to smoke – tobacco firms invest huge sums of money into advertising and marketing their products to recruit new customers, who are nearly always children. Branded tobacco products are viewed as more appealing among young people than plain, standardised packs, which are viewed as less attractive, containing more poisons and of poorer taste.
- Encourage people to stop smoking – plain, standardised packs communicate the harms of smoking far more effectively than branded products, with the health messages more obvious. Packs in the white or silver colours of former “low tar” brands give the false impression to smokers that they can minimise the risks of their smoking, delaying or replacing quitting intentions.
- Discourage people who have quit or are trying to quit smoking from relapsing – the temptation of brands increase the pressure on former smokers not to stay quit.
- Reduce people’s exposure to smoke from tobacco products.

Having seen these cigarette packaging the AAP believes it is wrong that a product that contains over 4000 chemicals, including at least 80 known to cause cancer, is currently marketed through these innovative, colourful packaging, similar to the way breakfast cereals, energy drinks or confectionary are marketed.

There is within the AAP high public support to protect children from tobacco marketing and do more to discourage children from taking up smoking. We therefore call for Government action to adopt this measure and help to make smoking history for our children.

Yours faithfully



4 Together Partnership Chair

## **Alliance Party of Northern Ireland**

### **Response to the Department of Health Consultation on Standardised Packaging of Tobacco Products**

**August 2012**

Alliance Party of Northern Ireland  
[REDACTED]

Belfast  
[REDACTED]

[REDACTED]@apni.org

#### **Introduction**

The Alliance Party fully supports the introduction of standardised packaging of all tobacco products including cigarettes and hand-rolling tobacco. These are commitments that we have made in our recent election manifestos.

Smoking is well known to be a major preventable cause of morbidity and mortality. Thus the prevention of taking up smoking and aiding cessation of smoking by the standardising packaging initiative is a clear public health issue.

#### **Government action**

Alliance supports the British Heart Foundation's call for the UK Government to introduce a tobacco plain packaging bill into Parliament and seek amendments to the EU Tobacco Products Directive to enable large front-of-pack picture health warnings.

It is possible for the UK to legislate for standardised packaging. However in order for pictorial health warnings to be introduced on the front of packs, the EU Tobacco Products Directive will need amendment. Attention should be given to this fact as the Directive is due to be updated by 2014.

Alliance calls for the removal of the last form of legal tobacco advertising which is the branding on tobacco packaging. Furthermore 'tobacco' signs in stores such as major supermarkets, which hang at the sales point to advertise tobacco should have to carry a health warning just like the products.

The United Nations (UN) and the World Health Organisation (WHO) take tobacco control extremely seriously. The United Nations Economic and Social Council (ECOSOC) adopted a landmark resolution in 2012 on tobacco control. The resolution includes further emphasis on the obligation of Parties to the WHO Framework Convention on Tobacco Control (FCTC) to set up comprehensive, multi-sectoral national control strategies, plans and programmes on tobacco control. The FCTC, which is ratified by the UK, came into force in 2005 and calls on all parties to enact and undertake comprehensive bans on tobacco promotion, advertising and sponsorship. It is therefore an anomaly to allow cigarette packaging in the UK to continue as a means of tobacco promotion.

### **Impact of smoking on health**

The BMA states on their website that smoking is still a leading cause of disease and death with NHS costs in the UK estimated at £2.7 billion per year and costs to the wider UK economy at around £2.5 billion in sick leave and lost productivity.

According to the Cancer Research UK website, 100,000 deaths per year in the UK are due to tobacco. Furthermore 8 out of 10 smokers start before the age of 19.

Cancer Research UK also states that smoking accounts for one in four UK cancer deaths, nearly a fifth of all cancer cases and that smoking kills five times more people than road accidents, overdoses, murder, suicide and HIV all put together.

Smoking causes more than four in five cases of lung cancers which is the most common cause of death from cancer in the UK. If smoking is given up in time most of these deaths are preventable. Smoking also increases risk in cancers of the mouth, pharynx, larynx, nose and sinuses, oesophagus, stomach, liver, pancreas, bladder, kidney, bowel and cervix as well as some types of leukaemia and one type of ovarian cancer. There is also evidence that smoking may increase the risk of breast cancer.

Smoking is a major risk for coronary heart disease and is a risk factor in acute myocardial infarction and sudden death (DHSSPSNI Service Framework for Cardiovascular Health and Wellbeing 2009) and a main risk factor for chronic respiratory diseases (WHO).

While prevalence of smoking has declined overall it is of significance that the percentage reduction for young females is smaller, while the rate of smoking is also proportionally linked to socio-economic inequalities.

### **Prevention: Standardised tobacco packaging will discourage taking up smoking**

The Alliance Party believes that standardised tobacco packaging would contribute to improving public health by discouraging young people from taking up smoking.

By the age of 15 around 1 in 8 children have become regular smokers (Cancer Research UK Website).

Standardised packaging of tobacco products is highly likely to reduce the appeal of cigarettes to children and young people. Bright colours are attractive to children and young people and the shape, depth and styling of packets, for example slim line packs, can add to the use of cigarette packs as status symbols and imply glamour. Research on this factor has been validated or cited by a number of organisations – for example the BMA in their 2010 General Election Manifesto and the British Health Foundation in their publication 'The Plain Truth'. Furthermore the Cancer Research UK website states that 'packets are designed to be attractive and communicate the 'personality' of a brand. They can act as 'badge products' and an extension of a person's identity.'

Aside from the research it is common sense that standardised size, shape and unattractive coloration on packs will reduce appeal.

### **Early intervention: Standardised tobacco packaging will encourage people to give up smoking**

The Alliance Party agrees that the introduction of standardised tobacco packaging would contribute to improving public health by encouraging people to give up smoking and by discouraging people who have quit or are trying to quit smoking from relapsing.

People who have been smoking for some time may require cessation services to assist them in giving up smoking. However the reduced appeal of standardised tobacco packaging will provide an additional motivation to those who wish to quit or who have already quit and wish to avoid relapse. Clearly purchasing a dull pack is not going to provide the same positive feeling as purchasing a bright attractive pack. This has been validated by research cited by the British Heart Foundation.

Misleading issues such as light coloured packs mistakenly being thought of as providing a healthier product will be eliminated (Cancer Research UK website).

### **Reduction in exposure to smoke from tobacco products/reduction in appeal to consumers**

Children and young people are less likely to purchase dull coloured standardised cigarette packs and so their exposure to tobacco smoke from their own smoking or their peers smoking will be reduced. Furthermore children and adults alike will benefit from the impact of standardised packaging on the purchasing habits of adult smokers who will be encouraged to quit or avoid a relapse into smoking habits by standardised packaging which is uninteresting, lacking in style by uniformity of shape and showing health warnings which stand out to greater effect on such packaging. As standardised packaging reduces the prevalence of smoking in society, children and young people in particular will be further protected from the health risks associated with passive smoking.

### **Increase in the effectiveness of health warnings on packets**

Health warnings must be clear and unambiguous. It is imperative that health warnings are of a size and clarity to have maximum impact at first glance by the consumer. It is important to understand that branding on cigarette packs reduces the clarity and effectiveness of health warnings.

Standardised packaging provides the opportunity to ensure that health warnings are the single most noticeable wording on the packets. Any standardised coloration used must allow the wording of warnings to be clearly visible.

As cited above Alliance supports the call for the introduction of large front-of pack picture warnings. Such picture warnings must be decided after all age consumer research to ensure that the correct picture/s is selected to have the desired negative effect.

### **Reduce the ability of tobacco packaging to mislead consumers about the harmful effects of smoking**

Standardised packaging of tobacco products should be designed to eliminate consumers being misled as to the effects of smoking. Currently it is possible for branding to include light colours and/or slim line packs which can be misinterpreted

as an indication of healthier products (Cancer Research UK website). Furthermore gold and silver packaging which has been used to imply 'lighter' or lower tar products will no longer be able to be used. If all the packs are the same colour and shape the potential for consumers to be misled will be removed.

As cited above, it is also important to understand that branding on cigarette packs reduces the clarity and effectiveness of health warnings.

### **Effect on tobacco-related attitudes, beliefs, intentions and behaviours of children and young people**

Reducing the appeal of packaging will also reduce the appeal of an imagined lifestyle associated with branded packaging variations. Suggestions of glamour, style, popularity and sophistication will be eliminated. The aim of changing attitudes to tobacco products should be evaluated to ensure that the standardised packaging selected continues to be effective.

### **Reducing health inequalities**

The rate of smoking is known to be higher in areas of socio-economic deprivation. Furthermore smoking is at a higher prevalence among people with a mental health problem and poor physical health is known to increase the risk of mental illness (No Health without Public Mental Health Royal College of Psychiatrists Position Statement PS4/2010). Removing the last method by which tobacco products can be promoted and thereby fundamentally reducing their appeal will allow a major positive impact on the health inequalities suffered by the most vulnerable in society.

### **Conclusion**

Alliance regards this issue as a straightforward public health issue. We do not believe that a balanced solution that takes into account retail or industrial considerations is necessary or appropriate. Smoking is taking lives and creating its own financial, economic and social costs for society, and measures to effectively deter smoking are therefore critical.



API Group plc  
Second Avenue  
Poynton Industrial Estate  
Poynton  
Stockport  
Cheshire SK12 1ND

Tel +44 (0) [REDACTED]  
Fax +44 (0) [REDACTED]

www.apigroup.com

Tobacco Packs Consultation  
Department of Health  
7th Floor  
Wellington House  
133-155 Waterloo Road  
London  
SE1 8UG

26 July 2012

Dear Sirs

**Response to the Consultation on Standardised Packaging of Tobacco Products (United Kingdom scope)**

I am responding on behalf of API Group plc, a manufacturer of foils, films and laminated materials used to enhance and differentiate the packaging of premium consumer goods. Out of a total global workforce of around 550, we employ some 350 people in the UK at locations in North West England and Scotland.

As a medium sized enterprise engaged in manufacturing in the UK, API is exactly the type of company which the Coalition claims is central to its economic strategy.

Government has a responsibility to take our views on plain packaging into account since our business would be directly affected by any decision. Whilst a small value of our sales are invoiced direct to tobacco companies, approximately 30% of Group turnover and almost 40% of turnover from UK operations is supplied to printer/converters for incorporation into tobacco packaging. This market would be closed to us if a plain packaging regime came into effect.

In addition to our direct business interest in the outcome of any decision on plain packaging, we also have relevant expertise to contribute to the Department of Health's deliberations; relating to packaging design and production and, specifically through our Security Holographics division, the threats and solutions associated with the trade in counterfeit goods.

Whilst we have links to tobacco companies through our supply position, API does not receive any funding from the tobacco industry.

We are happy for our response to be identified in the summary report of consultation responses.

***API supports option 1 of the consultation, to maintain the status quo for tobacco packaging.***

We note the statement in the Impact Assessment accompanying the Consultation, that "for tobacco control policies to be justified, the impact on smoking behaviour and the consequent improvement in health need to be sufficiently large to justify the related costs." In our considered view, plain packaging comprehensively fails to satisfy that criteria.

Your attention is drawn to API's critique of the DoH commissioned study "Plain Tobacco Packaging: A Systematic Review" which exposes as wholly misleading, the impression given that the 'scientific' evidence base supports the case for plain packaging on grounds of health promotion. The reality is that the impact of plain packaging on levels of smoking, including amongst young people, is a matter of pure speculation.

Of even greater concern is the potential for a significant rise in the level of counterfeit and illicit trade in the tobacco market which, as well as having serious economic and social consequences, threatens to set the health agenda backwards and even risks the government losing effective control of anti-smoking policy.

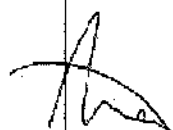
Finally, there would be serious implications for business from a decision to press ahead with such a contentious measure. Especially in today's economic environment, there is no place for ill-thought through and disproportionate regulation, which would destroy hundreds if not thousands of valuable manufacturing jobs, risk getting bogged down in legal and trade disputes and send a message to the world that the UK cannot be relied upon to stand up for vital property rights and freedoms.

API's objections to plain packaging are more fully set out in the attached submission.

As an alternative approach to policy development in this area, it is suggested that the Department of Health commission a thorough and objective review of the experience of existing tobacco control measures from the UK and around the world combined with deep research into the behaviour of people who engage in smoking (and similar unhealthy activities) despite being fully informed of the dangers. In the meantime, the government is encouraged to concentrate on enforcing and reinforcing existing age restrictions for the purchase of tobacco and on fighting the illicit trade.

This submission should be considered separately to the 256 individual responses to the consultation which you will have received under separate cover on behalf of our UK employees.

Yours sincerely



**Andrew Turner**  
**Chief Executive Officer**

Andrew.turner@apigroup.com

## **Response to the UK Government Consultation on Standardised Packaging of Tobacco Products by API Group plc, July 2012**

### **1. Health Implications of Plain Packaging**

#### **1.1. Increase in Illicit Trade**

According to HMRC, illicit trade already accounts for 27% of tobacco consumption in the UK despite strenuous efforts to counter it by legitimate producers and the enforcement authorities. Counterfeits comprise 48% of seizures by enforcement authorities.

***Defence against counterfeits.*** Relating to packaging, three key strategies are employed to defend against counterfeiters:

- (i). Packaging is made difficult to copy by employing specialist, high cost technologies such as gravure printing, high tolerance embossing, special finishes & effects and innovative carton constructions;
- (ii). Designs are changed on a regular basis, or as required, as a way of moving the goalposts for counterfeiters;
- (iii). Packaging is used to differentiate brands and create associated perceived value which consumers are willing to pay premium prices for. That perceived value represents a barrier to trading down to lower priced product and to illicit alternatives.

***Deceiving consumers.*** With all the complexity and subtlety removed from packaging designs, retailers and consumers will find it impossible to distinguish between genuine and fake goods. Even trading standards officers and other enforcement personnel will find identifying counterfeits significantly more difficult, having to rely solely on expensive and labour intensive covert authentication technologies.

***Ease of copying / counterfeiters' economies of scale.*** The likely formats of standardised packaging will be easy to produce by commonly available printing and conversion techniques with no requirement for the many specialised technologies which are in use today. This will significantly reduce the investment required by counterfeiters to gain access to the market and any investment made by them in printing and packaging equipment could be leveraged across the total market volume.

***No practical remedy would be available if counterfeit product started to swamp the market*** under a plain packaging regime. Whereas currently, brands have to be picked off one at a time and pack designs can be changed if a counterfeit alternative gains a foothold.

***Trading down to illicit product.*** The de-sensitisation of consumers to the value of brands is equally important to the encouragement of the illicit trade. If consumers lose their recognition of the premium value of genuine product, they will be much more inclined to buy indiscriminately through the black market. API has considerable expertise in the use of overt authentication devices such as holograms, but these can only be effective when consumers are both educated and motivated to use them.

***Health consequences.*** A major increase in illicit trade would have devastating consequences for public health, with tobacco falling increasingly outside the reach of tobacco control

regulations, including high prices through taxation, restrictions on sale to under-18s and control on ingredients. Thus, plain packaging could prove completely counter-productive; driving tobacco into the same territory as drugs, increasing availability to young people, encouraging consumption through lower prices and exposing smokers to the heightened dangers of illegally manufactured product.

## **1.2. Smoking Behaviour and Smoking Initiation by Young People**

***Plain Tobacco Packaging: A Systematic Review.*** A review of evidence on the potential impact of plain packaging on tobacco consumption has been commissioned by the DoH in the form of the PHRC report “Plain Tobacco Packaging: A Systematic Review”. A critique of that review by API is appended to this submission and in summary makes the following observations:

- no evidence is considered (because none exists) on the impact of plain packaging on smoking behaviour in the real world;
- no evidence is presented to establish a link between findings on attitudes and reactions to plain packaging from predictive studies and the desired changes in smoker behaviour;
- evidence and conclusions from the review relating specifically to young people are negligible;
- being drawn at random from the general public, the vast majority of study samples are loaded with committed non-smokers and therefore not representative of the target population of the proposed policy, ie smokers and young people;
- the single convincing result from the review is that branded packs are generally more attractive than the plain alternatives; which is no more than a statement of the obvious and tells us nothing about plain packaging’s impact on the appeal of smoking itself;
- results regarding the impact of plain packaging on the salience of health warnings are at best mixed. On closer scrutiny, of for example the relative size of the various studies, it can be seen that the evidence in favour of plain packaging is in fact negligible. This is not surprising given the real life experience when textual warnings were supplemented by gruesome images with similar objectives to plain packaging (see below);
- results regarding the impact of plain packaging on the perception of harm and strength were described even in the report in no more convincing terms than “mixed”. A simple analysis of study outcomes shows only 41% in favour of plain packaging, with 23% concluding that branded packs communicate harm and strength better than plain ones!
- on “smoking-related attitudes, beliefs, intentions & behaviour” the overall pattern of findings was again described as “mixed” and participant levels in studies yielding positive results on intentions were only 13% of those saying plain packaging would make ‘no difference’ at all.

In summary, the review of evidence provides no sound basis for believing that plain packaging would have any impact whatsoever on smoking behaviour or rates of consumption.

***Evidence from Previous Packaging-related Regulations.*** “Plain Tobacco Packaging: A Systematic Review” completely ignores the evidence on the impact of previous packaging-related measures, despite this having much greater credibility than predictive studies on reactions to plain packaging:

A PHRC report from 2010 commissioned by the DoH, “Evaluating the impact of Picture Health Warnings”, concluded that “the range and depth of knowledge about the health risks of smoking did not change after the pictures were introduced ... and ...there were very few smoking-related behaviour changes observed after the pictures were introduced”.

A major worldwide study conducted by the international audit firm Deloitte, published in May 2012 found that “packaging regulation, including increasing the size of health warnings and presence of graphic images, has not had any statistically significant impact on tobacco consumption.” This conclusion is supported by UK data on smoking prevalence which shows no change since picture health warnings and restrictions on the use of product descriptors came into effect.

Any objective analysis of the potential health impact of plain packaging is defective without consideration of this experience.

### **1.3. Impact over and above Existing Tobacco Control Measures**

The population is already well informed about the health risks associated with smoking. Opportunities to buy tobacco products or to smoke are significantly restricted. At paragraph 2.8 of the Consultation document it is stated that the DoH “wants to explore whether [plain packaging] has the potential to bring public health benefits over and above those expected to accrue from existing tobacco control initiatives”. This question cannot be addressed until the impact of those existing initiatives has first been evaluated.

***Retail display ban.*** The implementation of the Tobacco Advertising and Promotion Regulations 2011 is not due to be completed until April 2015. There is obvious duplication between this measure and the plain packaging initiative. The retail display ban will render tobacco products substantially invisible prior to purchase, removing the major situation where packaging could impact consumer behaviour. There is significant overlap between the intended effects of the display ban and of plain packaging and it is self evident that there is little to be gained by removing the branding on packaging which is in any case hidden from public view. In any case, government has a responsibility to complete and then evaluate the impact of the display ban before introducing another wave of overlapping regulation.

***Age restrictions.*** A statistic quoted in the Consultation document on the proportion (two thirds) of people who started to smoke as under-18s is misleading in that it tells us nothing about the situation which exists today. Many of those surveyed will have commenced smoking years if not decades ago when social norms, attitudes to smoking and regulation were completely different.

A more up-to-date picture of youth smoking is available from the National Centre for Social Research SDD survey which shows just 5% of under-16s admit to smoking regularly (one or more cigarettes per week), down from 9% in 2006. This is strong evidence of progress in respect of this age group which may be correlated with the increase in the legal age for

purchasing cigarettes from 16 to 18 introduced in October 2007. However, it appears that no data has been collated relating specifically to under-18s (rather than under-16s) and no specific research has been conducted to evaluate and understand the impact of the change in the age limit. One again, there appears to be an absence of will to gather evidence and learn from previous regulatory measures which is in stark contrast to the DoH's claimed "evidence based" approach.

Suffice it to say that if restrictions on sale of tobacco to under-18s were effectively enforced, plain packaging would have nothing additional to contribute to the reduction in smoking by young people.

#### **1.4. Increased Consumption due to Lower Prices**

Plain packaging would virtually eliminate the ability of tobacco manufacturers to differentiate their brands and to justify premium prices. This would encourage consumers to trade down to lower priced options and ultimately to illicit product. In a commoditised market, price would be the only basis for competition and average prices would fall. Ironically, this would tend to encourage greater consumption. Any attempt by government to make up the difference with increased taxation would only risk further fuelling the illicit trade by increasing the profits to be made.

## **2. Consequences beyond Health Considerations**

### **2.1. Damage from Increased Illicit Trade – Legitimate Business, Tax, Crime**

As explained in 1.1. above, plain packaging risks opening the floodgates to counterfeiters and the illicit trade. This trade threatens to displace volume from legitimate businesses involved in the manufacture, distribution and retail of tobacco products in the UK (estimated by the Cogent to employ approximately 72,000 people and contribute £2.1 billion GVA to the economy).

The £12.1 billion per annum currently collected by the Treasury from tobacco duties and VAT would be jeopardised and significant extra funds would instead flow into the bank accounts of criminals.

Illicit trade is not just a financial problem; it is also a social one. Organised crime is like a cancer, tempting the common citizen into collusion through involvement in illegal purchases and small scale dealing activity, whilst channelling funds into a growing underworld engaged in drug running, people trafficking, violence, extortion and even terrorism.

### **2.2. Distortion of Competition**

Given the prohibition on advertising and promotion of tobacco, packaging is virtually the sole means by which consumers can be informed about, identify and choose between alternative products. That process, which is integral to the proper functioning of any consumer market, would be severely curtailed by the standardisation of packaging.

Plain packaging would distort competition by making it impossible for new suppliers, products or brands to gain access to the market. If a new entrant cannot communicate its

product features or brand identity to consumers and incumbents have overwhelming economies of scale underpinning their pricing capability, the market will become a pure oligopoly.

### **2.3. Unjust Confiscation of Intellectual Property**

Plain packaging legislation would set a new precedent for government encroachment into the market for a legal category of consumer goods. The level of restrictions envisaged amounts to a complete elimination of branding and trademarks and a confiscation of brand owners' intellectual property. Any such move is certain to be challenged in the national and international courts. At the very least, brand owners will need to be compensated for their loss, at huge cost to the public purse.

### **2.4. Damage to 'UK plc'**

The government has recognised the damaging impact of regulation on business and the economy and is committed through its better regulation principles to "reduce the overall volume of new regulation by introducing legislation only as a last resort". This policy initiative demonstrably fails to comply with those priorities.

The idea of plain packaging has been condemned by the International Chamber of Commerce as "hugely damaging to international trade". If the UK were to take a lead in passing such contentious legislation, showing a blatant disregard for principles of proportionality and protection of business interests and property, this country's reputation would be severely damaged as a destination for trade, investment and job creation.

### **2.5. Cost to Retailers**

Apart from the difficulties identifying different products at point of sale due to the near identical nature of each and every pack, the major implication of this initiative on retailers would be the loss of volume to the illicit trade. The impact of this loss is not just in the value of lost tobacco sales but also the multiplier effect on other sales linked to smokers' footfall.

### **2.6. Cost to Packaging Manufacturers & Related Businesses**

API and other sections of the packaging industry will suffer direct loss of sales as a result of a decision in favour of plain packaging. Graphics and packaging design companies, suppliers of special finishes such laminated paperboard & stamping foils (including API) and certain types of printing inks would all be excluded from the tobacco sector, as would printers of overwrap film, bundle-wrap paper and tear tape.

Other elements of the supply chain, such as printers of cartons, pouches & tubs and producers of printing cylinders and tooling, would see a loss of volume to illicit trade and a massive reduction in added value as a result of the commoditisation of packaging.

These suppliers, who have tens of millions of pounds invested in capabilities dedicated to meeting the tobacco industry's unique requirements (including those related directly to previous tobacco control regulations) will be left with redundant assets and a significantly smaller, commoditised and less valuable business.

# **“Plain Tobacco Packaging: A Systematic Review” – A Critique**

**by Andrew Turner of API Group plc.**

## **1. Evidence Base Fails to Address Policy Objectives**

The test for whether plain packaging is justified on health grounds is whether it meets the policy goal stated in the Consultation document at paragraph 1.1 of “improving public health by *reducing the use of tobacco*”.

The evidence reviewed concerns attitudes and reactions to packaging. The review fails to consider evidence for a link between those attitudes and reactions and what really matters; smoking behaviour.

The report fails to mention this critical shortcoming in the Executive Summary, although it is acknowledged in Section 5.6 on Study Strengths and Limitations, as follows:

“... evidence in the review is largely drawn from correlational studies, which makes it *difficult to draw conclusions about expected outcomes*. Many of the studies use hypothetical scenarios, and are therefore *not truly able to test how individuals would react or behave if plain packaging was to be introduced*.”

It is also worth noting that findings regarding smoking-related attitudes, beliefs and behaviour from both the surveys and qualitative *studies* in the review are *reliant upon self-report*. Without any form of validation (such as validating reported changes in cigarette consumption) these *have quite weak predictive validity*.

A common argument is that plain packaging research can never truly replicate real market conditions and, as such, the *suggested impacts* on consumption, cessation and uptake *are so far speculative*.”

Again at Section 5.4, the report states:

“Some caution is required in interpreting these findings, as expressed smoking-related *intentions are not always predictive of future smoking behaviour* (Ajzen & Madden 1986, Sheeran 2002) and *perceptions of the impact* of a future policy measure on the behaviour of others are of course *subjective*.”

## **2. Evidence Criteria Diluted to the Point of Being Meaningless**

**Appeal of Tobacco.** The Consultation calls for evidence on the value of plain packaging in “reducing the appeal of tobacco *products* to consumers” (Consultation document paragraph 3.2). The review widens the scope to “the appeal of the *packaging or product*” (Evidence Review 1.3.1). Related conclusions are presented as having some kind of significance but are in fact obvious to the point of being banal:

“All these studies found that *plain packs were rated as less attractive* than branded equivalent packs, or were rated as unattractive, by both adults and children. ... the plainer the pack, the less attractive” and “... plain packs were perceived to be poorer quality” - Exec Summary: Appeal of Cigarettes, Packs & Brands



It is hardly surprising that branded packaging meets its aims of being attractive and plain packaging achieves the opposite! All of which has no bearing on whether smoking per se is perceived as a less or more appealing activity to engage in.

**Perceptions of Harm.** Again in the Consultation document, evidence is called for on the value of plain packaging in “reducing the ability of tobacco packaging to mislead consumers about the harmful effects of smoking”. If the report’s bald assertion is accepted that consumers *are* misled by “the use of design techniques” on packaging, it follows from logic rather than evidence that the removal of those techniques will have the desired effect. The challenge is to identify what specific techniques have the potential to be misleading and to prove that this is so. In this respect, it is quite misleading to generalise about branded versus plain packaging since even plain packaging could have some characteristic (such as colour) which has the potential to mislead. Therefore, any study results can only be given significance relative to the specific pack designs used for both the branded and plain packaging options.

No doubt because of the limitations explained above, the authors of the Review ‘move the goal posts’ of what constitutes a positive case for plain packaging. It is no longer required that plain packaging *reduces* the extent to which consumers are misled. Instead “the desired outcome of these studies is that *plain packs* should be perceived as *equally harmful* as, or more harmful than, branded cigarettes, and plain packs should be seen as *equally easy* to quit as branded cigarettes or harder to quit.” – Executive Summary, Perceptions of Product Harm and Strength. Even against this diluted criteria, results are described as no more than “mixed”.

**Other Statements of the Obvious.** Other assertions which are either careless generalisations or statements of common sense dressed up as significant conclusions backed by evidence include:

- “Plain packs were perceived to be poorer quality”
- “Plain packs consistently received lower ratings on projected personality than branded packs.”
- “Plain pack colours have negative connotations”
- “Plain packs weaken attachment to brands”
- “Plain packs were perceived as having less ‘clutter’ on them”

### **3. Study Samples not representative of Policy’s Target Population**

The studies selected for the review use predominantly samples drawn from the general public. This sample group is not representative of the population targeted by the proposed policy – existing smokers and young people who potentially might take up smoking. Loading a sample with 80% of participants who don’t smoke and never will is guaranteed to distort the findings relative to the target group. If the attitudes and reactions of existing smokers towards plain packaging are a poor basis for predicting the success of this policy initiative, the attitudes and reactions of the non-smoking adult population are completely irrelevant.

Even the sample selection for the general public is suspect, as stated in Section 5.6 on the Study Strengths and Limitations: “Within the correlational studies in the review there are further limitations in that some of the surveys use samples representative of the general population but most do not, and instead use convenience or probability sampling. This same

lack of representativeness also applies to the qualitative research included, although focus groups and interviews are not intended to be representative.”

Finally, there is minimal evidence specifically related to young people which is identified as a key beneficiary of this policy initiative.

#### **4. Context of Other Tobacco Control Measures**

At paragraph 2.8 of the Consultation document, it is stated that the consultation is intended to explore whether plain packaging would provide “... public health benefits over and above ... existing ... initiatives, including legislation to end the display of tobacco in shops”

Clearly, there is a significant overlap between the aims of plain packaging and the retail display ban. However, none of the evidence presented or reviewed is set in the context of a retail display ban; nor is this omission pointed out by the authors of the report.

Equally, the review has not considered the different types of health warnings to which participants in the different studies were exposed, which range from the biggest and most shocking visual images to no health warning at all. These and other aspects of the prevailing regulatory regime would inevitably impact the attitudes of study participants to smoking generally and packaging measures in particular.

#### **5. Relevant Experience and Evidence Ignored**

The review ignores important evidence relevant to the likely effectiveness of plain packaging; evidence based on real experience and data, which ought to carry considerably more weight than the predictive studies selected for the review. Two packaging related measures already in place in the UK and many other countries are: mandatory large/pictorial health warnings and the banning of the use of descriptors.

**Picture Health Warnings.** The experience from picture health warnings, introduced in the UK in 2008, is directly relevant to any consideration of the impact of plain packaging on the salience of health warnings and of the likely impact of plain packaging in general. Picture health warnings no doubt had a similar instinctive appeal to plain packaging and were equally supported by focus groups and predictive studies. However, as concluded in the PHRC’s own study of 2010 backed up by population-wide statistics, they had a negligible impact on smoking attitudes or behaviour and no effect of rates of smoking in the UK. A major worldwide study published in May 2012 by Deloitte reached similar conclusions. The fact that this evidence is not even considered by the review leads one to question the objectivity of the authors. That they would seriously try to argue that plain packaging would increase the salience of health warnings when shocking pictorial images did not is a travesty of the evidence available.

**Product Descriptors.** Brought in at the same time as picture health warnings, restrictions on the use of terms such as ‘Lights’ and ‘Mild’ is another relevant tobacco control measure which has been overlooked by the report. It is reasonable to expect any review of controls designed to reduce the tendency of smokers to be misled about the harm of cigarettes to be informed by the experience of previous measures with exactly the same objectives. Again, there is no evidence presented and no attempt to consider what can be learned from experience.

## 6. Overstated Conclusions

According to the Executive Summary, “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*”.

Section 5.6 on Study Strengths and Limitations states “... it is worth emphasizing the *remarkable consistency* in study findings regarding the potential impact of plain packaging. This consistency of evidence can provide *confidence about the observed potential effects* of plain packaging. If and when introduced, existing evidence suggests that plain packaging represents an additional tobacco control measure that *has the potential to contribute* to reductions in the harm caused by tobacco smoking now and in the future.”


These positive conclusions are in stark contrast to the detail and reality of the evidence:

- Yes, branded packs are generally more attractive than the plain alternatives, but this is no more than a statement of the obvious and tells us nothing about plain packaging’s impact on the appeal of smoking itself.
- According to the report, study results on salience of health warnings “*suggest that plain packaging tends to increase the recall of health warnings, the attention paid to them and their perceived seriousness and believability.*” However, three of the seven quantitative studies with a collective sample size of 5,258 gave inconclusive or mixed results, one of the studies judged positive yielded a recall difference of just 82.3% versus 79.4% (Beede 1990, sample size of 567) and the remaining three ‘positive studies’ had a combined sample size of just 159. In any case, these predictive studies are contradicted by the actual experience in the UK and worldwide from the introduction of extremely prominent, pictorial health warnings.
- Results from sixteen studies of the impact of plain packaging on the perception of harm and strength were described in no more convincing terms than “*mixed*”, even when evaluated against the reduced criteria that plain packs should be *no less* misleading than branded packs. This is supported by the summary of results at Table 4.4 which judges only 9 out of 22 potential outcomes as in favour of plain packaging, with 8 showing no difference and 5 in favour of branded packs (similar sample sizes throughout). In reality, these aspects can only be considered relative to specific packaging designs, whether plain or branded.
- On smoking-related attitudes, beliefs, intentions & behaviour, only two out of eleven quantitative studies found that “plain packs were associated with more negative feelings about smoking” and again the “overall pattern of findings is *mixed*”. Looking at the summary of results at Table 4.6, it can be seen that outcomes as in favour of plain packaging are reported from 6 studies involving 3,026 participants whilst 5 studies involving 6,903 participants reported no difference. Interestingly of the 4 studies reporting on intentions & behaviour, the combined sample size for studies judged in favour of plain packaging is just 13% of that for studies yielding a ‘no difference’ result. This is hardly an endorsement for plain packaging from that part of the evidence base which is most directly connected to the policy objectives of reducing smoking.

When it is also taken into account that:

- the study samples are loaded with committed non-smokers and not representative of the target population for this initiative of smokers and young people;
- virtually no evidence is presented relating specifically to young people;
- no evidence is considered relating to the link between attitudes and reactions to plain packaging and hoped-for changes in smoker behaviour;
- it is not even considered whether plain packaging has anything to contribute over and above the retail display ban; and
- there is no acknowledgement of the failure of previous packaging-related tobacco control measures;

it can be seen that the positive headline conclusions are significantly overstated and misleading. Far from the evidence for plain packaging being convincing, the review provides no basis whatsoever for believing that this proposed tobacco control measure will make any favourable contribution to "improving public health by reducing the use of tobacco".

  
API Group plc  
2<sup>nd</sup> July 2012

Submission to the  
Department of Health's  
Consultation on the  
Standardisation Packaging  
of Tobacco Products

by

**AsianTrader**

Submitted by:  
Asian Media & Marketing Group  
No1 Silex Street  
London [REDACTED]

9th Aug 2012

# Introduction to Asian Trader

Asian Trader was established in 1885 to serve the growing number of Asians from India and Pakistan who were setting up retail businesses in the UK.

Today, Asian Trader 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-licences, forecourts and convenience stores across the independent and symbol group estate.

Readers vary from independent sole traders with a 500sq ft store to store-branded multisite operators.

Over the years Government legislation has both aided and hindered the sector but the proposed introduction of Standardised Packaging on Tobacco Products has led to an unprecedented level of concern among our readers.

In this submission we will state Asian Trader's opposition to the Introduction of Standardised Packaging for a variety of reasons :

1. Insufficient Evidence
2. Common Sense Legislation
3. Health Risks
4. Retailer Confusion and Risk
5. The Illicit Trade
6. Effect on Local Communities

Each reason will be accompanied by a comment which Asian Trader has received from a retailer and is representative of our readers views on the matter.

You will already have received thousands of submissions from readers of Asian Trader but we also feel so strongly that we feel it necessary to respond on behalf of our readership.

# 1. Insufficient evidence

There is no valid evidence available that Plain Packs will reduce either the incidence of UK adults smoking nor the number of young people taking up the habit.

The UK Government examined the introduction of Plain Packaging prior the the Tobacco Display Ban. Its introduction was rejected its introduction due to the lack of evidence that it would be effective in reducing levels of smoking among the UK population. What has changed? There has, to our knowledge, been no more research to suggest Plain Packaging would reduce rates and therefore still remains and ineffective deterrent.

Adult smokers have a preferred brand of cigarettes/tobacco and also an extended repertoire of brands if their preferred brand is unavailable. They are not interested in glitzy packaging or marketing gimmicks. There is no evidence to suggest that by standardising the look and feel of packs that this would dissuade adult smokers from purchasing tobacco.

Most available research points to peer pressure and other family members smoking as key drivers as to why young people try smoking. Successive governments have introduced measures to curb the uptake (Ban on Advertising and Promotions, pictorial health warnings, increase in age of sale, large tax increases, smoking ban in public places, etc. None of these has seen the incidence of young people smoking diminish and more investment should be placed on education by the Government.

"No-one starts smoking just because they like the look of a pack of cigarettes. People start because members of their family and friends smoke. Plain Packets will do nothing to meet the Governments health objectives"

 Lakeside Shopping Centre

## 2. Common Sense Legislation

UK Governments have introduced various measures to discourage smokers to stop,. However, there is very little change in smoking statistics over the past 20 years.

Recent legislation involves the introduction of the Tobacco Display Ban, applicable to all stores from 2015. We find it incredulous that more legislation is being considered without examining the results from previous legislation. Or is the Government admitting that the Tobacco Display Ban is yet another ineffective , ill-thought process in trying to prevent adults smoking.

Our readers would like common-sense legislation and have highlighted:

### **Crackdown on proxy purchasing**

It is illegal for an adult in England and Wales to purchase alcohol for minors but not tobacco. Why is this? Proxy purchasing should become illegal immediately.

### **Increased sentences for those who break the law**

Many who already break the law know the sentences they will receive and these are not seen as a deterrent. Stricter sentencing for all – counterfeiters, resellers and retailers - who break the law should be introduced.

### **One Responsible Government Department**

In the UK, we have HMRC which reports to the Treasury; the UK Border Agency and the police, which report to the Home Office; and licensing policy and trading standards officers, which report to local councils. Should we not have a dedicated department to combat a criminal fraternity that is costing the UK over £12m every day?

"If I sell alcohol to an adult who is buying for a minor, I can get prosecuted for proxy selling. If I sell a packed of cigarettes to the same man for a minor, that is not illegal. Abuse of all age-restricted products should carry the same punishment."



### 3. Health Risks

We all applaud what the Department of Health is trying to achieve in getting the UK to become a healthier nation. However the Government's policies in doing so are ultimately flawed.

Tobacco at the moment is a highly and tightly regulated industry. Tobacco manufacturers ensure that they offer products that have been developed and produced in safe environments.

The vast majority of retailers train their staff on how to adhere to a policy of No ID No Sale. Over the past ten years, at least 50,000 retailers have requested No ID No Sale packs – surely this is evidence that this campaign has extensive support from small convenience store owners and that they are committed to stamping out under age sales?

By introducing Plain Packaging, the Government will now be encouraging the illegal trade to counterfeit tobacco products. Previous counterfeit tobacco products have been shown to be eighty times more harmful than regulated duty-paid tobacco.

More and more consumers will buy cigarettes from the illegal trader if Plain Packaging comes into force and therefore smokers will develop more serious illnesses – which totally contradicts the Government's policy on public health.

“Counterfeiting in alcoholic spirits is widespread. Introducing plain packs on tobacco will only result in these highly sophisticated gangs shifting their attention to the tobacco trade”

## 4. Retailer Confusion & Risk

The Tobacco Display Ban has lead to longer tobacco transaction times in the large stores to which it applies. The introduction of Plain Packaging will only make this process lengthier.

If all packs are similar it will not only take retailers more time, but it will also mean that they are less customer facing as the vast majority of tobacco gantries are behind the till-point.

This will result in more theft from retailers and also more cases of violent abuse.

In almost every issue, Asian Trader reports on retailers who have had their stores raided and their lives endangered.

Crime is a major issue with many small shops seen as easy prey - cash rich but security poor. Plain packaging will mean the time spent with their back to customers would increase and the possibility of crime heightened.

Women are especially vulnerable as in many cases they are at till point and bear the brunt of abuse and violence.

"I have a responsibility to my staff to keep them safe. I believe that they will spend longer with their backs turned to the customer and, therefore, there will be increased security risks."

Leicester

## 5. The Illicit Trade

The Chancellor takes about £12b tax from tobacco sales annually via VAT. However he also loses almost £3bn via the black market – that is around a staggering £8 million per day to products that are non-duty paid.

Plain packaging will only add to this loss of revenue and, worse still, put the money in the pockets of criminal gangs who also supply a range of goods from fake alcohol to illegal DVDs and CDs.

It has been estimated that it costs £100,000 to smuggle one container of 10 million cigarettes from China into the UK. The profit on this container is a staggering £1.4m. It has been proven that these same 'criminal masterminds' use the profits from cigarette smuggling to fund much more sinister activities such as prostitution and people smuggling.

By introducing Plain Packaging the Government is taking the sale of legitimate tobacco products out of the hands of the professional retailer and into the hands of the illicit trader who does not care who he sells to.

The tobacco category accounts for around 25% of the typical convenience retailers revenue but up to 50% for a typical newsagent. An escalation in the illicit trade at the expense of the legitimate retailer, which would happen after the introduction of plain packaging, would result in more store closures and loss of jobs.

"Non Duty Paid will thrive around street corners and out of pubs. The illicit trade will thrive and the smugglers will be laughing all the way to the bank"

**Leicester**

## 6. Effect on Local Economy

Small businesses are the life blood of the economy and also their community. On average, tobacco accounts for 25-50% of retailers' total revenue and it is a key footfall driver which means that turnover across the store benefits.

A smokers' average spend is significantly more than a non-smoker as they pick up other impulse purchases so it will not only be tobacco sales that suffer.

Potential loss of this via illegal sales would result in:

**Job losses** from the local community as local retailers employ local people

**Cash flow problems** which will impact on local suppliers

**Possible closure** for many small stores which support the local community, charities and schools.

Local stores employ on average 4 to 5 people. If even one quarter of our retailers had to shed one member of staff, this would result in over 12,000 job losses at a time when the country could not afford it.

Add to this the other companies in the supply that the introduction of Plain Packaging will impact on and perhaps upwards of 100,000 jobs could be lost.

This would have a devastating effect on local communities in addition to significantly adding to the monies paid out by government in Unemployment Benefits.

"Villages have lost their butchers, bakers, post offices, fishmongers, and greengrocers. Now ill-informed legislation will ensure that the newsagents and grocers go the same way – leaving that community stranded"

Gravesend



Guildhall, Quayside, Newcastle upon Tyne NE1 3AF

Tel: 0845 [REDACTED]

Website: [www.northeastcouncils.gov.uk](http://www.northeastcouncils.gov.uk)

Chief Executive: Melanie Laws

5 July 2012

Department of Health  
Richmond House  
79 Whitehall  
London  
SW1A 2NS

To: Department of Health  
[REDACTED] ([gsi.gov.uk](mailto:[REDACTED]@gsi.gov.uk))

## **ANEC SUBMISSION SUPPORTING PLAIN, STANDARDISED PACKAGING OF TOBACCO PRODUCTS**

The Association of North East Councils is the representative body for local government in the North East. It encompasses all 12 local authorities in the region, throughout Northumberland, Tyne and Wear, Durham and the Tees Valley, on issues of concern to them and the communities they serve. It is a cross-party organisation, with all of its Members democratically elected and accountable politicians.

The Association wishes to express its strong support for measures to introduce plain, standardised packaging for all tobacco products in the UK as part of the Government consultation. This co-ordinated response is submitted on behalf of our member authorities who in addition will be submitting their individual responses.

### **Reducing smoking in the North East.**

The NHS and local authorities in the North East have historically worked together to tackle smoking through tobacco control alliances and through the Fresh office. This was set up in 2005 and is based on international best practice to provide expertise and a range of practical support to councils and the many partners involved in tackling tobacco. It also delivers region-wide programmes and helps to co-ordinate local work to ensure effective messages on the harm of smoking and benefits of quitting reaches the people of the North East.

Chair: Cllr [REDACTED]

Vice Chairs: Councillor [REDACTED], Elected Mayor [REDACTED], Councillor [REDACTED]

The Association has played a pivotal role in previous major tobacco control initiatives including our work to build the case for comprehensive smokefree legislation. Our councils also play an integral part in ensuring both high public support and subsequent high compliance with this ground breaking legislation.

From being the part of the country with the worst smoking rates, this joined up approach has resulted in the fastest and largest reduction in smoking of any English region which was recognised with receipt of the Gold Medal in the Chief Medical Officer's Award for Public Health. The North East's successful model is now used as a template in other regions and jurisdictions and the approach was highlighted as good practice in the Government's National Tobacco Plan.

However, at a time when public health is moving to local authorities, it is our concern that smoking remains our biggest avoidable public health problem and contributor to health inequalities. We are committed to our focus on tobacco control recognising the significant impact of smoking within our communities but also that we have made good progress across the North East and need to maintain this 'downward pressure' over the next few years. We seek solutions to make a greater impact to both encourage quitting among smokers and also to prevent new smokers starting.

### **The harm of tobacco**

Smoking still remains the largest cause of premature death, disease and health inequalities in the North East, responsible for one in five deaths of adults over 35 and killing 11 people a day. As well as an intolerable burden on health, this places a strain on our economy, costing at least £210m a year to the NHS and employers through treating smoking related conditions, second hand smoke and the loss to businesses through smoking related sickness and absenteeism. The North East Chamber of Commerce has previously commented on the detrimental economic cost and "staggering impact" that smoking has on regional businesses to a cost of £70m a year.

At current smoking levels, there will be approximately 4,195 deaths in the North East each year – equating to 282.5 deaths per every 100,000 people in the North East. This is substantially higher than the England average of 216.

For these reasons we believe plain, standardised tobacco packaging to be a proportionate response to these problems and to help in reducing the appeal of smoking to young people and to be an appropriate next step in helping to prevent uptake.

### **Support for Plain, Standardised packaging**

We fully support introducing in the UK the same form of plain packaging being implemented in Australia later this year - tobacco products with no branding, a uniform colour and standard font and text for writing on the pack. We believe these would bring public health benefits over and above those from current initiatives in the UK.

Tobacco packaging is one of the tobacco industry's leading promotional tools. Research suggests plain packaging would reduce the attractiveness to young people, increase the impact of health warnings and reduce false and misleading messages that one type of cigarette is less harmful than another.

Tobacco use starts not as an adult choice but in childhood with experimentation at an age when children have little grasp of the health risks from middle age nor the speed with which addiction takes hold. Around 340,000 children in the UK try their first cigarette every

year. Statistics from Fresh show the average age current North East smokers say they started was just 15, with 43% starting smoking between the ages of 10 and 14.

Based on this level of harm to individuals, communities and the North East region, we believe plain, standardised packaging of tobacco products would overall have a positive effect on smoking related attitudes, beliefs, intentions and behaviours, particularly among children and young people. It would:

- discourage children and young people from starting to smoke – tobacco firms invest huge sums of money into advertising and marketing their products to recruit new customers, who are nearly always children. Branded tobacco products are viewed as more appealing among young people than plain, standardised packs, which are viewed as less attractive, containing more poisons and of poorer taste. We believe this would also impact on peer pressure, reducing the sense of pride young people appear to take in sharing more glamorous packs with friends;
- reduce the appeal of tobacco products to existing consumers and encourage more people to stop smoking – plain, standardised packs communicate the harms of smoking far more effectively than branded products, with the health messages more obvious. Packs in white or silver colours (former “low tar” brands) give the false impression to smokers that that some brands are less harmful than others, reducing intentions to quit;
- make health warnings more prominent. The striking impact of current brands reduces the impact of health warning messages.

We believe that it is misleading that an addictive product that contains a toxic mix of over 4000 chemicals, including at least 80 known to cause cancer, is currently promoted through innovative, colourful packaging in a similar way to breakfast cereals, energy drinks and confectionary.

### **Public support**

There is high public support to protect children from tobacco marketing and to do more to discourage children from taking up smoking. The Smoke Free England survey on behalf of Action on Smoking and Health 2012 found 66% of adults in the North East shown an example of a plain standardised pack supported introducing these in the UK. A different survey by Cancer Research UK in the North East found that 85% of adults are opposed to any type of tobacco promotion.

We call for Government action to adopt this measure and help to make smoking history for more children in the North East.

### **Trading standards backing**

In addition, we echo the response from the North East Trading Standards Association (NETSA), which represents the views of trading standards officers from local authorities across the North East. Under age sales enforcement has been a key activity in this region for a number of years as tobacco use starts as a childhood addiction.

We support NETSA's views that standardised packaging will not fuel illegal tobacco, in that counterfeiters can already copy highly sophisticated products and that standardised packs are no easier to replicate than existing branded products.

We note that a significant proportion of illegal tobacco being seized in the North East over the past two years is not counterfeit but mass manufactured brands made purely for the illegal market, not legally sold in the UK, and very easy to spot. In terms of convenience to

retailers, we note that the only peer reviewed study available on this matter found that the retail sale of standardised tobacco products was quicker than the retail sale of branded tobacco products.

This response and the individual submissions made by our member authorities represent the strong sense of concern felt by councillors and the communities in the North East. We firmly support the proposals for the introduction of plain tobacco packaging as further measure to help us prevent our children becoming addicted to smoking and ending the long term harm this causes to the health and wellbeing of the North East.

Yours sincerely

A large black rectangular redaction box covering the signature of the councillor.

Councillor   
Chair of the Association of North East Councils



**Atherton Children's Centre**  
**Formby Avenue**  
**Atherton**  
**Manchester**  
**M46 0HX**

Tobacco Packs Consultation  
Department of Health  
7th Floor Wellington House  
133-155 Waterloo Road  
London SE1 8UG

Via email to [REDACTED]@gsi.gov.uk

12<sup>th</sup> July 2012

Dear Sir/Madam,

**DH Consultation on standardised packaging of tobacco products**

I write on behalf of my Children's Centre in response to the above consultation. As a Children's Centre we regularly see and support many parents of pre-school age children and their families locally. A key role of our Children's Centre is to support the health improvement of families and the health and wellbeing of children. A significant proportion of the parents visiting our centre do smoke and we aim to provide educational activities and support for them to both quit and to protect their children from secondhand smoke by choosing to smoke outside when at home.

The consultation on plain tobacco packaging is welcomed and we would support its introduction as a measure to prevent more children and young people from starting to smoke. Whilst parental smoking and peer pressure are clearly factors in young people taking up smoking, we believe the brightly coloured packaging does play a part – children are attracted to these just like other brands, especially as they become teenagers. 83% of people who try smoking do so before they turn 14 and we support any action that ensures they cannot be targeted by advertising at this young age.

We will play our part in helping parents who want to quit to do so with NHS support, and to educate about the dangers of secondhand smoke on their young families. Our work and the work of others in the NHS and Local Government protecting families from the dangers of tobacco smoke can only be effective if we have outside support – any policy that will impact on young peoples' smoking, like the introduction of plain, standardised cigarette packaging, is one we will support.

We call on you to take forward this policy and improve the lives of our children and young people everywhere.

Kind regards,

[REDACTED]  
[REDACTED]  
[REDACTED]  
Peterborough  
[REDACTED]

Tobacco Packs Consultation  
Department of Health  
7<sup>th</sup> Floor  
Wellington House  
133-135 Waterloo Road  
London  
SE1 8UG

02 July 2012

Dear Sir / Madam

**'Consultation on standardised packaging of tobacco products'**

As an employee of Payne, a supplier of packaging and security solutions, I am writing to express my concerns to the Department of Health's (DoH) Consultation on standardised packaging of tobacco products.

I fully support the responsible marketing of legally-sold tobacco products according to appropriate legislation, as well as exploring all opportunities to reduce the effects of smoking. However I do believe that the proposals for plain packaging outlined by the above consultation will have a number of unintended consequences particularly in relation to illicit trade and potential impacts on business.

*Accordingly, I strongly support Option 1 as highlighted in the consultation, namely 'Do nothing about tobacco packaging and maintain the status quo for tobacco packaging.'*

Advocates of plain packaging feel it may help to discourage smoking. But there are serious concerns as to how this could instead encourage an even greater influx of illicit tobacco products, with far increased health risks, as smokers potentially turn to the black market and unregulated counterfeit products.

Without the need or effort required to copy genuine packaging, counterfeit tobacco would become much more difficult for the user to detect. Plain packaging would make counterfeiting easier and cheaper, and detection more onerous and expensive.

A broad range of organisations have set out their concerns on the proposals including The British Brands Group and The Anti-Counterfeiting Group who have issued a joint statement – 'Plain packaging: a leap in the dark', the International Chamber of Commerce, UNITE, The Adam Smith Institute, Transcrime and The Institute of Economic Affairs amongst others and I would urge the government to take time to review these opinions in their review

On the basis of all the above, I ask the DoH to refrain from changes to Tobacco Packaging and support Option 1 - *'Do nothing about tobacco packaging (i.e., maintain the status quo for tobacco packaging).'*

Thank you for the opportunity of contributing and taking account of my views as part of this UK consultation.

Yours sincerely;  
[REDACTED]

5767  
B.G.Benton Ltd  
Yeowart Business Centre  
Bellbrook Estate  
Bell Lane  
Uckfield  
East Sussex  
TN22 1QL

DOH Tobacco Packs Consultation  
Department of Health  
7<sup>th</sup> Floor  
Wellington House  
133-155 Waterloo Road  
London  
SE1 8UG

5th July 2012

Dear Sirs,

I write to put forward my opposition to the proposals to introduce standardised tobacco packaging.

Having worked in the tobacco industry for over 35 years I have a wealth of knowledge in this sector.

My business is only just surviving the effects of all recent legislation on the control of tobacco products. I believe this proposal would be sufficient to close my business down as the tobacco market would undoubtedly be flooded with illicit & counterfeit cigarettes. For many years now, my sector of the tobacco industry has been plagued by non-duty paid illicit tobacco.

It is well documented illicit & counterfeit tobacco accounts for almost 30% of UK tobacco consumption at a massive loss to the exchequer. Standardised tobacco packaging would without doubt 'open the doors' to the counterfeiters. The impact of this would be critical on the survival of my own particular business as the market would be flooded with cheap counterfeit cigarettes. This in itself would lead to a number of different health & social issues & no doubt fatalities.

Again, it is well documented that counterfeit goods are never quality controlled and or necessarily fit for human consumption! Counterfeit goods are sold on street corners, pub car parks, housing estates, motorway service stations, even in some poor quality convenience stores; but essentially anywhere & everywhere to anyone who has the cash – even children.

Illicit tobacco goods are sold without regulation across the UK in massive volumes and this proposal will only promote this lawless activity.

In real terms, the impact of standardised tobacco packaging would be negative from a number of different aspects. Aside from all the problems it will create in the daily operation of my own business; the overriding impact will be massive increase in counterfeit tobacco products.

This legislation would 'open the doors' to both UK & foreign counterfeiting criminals. Illicit tobacco in the UK is rife, completely unregulated & should be stopped. All duty paid tobacco products sold through my business are controlled and are subject to strict regulation and age verification checks yet I will be penalised if this proposal is enacted. Is this fair and equal? This is surely an ill thought out proposal.

Current tobacco packaging is not misleading. The majority of the packaging area is already given up to health related information. The job appears to be already done.

Furthermore, from a practical perspective stock control & operations would be more difficult as brands would be difficult to distinguish from each other. No doubt this would lead to errors in transactions and customer dissatisfaction.

To allow standardised tobacco packaging in my opinion is at best naive, at worst bordering on being criminal as this will lead to massive increase of criminal activity at the expense of genuine bona fide businesses like mine.

Current tobacco policies are very tight and further legislation is not necessary. The increase of this uncontrolled tobacco in the UK would have the opposite to the desired effects therefore increasing the availability of uncontrolled illicit / counterfeit tobacco products on the streets of the UK. This in itself effectively discriminates against lawful UK tobacco retailing businesses like my own, in favour of criminal activity.

My recommendation would be to maintain the status quo and legislate against the criminals of the illicit tobacco trade.

Yours Sincerely,

[REDACTED]

018 [REDACTED]

**From:** [REDACTED]@durham.gov.uk>  
**Sent:** 12 June 2012 13:54  
**To:** Tobaccopacks  
**Subject:** SUBMISSION SUPPORTING PLAIN, STANDARDISED PACKAGING OF TOBACCO PRODUCTS

## **SUBMISSION SUPPORTING PLAIN, STANDARDISED PACKAGING OF TOBACCO PRODUCTS**

To whom it may concern

Area Action Partnership's or AAPs for short are a new way of involving local residents in the work of Durham County Council, Town and Parish Councils, Housing, Health, Police and Emergency Services, local businesses and the voluntary and community Sector, placing you at the heart of local decision making. There are 14 AAP's across County Durham.

We would like to express our strong support for measures to introduce plain, standardised packaging for all tobacco products in the UK as part of the current Government consultation.

We fully support introducing here in the UK the same type of plain packaging that is being implemented in Australia in December 2012 - tobacco products with no branding, a uniform colour and standard font and text for writing on the pack. We believe these would bring public health benefits over and above those from current initiatives in the UK.

Around 340,000 children in the UK try their first cigarette every year. Smoking starts not as an adult choice but in childhood through experimentation, at an age when children have little grasp of the health risks from middle age nor the speed with which addiction takes hold. The average age for smokers starting in the North East is just 15, with 43% of smokers starting between the ages of 10 and 14.

Smoking still remains 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. Within County Durham the cost is estimated to be £21 million a year and smoking attributable deaths in County Durham are higher than the north east average.

Based on this level of harm to individuals, our communities and the North East region, we believe plain, standardised packaging of tobacco products to be a proportionate response that would:

- Discourage young people from starting to smoke – tobacco firms invest huge sums of money into advertising and marketing their products to recruit new customers, who are nearly always children. Branded tobacco products are viewed as more appealing among young people than plain, standardised packs, which are viewed as less attractive, containing more poisons and of poorer taste.
- Encourage people to stop smoking – plain, standardised packs communicate the harms of smoking far more effectively than branded products, with the health messages more obvious. Packs in the white or silver colours of former "low tar" brands give the false impression to smokers that they can minimise the risks of their smoking, delaying or replacing quitting intentions.
- Discourage people who have quit or are trying to quit smoking from relapsing – the temptation of brands increase the pressure on former smokers not to stay quit.
- Reduce people's exposure to smoke from tobacco products.

Having seen the cigarette packaging the Bishop Auckland and Shildon AAP believes it is wrong that a product that contains over 4000 chemicals, including at least 80 known to cause cancer, is currently marketed through these innovative, colourful packaging, similar to the way breakfast cereals, energy drinks or confectionary are marketed.

The Bishop Auckland and Shildon AAP would like to offer their support to protect children from tobacco marketing to discourage children from taking up smoking. We therefore call for Government action to adopt this measure and help to make smoking history for our children.

Yours Faithfully

Bishop Auckland and Shildon AAP

Thank You

[REDACTED]  
Area Action Partnership Support Officer  
Bishop Auckland and Shildon AAP

Durham County Council  
Old Bank Chambers  
45 Market Place  
Bishop Auckland DL14 7NP

Tel. 01388 761 569 (Direct Line)

Email address is: [REDACTED]@durham.gov.uk  
or  
[REDACTED]@durham.gov.uk

Webpages : [www.durham.gov.uk/bishopandshildonaap](http://www.durham.gov.uk/bishopandshildonaap)

[Click here to find out what AAPs are and what they do.](#)

---

Help protect our environment by only printing this email if absolutely necessary. The information it contains and any files transmitted with it are confidential and are only intended for the person or organisation to whom it is addressed. It may be unlawful for you to use, share or copy the information, if you are not authorised to do so. If you receive this email by mistake, please inform the person who sent it at the above address and then delete the email from your system. Durham County Council takes reasonable precautions to ensure that its emails are virus free. However, we do not accept responsibility for any losses incurred as a result of viruses we might transmit and recommend that you should use your own virus checking procedures.

This email was received from the INTERNET and scanned by the Government Secure Intranet anti-virus service supplied by Cable&Wireless in partnership with MessageLabs. (CCTM Certificate Number 2006/04/0007.)

DH users see Computer virus guidance on Delphi under Security in DH, for further details. In case of problems, please call the IT support helpdesk.

**British Medical Association**  
0300 13 123 3 [bma.org.uk/northernireland](http://bma.org.uk/northernireland)

16 Cromac Place, Cromac Wood, Ormeau Road, Belfast, BT7 2JB

T [REDACTED]



Tobacco Packs Consultation  
Department of Health  
7<sup>th</sup> Floor Wellington House  
133-155 Waterloo Road  
London  
SE1 8UG

Our Ref: 04/12/198 EXTUK

5 July 2012

Dear Sir/Madam

### **Consultation on standardised packaging of tobacco products**

The British Medical Association (BMA) is an independent trade union and voluntary professional association which represents doctors and medical students from all branches of medicine throughout the UK. With a membership of over 149,000, we promote the medical and allied sciences, seek to maintain the honour and interests of the medical profession and promote the achievement of high quality healthcare.

BMA (NI) represents over 70% of the medical profession in Northern Ireland with almost 4,900 members from every branch of practice. We represent the collective voice of the profession regarding improving and protecting public health.

The Association welcomes the opportunity to respond to your consultation on the standardised packaging of tobacco products. The BMA has a long history supporting comprehensive tobacco control measures and welcomes this consultation and its focus on the need to reduce the uptake of smoking among young people. Through its Board of Science, the BMA has published several reports on tobacco control including *Forever cool: the influence of smoking imagery on young people* (2008) and *Breaking the cycle of children's exposure to tobacco smoke* (2007). These reports have been used to inform this response and can be accessed at <http://bma.org.uk/tobacco>

Northern Ireland Secretary: [REDACTED]  
Chief Executive/Secretary: [REDACTED]

Registered as a Company Limited by Guarantee. Registered No. 8848 England  
Registered office: BMA House, Tavistock Square, London WC1H 9JP  
Listed as a Trade Union under the Trade Union and Labour Relations Act 1974.



**STANDING UP  
FOR DOCTORS**

Standardised packaging has also been shown to increase the impact and believability of health warnings.<sup>14, 22, 23, 24</sup> Evidence from the tobacco industry shows that the colours, graphics, fonts, shapes and texture of packaging are all used to convey characteristics of the product, such as strength or levels of tar.<sup>9, 25, 26</sup> These messages may lead some consumers to believe certain products carry a reduced risk of harm.<sup>9, 17, 27</sup> When lighter colours of tobacco product packaging are used, as demonstrated by the Public Health Research Consortium report, the products are perceived to be less harmful than when darker colours are used.<sup>23</sup> Professor Robert West, Director of Tobacco Research at University College London, said lighter coloured packs were perceived as healthier and the presence of branding reduced the impact of health warnings. He said: "Tobacco companies claim they don't market their products to children. But the truth is their products are attractive to children..."

Standardised packaging will reduce the ability of tobacco packaging to distract and mislead consumers. Care should be taken to ensure that the standard form of packaging design is dull and unappealing. It is essential that plain packaging is eventually extended to other related products, including e-cigarettes, to prevent brand stretching by the tobacco industry.

There is emerging evidence that the public support the introduction of standardised packaging. Surveys undertaken in 2012 by YouGov in England, Ireland and Scotland found that a significant majority of adults support standardised packaging (62% in England, 64% in Ireland and 64% in Scotland), and only 11 per cent in each country opposed the measure - even among smokers for every five who oppose plain packaging, there are six who support it.<sup>28, 29</sup>

The BMA believes that the introduction of standardised packaging is a proportionate response to the adverse health and social harms caused by tobacco. While this measure is likely to reduce sales of tobacco products in the long-term, there is no evidence that there would be significant trade, competition or legal implications. Concerns have been expressed that standardised packaging will increase illicit trade as the products will be easier to counterfeit.<sup>30</sup> As the proposals for standardised packaging include all the markings and other features that are required to assist with the identification of genuine products, we do not believe it will be any easier to produce and sell counterfeit products.

According to Cancer Focus Northern Ireland, currently (2010/11) 24% of adults in Northern Ireland smoke, this compares with 23% in 2007/8. The DHSSPSNI Tobacco Control Strategy sets a prevalence target of 15% for 2020. It is clear that if this target is to be met a comprehensive and



## References

- <sup>1</sup> Peto R, Lopez AD, Boreham J et al (2012) Mortality from smoking in developed countries, 1950-2005 (or later). (updated March 2012). (NI statistics – DHSSPS website)
- <sup>2</sup> Jha P, Peto R, Zatonski W et al (2006) Social inequalities in male mortality, and in male mortality from smoking: indirect estimation from national death rates in England and Wales, Poland, and North America. *The Lancet* **368**: 367-70.
- <sup>3</sup> Joossens L & Raw M (2011) *The Tobacco Control Scale 2010 in Europe*. 5<sup>th</sup> European Conference on Tobacco or Health, 28-30 March, Amsterdam, Netherlands.
- <sup>4</sup> Office for National Statistics (2008) *General Household Survey, 2006*. London: The Stationery Office.
- <sup>5</sup> British Medical Association (2008) *Forever cool: the influence of smoking imagery on young people*. London: British Medical Association.
- <sup>6</sup> Thomson G, O'Dea D, Wilson N, et al (2010) Government paralysis? Stable tobacco prices mean preventable deaths and disease persist, along with health inequalities in New Zealand. *CORD Conference Proceedings* **123**: 74-80.
- <sup>7</sup> Office for National Statistics (2010) *General lifestyle survey*. London: The Stationery Office.
- <sup>8</sup> Pollay RW (2000) Targeting youth and concerned smokers: evidence from Canadian tobacco industry documents. *Tobacco Control* **9**: 136-47.
- <sup>9</sup> Wakefield M, Morley C, Horan JK et al (2002) The cigarette pack as image: new evidence from tobacco industry documents. *Tobacco Control* **11**: 173-80.
- <sup>10</sup> Wakefield M & Letcher T (2002) My pack is cuter than your pack. *Tobacco Control* **11**: 154-6.
- <sup>11</sup> Goldberg ME, Liefeld J, Kindra G et al (1995) *When packages can't speak: Possible impacts of plain and generic packaging of tobacco products. Expert panel report*. Prepared for Health Canada. Canada: University of Toronto.
- <sup>12</sup> Rootman I & Flay BR (1995) *Study on youth smoking: plain packaging, health warnings, event marketing and price reductions. Key findings and figures. Report*. Canada: University of Toronto.
- <sup>13</sup> Carr-Greg MRC & Gray AJ (1993) Generic packaging: a possible solution to the marketing of tobacco to young people. *World Smoking and Health* **18**: 11-3.
- <sup>14</sup> Beede P & Lawson R (1992) The effect of plain packages on the perception of cigarette health warnings. *Public Health* **106**: 315-22.
- <sup>15</sup> Pollay RW (2007) More than meets the eye: on the importance of retail cigarette merchandising. *Tobacco Control* **16**: 270-4.
- <sup>16</sup> McNeal JU & Ji M F (2003) Children's visual memory of packaging. *Journal of Consumer Marketing* **20**: 400-27.
- <sup>17</sup> Centre for Tobacco Control Research (2012) *The packaging of tobacco products*. Stirling: Centre for Tobacco Control Research.
- <sup>18</sup> Devlin E, Eadie D & Angus K (2003) *Tobacco marketing and young people*. Stirling: Centre for Tobacco Control Research.
- <sup>19</sup> Cummings KM, Morley CP, Horan, JK, Steger C & Leavell N-R (2002) Marketing to America's youth: evidence from corporate documents. *Tobacco Control*, **11**: i5-i17.
- <sup>20</sup> Moodie C, Stead M & Bauld L et al (2012) *Plain tobacco packaging: a systematic review*. Stirling: Public Health Research Consortium.
- <sup>21</sup> British Medical Association (2007) *Breaking the cycle of children's exposure to tobacco smoke*. London: British Medical Association.
- <sup>22</sup> Centre for Behavioural Research in Cancer (1992) *Health warnings and product labelling on tobacco products*. Melbourne: Anti-Cancer Council of Victoria.
- <sup>23</sup> Centre for Health Promotion (1993) *Effects of plain packaging on the image of tobacco products among youth*. Canada: University of Toronto.
- <sup>24</sup> Goldberg ME, Liefeld J & Madill J et al (1999) The effect of plain packaging on response to health warnings. *American Journal of Public Health* **89**: 1434-5.
- <sup>25</sup> DiFranza, JR, Clark DM & Pollay RW (2002) Cigarette package design: opportunities for disease prevention. *Tobacco Induced Diseases*, **1**: 97-109.
- <sup>26</sup> Pollay RW & Dewhirst T (2002) The dark side of marketing seemingly 'Light' cigarettes: successful images and failed fact. *Tobacco Control* **11**: i18-i31.
- <sup>27</sup> Hastings GB & MacFadyen L (2000) *Keep smiling. No one's going to die: an analysis of internal documents from the tobacco industry's main UK advertising agencies*. Stirling: Centre for Tobacco Control Research.
- <sup>28</sup> Smokefree Action Coalition press release (16.4.12) *SFAC welcomes consultation on plain packaging*.
- <sup>29</sup> Ash Scotland press release (24.4.12) *Poll shows Scots support for plain packaging, even amongst smokers*.
- <sup>30</sup> Snowdon C (2012) *Plain packaging: commercial expression, anti-smoking extremism and the risks of hyper-regulation*. Adam Smith Research Trust: London.