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# Consultation on the introduction of regulations for standardised packaging of tobacco products

Summary report

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# Consultation on Introducing Regulations for Standardised Packaging of Tobacco Products: Summary Report

**Prepared by**  
Department of Health Tobacco Programme

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# 1. Executive summary

- 1.1. This consultation was to inform decision-making by the Department of Health and Devolved Administrations on whether to introduce standardised packaging of tobacco products. We wanted to hear the views of interested people, businesses and organisations. We were particularly seeking new, or additional, information relevant to standardised packaging that has arisen since the 2012 consultation.
- 1.2. The Children and Families Act 2014 provides the Secretary of State with powers to regulate the retail packaging of tobacco products. The primary purpose of standardised packaging is to promote public health. Although public health is a devolved matter, the Children and Families Act 2014 provides the power for the Secretary of State to make regulations for the whole of the UK with the consent of ministers in Scotland, Northern Ireland and Wales, where those regulations have provisions that are within the competence of their devolved Parliament or Assembly.
- 1.3. To provide maximum clarity, the consultation included draft regulations which set out the proposed requirements for standardised packaging.
- 1.4. This report has been prepared and published by the Department of Health to provide an overview of the responses received and a summary of the main themes that emerged in response to the specific questions asked in the consultation document.

## 2. Overview of the consultation

### Purpose of consultation

- 2.1. The Department of Health and Devolved Administrations jointly ran a public consultation between 26 June and 7 August 2014, inviting views on a set of draft regulations for the introduction of standardised packaging of certain tobacco products. The consultation asked four questions about; 1) the Chantler review, 2) whether any new evidence is available, 3) draft regulations and 4) the consultation-stage impact assessment. The purpose of this consultation was to inform final decision making by the Department of Health and Devolved Administrations.
- 2.2. In 2012, the Department of Health and Devolved Administrations consulted on a policy proposal that would require the packaging of tobacco products to be standardised, with the aim of improving public health by reducing the use of tobacco. A summary report of the 2012 consultation was published in July 2013 and can be found at: <https://www.gov.uk/government/consultations/standardised-packaging-of-tobacco-products>
- 2.3. This second consultation asked, in particular, for new or additional information relevant to standardised packaging that has arisen since the 2012 consultation. The consultation document, which sets out the policy background and objectives in full, can be found at: <https://www.gov.uk/government/consultations/standardised-packaging-of-tobacco-products-draft-regulations>
- 2.4. This report has been prepared and published by the Department of Health to provide an overview of the responses received and to summarise the points made during the consultation. Issues raised have been organised according to theme, under each consultation question as appropriate.
- 2.5. The Department of Health engaged TONIC consultants Ltd to assist with the collating and undertaking initial analysis of consultation responses. The Department of Health and Devolved Administrations undertook further analysis and full consideration of the issues raised.
- 2.6. Given the number and breadth of consultation responses, this report cannot include every single individual comment received. The report does, however, provide an overview of the responses received and reflects the main themes that emerged in response to the questions asked in the consultation document.

### Responses Received

- 2.7. A total of 137,711 responses were received, made up of 1,307 detailed responses (from businesses, organisations, the public and health and social care professionals) and 136,404 campaign responses (i.e multiple copies of the same response endorsed by individuals).
- 2.8. As with previous consultations on this issue, respondents fell into two distinct groups:
  - Those who supported the introduction of standardised packaging of tobacco products – consisting predominantly of health charities, non-governmental organisations, local authorities and their public health and

trading standards departments, NHS bodies, and health and social care professionals.

- Those who opposed the policy – largely made up of businesses involved in the tobacco industry, retail, design, packaging, intellectual property/trademarks and their relevant trade associations.

## Limitations to elicit representative samples of public opinion

- 2.9. The consultation process was not intended or designed to elicit representative samples of public opinion, instead it sought information, comments and views on the consultation questions, draft regulations, impact assessment and equality analysis.
- 2.10. It is in the nature of open consultation exercises that, generally, it is only those who already have an interest in the subject to respond to the questions. The nature of consultation exercises means that respondents are self-selecting, and cannot therefore be considered to be a representative sample of public opinion.



## 3. Overview of responses

3.1. This chapter provides an overview of the responses received to this consultation.

### Respondent Demographics

3.2. Consultation responses came from the following groups:

- 392 members of the public
- 37 health or social care professionals
- 624 businesses or sole traders
- 254 organisations

3.3. The following tables show further demographics relating to respondents to the consultation. The majority of responses related to the UK as a whole.

Country response relates to	Number	%
UK	1,224	94%
England	69	5%
Scotland	10	0.8%
Wales	3	0.2%
Northern Ireland	1	0.1%
<b>Total</b>	<b>1,307</b>	

*Note: Where no specific answer had been given to this question in a response, the assumption was that this related to the entire UK and has been recorded as such in the table above.*

3.4. The majority (55%) of responses came from people, businesses or organisations with no declared links to the tobacco industry. Around a third of respondents, however, declared their links to the tobacco industry, and 15% did not give an answer to this question.

Tobacco Links	Number	%
Yes	399	31%
No	718	55%
No answer	190	15%
<b>Total</b>	<b>1,307</b>	

3.5. The majority of responses from businesses came from tobacco retailers (89%).

Type of Business	Number	% of businesses that responded
Tobacco retailer (supermarket)	1	0.2%
Tobacco retailer (convenience store)	533	85.4%
Tobacco retailer (other type of shop or business)	20	3.2%
Specialist tobacconist	1	0.2%
Duty-free shop	2	0.3%
Wholesale tobacco seller	14	2.2%
Tobacco manufacturer	12	1.9%
Retailer not selling tobacco products	0	0.0%
Pharmaceutical industry	0	0.0%
Business involved in the design or manufacture of packaging	21	3.4%
Other	20	3.2%
<b>Total</b>	<b>624</b>	

3.6. Responses from organisations came mainly from local authorities (30%), health charities or NGOs operating at a national level (14%), and local tobacco control alliances (12%).

Type of Organisation	Number	% of organisations that responded
NHS organisation	10	3.9%
Health charity/NGO (working at national level)	35	13.8%
Local Authority	67	26.4%
Local Authority Trading Standards or Regulatory Services Department	10	3.9%
Local tobacco control alliance	30	11.8%
Retail representative organisation	14	5.5%
Industry representative organisation	16	6.3%
Other type of business representative organisation	0	0.0%
University or research organisation	6	2.4%
Other	66	26.0%
<b>Total</b>	<b>254</b>	

3.7. Campaign responses came from the following:

<b>Organising Group</b>	<b>Format</b>	<b>Campaign Name</b>	<b>Number received</b>
British American Tobacco Pension Company	Standard Letter & Email	British American Tobacco Pensioners	824
FOREST	Standard email, standard letter, & signed petition	Hands off our packs	123,269
Imperial Tobacco	Invitation to participate in campaign letter signed by participants	Imperial Tobacco letter to pensioners	7
UNITE	Campaign Postcard	UK Jobs At Risk	2,290
Tobacco Retailers Alliance	Campaign Postcard	No to Plain Packs	10,001
Local Campaign 1 (with no clear organising group)	Standard Letter	No name given to campaign	5
Local Campaign 2 (with no clear organising group)	Standard Letter	No name given to campaign	4
Local Campaign 3 (with no clear organising group)	Standard Letter	No name given to campaign	4

## 4. Responses to the consultation

- 4.1. People were invited to respond to four consultation questions in the consultation document. This chapter summarises the key themes that emerged from each of these questions.

### Question 1

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

- 4.2. Responses to this question discussed both the Chantler report and emerging evidence from Australia.

### Chantler Report Process and Findings

- 4.3. The discussion around the Chantler report was polarised, with comments received relating to both the methods and findings of the evidence.
- 4.4. Health NGOs, local authorities, public health departments and health and social care professionals generally welcomed the findings and endorsed the methods and evidence used in the Review. It was stated that the Review provides a full and accurate description of the available evidence concerning packaging. The conclusion of such responses was that the case has now been made for action and that standardised packaging should therefore be implemented.
- 4.5. Some respondents provided further supporting evidence to assert that the introduction of standardised packaging would be effective. For example, many responses referred to the report by Professor David Hammond for the Irish Department of Health which they believed supports the Chantler Review's conclusions. Public Health England also conducted a search of published peer reviewed literature from 2012 onwards to inform their response, concluding that tobacco branding is a powerful marketing tool and that standardised packaging is less appealing to young people. Other new evidence included research conducted on behalf of the Irish Heart Foundation and the Irish Cancer society, which concluded that tobacco in standard packaging was less appealing to teenagers, and has strong potential to influence smoking choices and behaviours among young people.
- 4.6. Others, including respondents from the tobacco industry, took a different view, stating that the Chantler Review does not provide a sufficient evidential basis upon which to introduce legislation. They argue that the report relies on unsound and hypothetical evidence and incorrectly concludes that branded packaging contributes to increased tobacco consumption. Some also argued that the Chantler Review was

not independent, relying on expert opinions from tobacco-control advocates or those with conflicts of interest and dismissing evidence which does not support the policy.

- 4.7. The responses from the tobacco industry also felt that the Chantler report relied too heavily on the Sterling Review, and believed that full account had not been taken of the data available from Australia. Some responses referred to studies which the Chantler report had not considered in full, such as the KPMG report on the illicit tobacco market in Australia. They also pointed to a report from London Economics for Philip Morris International, which concludes that the data from Australia does not demonstrate a change in smoking prevalence following the introduction of plain packaging.
- 4.8. Such respondents also stated that the Chantler report failed to address issues wider than public health sufficiently, though acknowledged that these were largely outside of the terms of reference of the review.

### Evidence from Australia

- 4.9. Many respondents set out the evidence that they felt showed that the introduction of standardised packaging in Australia has either been successful or unsuccessful. A number then also sought to discredit the opposing view and the evidence supporting that view.
- 4.10. One of the issues raised was the impact on smoking prevalence. Some referenced statistics published by the Australian Institute of Health and Welfare, which they say showed that prevalence of daily smoking fell between 2010 and 2013. They pointed out that the survey was conducted before the tax rises that occurred in December 2013, and suggested that standardised packaging was the only major tobacco control policy introduced during that period.
- 4.11. There were some more specific comments about young people in Australia which referred to that same survey showing that fewer young people were taking up smoking. In addition, they pointed to Australian Government statistics which they said indicated that there had been a decrease in the first quarter of 2014 in tobacco sales per person, with consumption of tobacco at the lowest level that it had ever been.
- 4.12. Some respondents also attributed the introduction of standardised packaging to the increased number of calls to Quitline in New South Wales, and a study which showed that the number of cigarette packets displayed in public and outdoor areas had significantly reduced, in part because of a fall in the number of consumers and in part due to smokers being less willing to display their packs in public.
- 4.13. Others, however, felt evidence from Australia was unfavourable or showed no increased impact on decline of tobacco consumption levels. British American Tobacco provided a report which gave analysis of data which they said shows increases in smoking prevalence, indicators that standardised packaging had made it harder to quit smoking, and other findings following the introduction of standardised packaging.
- 4.14. Other respondents said that the data recently published by the Australian Government confirms that smoking prevalence has not fallen in line with the pre-existing trend since the introduction of the policy, and that consumption levels had not decreased, with some claiming that it had increased. Some responses said that

national rates for youth smoking had actually increased between 2010 and 2013. They also pointed to industry sales data that demonstrates that there had been increased sales of factory made cigarettes and some claimed that the low price cigarette segment had grown.

- 4.15. Some respondents questioned the validity of the current evidence base in Australia. Some felt there is a need for more robust evidence, as some of the studies cited are still limited in their scope. Criticisms of existing data and research in Australia were that confounding variables made it nearly impossible to make claims of cause and effect, with many stating that it is difficult to decipher the actual impact standardised packaging has had on smoking uptake or quitting when the policy was implemented alongside other policies and is still in its infancy.
- 4.16. Some respondents noted that the Australian Government review of the impact of the policy would occur in December 2014 and felt that there should be a full evaluation of both Australian data and the impact of the display ban (from 2015) before regulations are brought into force in the United Kingdom.
- 4.17. Some respondents who supported standardised packaging expressed concern over what they perceived to be tobacco industry's attempts to refute the success of standardised packaging. They claimed that industry reports of an increase in sales of tobacco since the introduction of standardised packaging had not considered this in relation to increases in the Australian population. They suggest that when adjusting for this, tobacco sales per person have fallen. Some also pointed towards pre-stocking of tobacco prior to a tax increase in December 2013 as a potential explanation for any apparent increase in sales.

## Question 2

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

- 4.18. Respondents used this question to discuss all of the wider aspects of the proposed policy, including possible unintended consequences, legal considerations and comments on the policy process.

### Unintended Consequences

- 4.19. Some respondents who were against the introduction of standardised packaging, said that the removal of trade marks may encourage price competition or commoditisation, which could potentially lead to an increase in consumption, particularly in young people. Some believed that a possible increase in down trading from more expensive brands of tobacco to cheaper brands (as a result of the loss of branding) would lead to a loss in revenue for retailers and the Exchequer. Some respondents claimed that this had occurred in Australia, with the market share for cheaper cigarettes rising since the introduction of standardised packaging.
- 4.20. Some respondents from the tobacco industry indicated that standardised packaging may inhibit the tobacco industry from being able to fairly compete and differentiate their products, which they argue would also create barriers to entry to the tobacco market for new businesses, products and innovation.
- 4.21. One of the main themes to emerge related to illicit trade. Respondents provided views on the impact of plain packaging on the illicit market in Australia and also in relation to the potential impact in the UK.
- 4.22. Some respondents, including tobacco manufacturers and retailers, were concerned that standardised packaging could increase the supply of, or demand for, illicit tobacco. They argued that the illicit market in Australia had increased significantly since the introduction of standardised packaging, pointing to evidence such as the KPMG full year report, which suggested that illicit trade in Australia has increased as a percentage of total consumption. Others referred to a newspaper article claiming that a major cigarette counterfeiter saw standardised packaging as a potential boost for illicit trade, and a survey which indicated that police officers were concerned that standardised packaging may accelerate the black market. Some respondents said that standardised packs would be less complicated to counterfeit. Some also referred to an increase in confiscation of illicit cigarettes by Customs and Border Protection Services in Australia between 2012 and 2013, in comparison to between 2010 and 2011.
- 4.23. The fears around any potential increase in illicit trade centred on the possible harm to human health (as a result of unregulated ingredients), a loss of customers for legitimate retailers and a decrease in the quality of the products. Some respondents

also mentioned the potential loss of tax revenue that may accompany any rise in illicit trade.

- 4.24. The concerns around illicit trade were countered by some respondents, who felt they were unfounded, and had been addressed in the Chantler Review which concluded that there was a lack of evidence to support such concerns. Some responses also stated that the Australian Government and their customs officials had disputed the claims, suggesting that industry-funded research had over-estimated the level of illicit trade in Australia. Some respondents cited views from a HMRC official giving evidence at a Home Affairs Select Committee saying that standardised packaging was unlikely to have a material effect on counterfeiting and illicit trade was also referred to.
- 4.25. Some respondents said that illicit tobacco would be easier to identify if packs were standardised, and pointed to the fact that key security features on existing packs would be upheld on standardised packaging and new systems such as “codentify”, as developed by Philip Morris International, would help to combat illicit trade. They stated that these measures would be further strengthened by additional markings required under the EU Tobacco Products Directive, including unique identifiers, coded numbering and covert anti-counterfeit marks. It was argued therefore that there was a lack of plausible mechanism by which standardised packaging would cause a direct increase in illicit tobacco.
- 4.26. Many respondents mentioned that more enforcement was still needed as the illicit market in tobacco products remains too large.

### Legal Considerations

- 4.27. Some respondents to the consultation raised potential legal issues in relation to the policy. These were varied, with some respondents from the tobacco industry stating that they believe the proposal to be illegal. Some respondents indicated that they would be prepared to take legal action against the regulations in court if required. Some also referred to responses to the 2012 consultation on legal issues and argued that the draft regulations did not take these fully into account.

### The overarching themes are listed below;

- 4.28. *FCTC*: Some stated that the World Health Organisation’s (WHO) Framework Convention on Tobacco Control (FCTC) does not mandate standardised packaging.
- 4.29. *EU Tobacco Products Directive (TPD)*: Some respondents believe that the Government should wait until after the revised EU Tobacco Products Directive disputes have been resolved before proceeding with the policy. Responses pointed in particular to Article 24(2) of the TPD, which is relevant to standardised packaging, and to the principle of free movement of goods between member states, which would be affected by standardised packaging. Some respondents felt that the policy could constitute a “clear barrier to trade”.
- 4.30. *Intellectual Property and Trade Marks*: One of the main legal issues raised related to intellectual property and trade marks. Some respondents believed that the policy would constitute a deprivation of their property rights and a huge loss to brand owners. Some respondents believed that standardised packaging would contravene various international and UK laws which provides for the protection of intellectual property. These include; the WTO Agreement on Trade-related Aspects of



Intellectual Property (TRIPS), Article 17 of the Charter of Fundamental Rights of the European Union, the WTO's Agreement on Technical Barriers to Trade (TBT), the Human Rights Act 1988 and Section 22 of the UK Trade Mark Act 1994 and Bilateral Trade Agreements. Some respondents described the high value of trade marks and brands to the tobacco industry and claimed that large amounts of compensation to companies could be awarded if such laws were found to have been broken.

- 4.31. *Australian litigation*: Some respondents mentioned current legal challenges to Australia's Tobacco Plain Packaging Act, claiming that it infringes various international treaty obligations. Such responses suggested waiting until the outcome of the World Trade Organisation (WTO) dispute resolution proceedings.
- 4.32. Many supporters of standardised packaging believed that the challenges mounted against Australia were from countries supported by the tobacco industry, as the WTO rules do not permit private businesses and organisations to challenge. They encouraged the UK Government to take confidence from the situation in Australia and pointed to several other countries which are at various stages of consideration of the policy, including Ireland, New Zealand and France.
- 4.33. Some respondents stated that although the tobacco industry have argued that standardised packaging would be an infringement of their intellectual property, this argument has been tested in and dismissed by the Australian High Court. They also argued that standardised packaging constitutes a restriction of the use of a trademark rather than its appropriation and that international trade agreements state that they should not be interpreted in a way which prevents implementation of public health measures. They also pointed out that the draft regulations still allow for trademark registration and also use in the wholesale trade.
- 4.34. Some respondents held the view that an introduction of standardised packaging for tobacco products could set a legal precedent for other sectors, such as food and beverages.

### Public Support

- 4.35. Some respondents stated that there was wide public support for the introduction of standardised packaging, quoting from a number of surveys, polls and research. This included a poll by YouGov for ASH (Action on Smoking and Health) which found that 64% of adults in Great Britain were in favour of standardised packaging, with only 10% opposed to it. Others quoted similar surveys from their region and some referred to the fact that Section 94 of the Children and Families Act 2014 was passed overwhelmingly in Parliament. Some, however, felt that public support was generally against the measures, with some responses referring to the 2012 consultation campaign responses and stating that almost two thirds of the respondents to that consultation were opposed to standardised packaging.

### Policy Process

- 4.36. Some respondents commented on the policy process. These included comments on the perceived proportionality of the proposed policy. Local authorities, public health and trading standards departments outlined the need for urgent action to reduce the prevalence and uptake of smoking. Respondents referred to mortality rates from tobacco-related illnesses, the negative health effects and the cost to society of smoking. Many local authorities emphasised the scale of smoking uptake by young

people as well as wider tobacco related health problems in their area. Such respondents sometimes stressed the need for legislation to be passed soon.

- 4.37. Some respondents who did not support standardised packaging referred to existing restrictions on the sale and packaging of tobacco products in the UK, suggesting that any further restriction would be unwarranted. Some respondents specifically referenced the legislation ending the display of tobacco products in shops, which will be fully implemented in April 2015, and the EU Tobacco Products Directive's requirements for packaging. Some respondents suggested that these other measures should be fully implemented and evaluated before progressing with a policy of standardised packaging, and that the process was therefore against the Government's better regulation principles. Some respondents felt that a policy of standardised packaging would be "gold plating" of EU measures. Some also believed that the policy "goalposts" had been moved, with the aims of the policy being widened since 2012.
- 4.38. Some respondents believed that standardised packaging would be a disproportionate measure because there is a long term decline in the numbers of young people smoking, young people represent a small proportion of smokers and that they feel education is a better approach to target this problem. They also felt that consumers were already adequately informed about health risks and that there is an absence of evidence on packaging as a factor in smoking initiation.
- 4.39. There were also some complaints about the policy process from opponents of the policy. They referenced the six week consultation period as too short, and the timing over summer as being problematic for responding comprehensively. Some felt that the policy process on the whole was happening too quickly to consider all impacts of the policy, and referenced that requests to extend the consultation period had been rejected. Some respondents felt that the Government had already decided to go ahead with standardised packaging before running the consultation.
- 4.40. Other respondents felt that the consultation document outlined the issues well, and welcomed the clarity given by the draft regulations as to the details of the policy, how it would work in practice and how it would be enforced. Some approved of the six week consultation timeframe, referencing the fact that this policy has been consulted on before.

### Alternative Measures

- 4.41. Respondents in support of the policy called for it to be a part of a wider comprehensive strategy of tobacco control, which they argued would be the most effective approach. Suggested additional policies included increased media presence, more funding for stop smoking services, tax increases and a ban on sponsoring of sporting events by tobacco companies.
- 4.42. Some respondents who do not support standardised packaging suggested that other measures would be more effective, including improved education, targeted campaigns and a focus of activity towards responsible parenting. Some also recommended that access to tobacco for under 18 year olds should be further restricted to stop proxy purchasing by adults.

### Question 3

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

#### No comment

- 4.43. Some respondents from the tobacco industry did not provide a detailed response to this question as they believe the proposed regulations to be unlawful. Other respondents from the tobacco industry reserved their rights in relation to the regulations and said nothing further.

#### Comments

- 4.44. Those respondents who addressed this question either provided comments on specific parts of the draft regulations or suggested recommendations for implementation, should the proposals come into force. Some also suggested possible alternative policies that they believed would address the objectives instead of standardised packaging.
- 4.45. Some respondents in support of standardised packaging welcomed the inclusion of health warnings on tobacco packets. Some were content that the draft regulations would require dark colours rather than light as they considered that this addressed public misconceptions about differing levels of risk and harm caused by tobacco products.
- 4.46. Some respondents from the tobacco industry felt that the distinction in the regulations between cigarettes and hand rolling tobacco and other tobacco products was unjustified. Specialist tobacco manufacturers, importers and retailers, however, welcomed the proposed exemption of specialist tobacco products, but outlined their arguments to ensure that in future these products were not included. These arguments included that consumption of specialist tobacco products is relatively low, especially amongst young people, that consumption levels are declining and that the wider range of brands and product types could mean that the policy would be complex to implement. They also pointed to what they saw as an anomaly in the revised EU Tobacco Products Directive regulations, which had been incorporated in to the draft regulations, whereby specialist tobacco products are permitted to have additional smell, tastes and flavours, but these cannot be referred to or described on the packaging. Whilst recognising that this is consistent with the Tobacco Products Directive legislation, they asked for specific allowances to do so.
- 4.47. Some health professionals and local authorities felt that there was a need to include all tobacco products and some extended this to include cigarette filters and paper. Some respondents were concerned that differentiating between tobacco products would create the misconception that some were more harmful than others. Others felt that e-cigarettes should be considered under these regulations, with concerns

that consumers may choose to move to these “more attractively packaged” alternatives if the regulations came into force.

### Regulation amendment suggestions

4.48. Some respondents called for specific amendments to the draft regulations. These included:

- More specific regulations regarding the length and size of cigarettes. There was some concern that tobacco manufacturers could re-brand cigarillos to avoid standardised packaging requirements.
- The removal of bevelled or rounded edges on packs.
- Minimum pack sizes to allow for adequate sizing of health warning messages.
- Minimum pack sizes in terms of quantity of cigarettes in each pack. Some respondents suggested a set amount of 20 cigarettes and 30g of hand-rolling tobacco. It was felt by some that this would prevent tobacco companies from being able to offer “free” cigarette incentives.
- Limits to the types of opening mechanisms permitted on packs, only allowing for “flip top” lids and not permitting “shoulder hinged” lids.
- Limiting the wording on cigarette sticks to identification codes only.
- Addition of braille warnings and product names for the visually impaired.
- Age restrictions to be added onto packets to make it clear that the products are not for sale to those under the age of 18.
- Quitlines to be mandated on packs.
- The removal of some specific brand names such as “slim”, “gold” or “silver” as these could mislead consumers into thinking that these products were less harmful than other brands.
- Ensuring that no additive can be added to products to create noise or scent.
- Some respondents observed that the tobacco display regulations allow for a pictorial list of tobacco products to be provided at the point of sale by retailers and that standardised packaging would make such lists obsolete
- Price marked packs to be allowed to aid retailers.
- More clarity with regards to the application of the regulations in wholesale trade and other areas of the supply chain.
- A clearer definition of “warehouse”.
- A more relaxed approach to text size and font on packaging, to enable retailers to more quickly identify packs. Some export shops also felt that the requirement to use the Roman alphabet would hinder product selection by a

growing number of customers from countries where a different alphabet is used (for example China or Russia).

- Anti-smuggling devices to be built into the standardised packs, with some recommending the implementation of standardised packaging after the introduction of a track and trace system as required by the Tobacco Products Directive. Some also referenced “codentify”, a system developed by Philip Morris International to ensure pack security.

### Implementation and Timetable

4.49. Retailers emphasised the need for current stock to be sold before standardised packaging came into force. Most respondents addressing proposed sell through periods were broadly content with proposals in the consultation, but retailers still outlined that one year was required as a minimum. Some felt that longer was needed, particularly in wholesalers and warehouses with large quantities of stock. The timing of any introduction of standardised packaging was asked to take account of the implementation of other policies such as the display regulations and the Tobacco Products Directive.

### Enforcement

4.50. Several local authorities advocated the need to ensure that trading standards officers were equipped and trained in order to implement the measures. Trading standards responses also raised the need for resources. These responses were often quick to re-iterate that illicit trade was not a new problem, and as such they felt capable to deal with the issue in the future. One potential new challenge was the difficulty in monitoring and enforcing distance retail sales. Trading standards respondents also suggested a stricter penalty for those who contravene the regulations.

## Question 4

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

- 4.51. Responses to this question were detailed and commented on the methods and assumptions used in the impact assessment alongside some more general comments about the policy and possible unintended consequences.
- 4.52. Some respondents who were not in support of standardised packaging criticised the impact assessment, stating that it did not substantiate that standardised packaging is necessary, appropriate or proportionate. Such respondents believed that the process followed was biased towards the implementation of standardised packaging and that the impact assessment does not comply with regulatory guidelines. They also argued that the impact assessment was oversimplified and generalised.

### Benefits

- 4.53. Some respondents welcomed that the impact assessment drew out the financial burden of tobacco use and the potential economic benefits that could be gained with the introduction of standardised packaging. Some referenced Australian data and some local authorities also gave examples of the ways in which smoking impacts negatively on their local economies.
- 4.54. Other respondents, however, were of the view that the impact assessment overestimated the benefits and gave insufficient assessment of the policy against its stated objectives. Some respondents from the tobacco industry criticised the methodology for calculating the potential reduction in smoking prevalence, stating that this was based on a single exercise which in their view was subjective and biased. Such respondents argued that the impact assessment failed to take into account a number of key factors, including existing trends in smoking prevalence, the e-cigarette market and the impact of other regulatory measures.

### Costs

- 4.55. Some respondents from within the tobacco supply chain believed that the impact assessment did not have sufficient grasp of commercial reality, with a lack of real-world assessment of costs such as the impact on; branding, jobs, consumer surplus, the exclusion of non-UK shareholders, competition, packaging and design. Some argued that the costs had been underestimated, particularly with regards to the impact on tobacco manufacturers, retailers and those involved in packaging and design. A further criticism was that significant impacts were not quantified, instead relying on “best guesses”.
- 4.56. Some argued that the impact assessment did not fully take into account the possibility of unintended consequences such as impact on illicit trade or increased prevalence of smoking due to down trading and price competition. A specific criticism was that the impact assessment did not fully consider the costs to the hand rolling

tobacco market. Other respondents agreed with the suggested mitigating measure of increased taxation to reduce the impact of down trading and a strengthening of the enforcement regime to tackle any risk of growth in the illicit market.

- 4.57. There was some discussion in responses on the issue of consumer surplus. Some respondents felt that standardised packaging would remove a key means by which consumers were able to exercise freely their economic rights of purchase, reducing consumer capacity to differentiate between products. Others, however, felt that the choice available would not be restricted, with some suggesting that the impact assessment over-states the loss in consumer surplus as the addictive nature of cigarettes is not explicitly addressed.
- 4.58. Some responses focused on the issue of employment, suggesting that there could be a negative impact on UK employment. This issue was reflected in the postcard campaign from Unite the Union. This fear spanned a range of sectors along the supply chain from tobacco manufacturers to small retailers. Other respondents believed that the policy could have a number of other potential impacts on the economy of the UK, including making the UK a less attractive place for foreign investment.
- 4.59. Some respondents expressed fears over an increase in cross-border purchasing, believing that consumers could switch to buying tobacco products from neighbouring countries which still permitted branded packs. Others, however, noted that when the UK introduced coloured picture warnings on packaging ahead of other European countries, this did not cause an increase in cross border shopping, arguing that standardised packaging was also unlikely to cause this effect.
- 4.60. Further criticisms included that the impact assessment used an incorrect assumption that capital can be re-allocated elsewhere to eliminate lost profits, did not provide complete analysis of the losses in consumer welfare and did not properly assess the potential impact on the taxpayer. Specifically, some respondents criticised the impact assessment for not including “multiplier effects” of losses to the Exchequer, or negative effects on the legitimate tobacco supply chain.
- 4.61. Some respondents believed that the impact assessment underestimated the value of intellectual property and brands, and consequently the costs did not accurately reflect the compensation liability that the Government could incur if successfully challenged in the courts. Some respondents estimated this amount to be in the billions.

### Impact on retailers

- 4.62. Opponents felt that there would be a number of potential specific negative impacts on retailers that should be further considered in the impact assessment.
- 4.63. One issue raised was that of transaction times. Many retailers who responded felt that standardised packaging would make it more difficult to distinguish between brands requested by customers during a sale and therefore increase transaction times. It was believed that this could lead to dissatisfied customers, increased staff costs and putting retailers at personal risk of attack or theft whilst their backs are turned away from the shop floor. Some respondents suggested stocking cigarettes in alphabetical order as a solution to this potential problem, though some retailers pointed out that usually stock is organised by popularity. A number of studies on transaction times were referenced, which had conflicting results. Those who were

opposed to the policy quoted studies which showed an increase in transaction times, and those who supported the policy quoted studies which showed an overall decrease in transaction times following implementation of the policy in Australia.

- 4.64. Retailers also discussed the potential impact on their profit margins. It was felt by some that standardised packaging would lead to consumers down trading from premium products to less expensive products, on which the profit margins are lower. Respondents believed that this could have a serious negative impact on their business and could result in the risking of jobs and the viability of their business as a whole. This was related to the issue of footfall, with retailers believing that decreased footfall from reduced tobacco sales could put their business at risk as tobacco shoppers spend more per visit than non-tobacco shoppers, by buying other goods in store. The issue of reduced footfall was also raised by wholesalers. Other respondents highlighted that profit margins are small on tobacco products compared to other types of product and acknowledged that tobacco sales are undergoing long term decline, suggesting that retailers are already having to adjust to this.
- 4.65. Some retailers also noted that the impact assessment was only published in English. This was felt to isolate a large group of independent retailers.

### Export Shops

- 4.66. Export shops argued that the impact on them would be disproportionate and that they should therefore be exempted from the regulations. Respondents from this sector believed that a unique solution had been reached for them in the tobacco display legislation which took account of the nature of this retail channel, its competitive field (with airlines or neighbouring countries who would not have to introduce the policy) and its contribution to airport revenue. They also pointed out that they account for only a small proportion of total UK tobacco sales (around 1%) and that the nature of the sale is unique. They noted that duty-free tobacco is only sold to customers leaving the EU and that a significant proportion of customers are foreign nationals, with some not being English speaking which they felt would make it very difficult for them to distinguish between products in standardised packaging.

### Packaging and design companies

- 4.67. Packaging and design companies felt that the impact assessment did not include sufficient detail in relation to the loss of business to packaging producers. They believe that it is inconsistent that this is recorded as a negative impact but also recorded as a cost saving to business. It was suggested that further consideration of the technicalities of packaging manufacturing and the complexity of packs was required.

### General

- 4.68. Some respondents believed that the baseline scenario was flawed, and that the legality of the Tobacco Products Directive should not be assumed.
- 4.69. A number of respondents pointed out that the impact assessment had received an “amber” rating by the Regulatory Policy Committee (RPC).



## Recommendations

4.70. Respondents on both sides of the debate made a range of recommendations for the impact assessment. These included;

- Option 1 to be fully costed
- The development and costing of alternative options
- Consultation with other Government Departments about the policy
- The use of econometric techniques to distinguish among the multiple factors on a single outcome such as smoking prevalence
- Further assessment of the impact on illicit trade and other potential negative impacts
- More consideration to be given to data emerging from Australia

## 5. Campaigns

5.1. This section provides a summary of the campaign responses received. There were 8 campaigns run in response to this consultation, all of which were opposed to the policy.

British American Tobacco Pension Company:

<b>Campaign Name</b>	<b>No campaign name</b>	<b>Key Points from Campaign</b>
Organising Group	British American Tobacco Pension Company	Re: UK Department of Health Consultation on Standardised Packaging of Tobacco Products As a pensioner of British American Tobacco, I am writing to express my opposition to plain packaging of tobacco.
Format Type(s)	Standard Letter & Standard Email	
Number of Responses	824	<p>There is no credible evidence that children start smoking because of the packaging, or that 'plain' packaging will deter children from smoking. To the contrary, evidence suggests that people start smoking because their parents and peers smoke; therefore the most effective measures to reduce youth smoking are education, public engagement, and enforcement of laws related to the black market and age verification. There is a great deal of speculation about the effect of plain packaging, as outlined in the recent Chantler Report, which noted that it was only 'plausible' that plain packs might have an effect. Speculation and conjecture are no substitute for hard facts.</p> <p>The facts from Australia are clear; shipments of tobacco products have increased; the black market has increased; and the decline in smoking rates has slowed.</p> <p>I urge you to delay consideration of any regulations on this issue: the upcoming tobacco display ban, which will not be fully implemented until 2015, has not yet been fully reviewed. In addition, a new set of tobacco controls was recently passed in Europe which has not begun to be implemented.</p>

FOREST:

Campaign Name	Hands off our packs	Key Points
Organising Group	FOREST	I am writing to express my opposition to plain packaging of tobacco.
Format Type(s)	Standard email, standard letter, & signed petition	A four-month government consultation in 2012 resulted in over 665,000 responses, with a substantial majority (427,888) opposed to the policy. I urge you to respect the outcome of that consultation which members of the public responded in good faith.
Number of Responses	123,269	There is no credible evidence that children start smoking because of the packaging, or that 'plain' packaging will deter children from smoking. Speculation and conjecture are no substitute for hard facts. Before pressing ahead with legislation I urge you to wait until the government has studied the impact of the of the tobacco display ban, which will not be fully implemented until 2015, and the introduction of the larger health warnings which are being introduced in 2016 as part of the EU's revised Tobacco Products Directive.

Imperial Tobacco:

<b>Campaign Name</b>	<b>Imperial Tobacco letter to pensioners</b>	<b>Key Points</b>
Organising Group	Imperial Tobacco	<p>Standardised packaging has severe unintended consequences and there is no credible, or new, evidence that it will achieve the Department of Health’s objectives. In Australia, the only country to have implemented standardised packaging, the facts are clear – smoking prevalence has not decreased whilst illicit trade has increased by 20% since its introduction, now accounting for 13.9% of total consumption (KPMG, 2014).</p> <p>During the 2012 public consultation over 425,000 respondents stated that they were against standardised packaging. This accounted for around two-thirds of all responses. If the proposals are introduced it would affect consumers, wholesalers, retailers, and of course, our business and livelihoods.</p> <p>Standardised packaging has to be stopped; with only three weeks remaining before the Government consultation closes it is vitally important that we make a rational and fact based stand. If you share our concerns, please show your support by signing the ‘No Prime Minister’ petition: <a href="http://www.noprime minister.org.uk">www.noprime minister.org.uk</a></p>
Format Type(s)	Invitation to participate in campaign letter signed by participants	
Number of Responses	7	

UNITE:

Campaign Name	Standardised Packaging Tobacco Products = UK Jobs At Risk	Key Points
Organising Group	UNITE	<p>I support Unit the Union in their response to the UK Government Consultation on standardised packaging of tobacco products.</p> <p>I do not believe the UK Government should move forward with standardised packaging proposal because:</p> <ol style="list-style-type: none"> <li>1. A ban on the use of branding, logos or colours on packs would lead to an increase in the illicit trade in tobacco which in turn could become both more attractive and accessible to young people.</li> <li>2. The evidence from Australia (KPMG Report) shows that the illicit tobacco trade has increased since the policy was introduced there in 2012. Even the UK Government’s own Impact Assessment on plain packaging suggests there would be an increase of non-UK duty paid cigarettes as a result.</li> <li>3. The proposals are therefore a threat to thousands of well-paid and highly skilled UK jobs and to investment in the packaging and tobacco sectors.</li> </ol> <p>I wish to register my strong opposition to the draft regulations and would request that the information and views supplied on this form be sent to the Department of Health on my behalf.</p>
Format Type(s)	Campaign Postcard	
Number of Responses	2,290	

Tobacco Retailers Alliance:

Campaign Name	No to Plain Packs	Key Points
Organising Group	Tobacco Retailers Alliance	Response to the Standardised Tobacco Packaging Consultation – 2014
Format Type(s)	Campaign Postcard	<i>I am a retailer who sells tobacco. I am opposed to standardised/plain packaging as it would:</i>
Number of Responses	10,001	<ul style="list-style-type: none"> <li>• Fuel the black market in counterfeit and smuggled tobacco. This has been the effect in Australia. Already, up to 16% of cigarettes consumed in the UK are not bought in UK retail, and this will get worse.</li> <li>• Frustrate my customers as I need to spend more time serving them.</li> <li>• Add more restrictions. The tobacco display ban is not even implemented yet. Europe has just decided to ban packs of fewer than 20 cigarettes, packs of less than 30g of tobacco and menthol cigarettes.</li> </ul>

Local Campaigns:

Campaign Name	No name given	Key Points
Organising Group	Local Campaign 1 – no clear organising group	UK Department of Health Consultation on Plain Packaging I am a non-smoker but am writing to state my opinion on standardised packaging proposals in the UK and the likely effects upon smoking habits, particularly upon children.
Format Type(s)	Standard Letter	
Number of Responses	4	Plain packaging will have no more effect upon adult smokers than any amount of graphic deterrents already on packets. The adult committed smoker will continue to smoke whatever the cigarette is presented in until he or she has a positive desire to stop smoking. The bigger issue is whether the current proposals will contribute towards a reduction in young children taking up smoking. My view is that it will do precisely the opposite. Young children are influenced by their elders' and their parents' behaviour and giving the product an 'invisibility' will only increase the temptation. Furthermore, plain packaging will, as has been demonstrated in Australia, increase the black market in tobacco products dramatically, resulting in a ready supply of cheap (and probably more dangerous) products on the streets where there be no control or restriction of sale to young persons. The way to go about discouraging the young from taking up smoking is education, education and more education. I urge you to give very careful consideration to this issue as in my view it spells disaster for the campaign to discourage the young from taking up the habit.

Campaign Name	No Name	Key Points
Organising Group	Local Campaign 2 – no clear organising group	I am writing this letter as a formal response to the Department of Health consultation on the ‘standardised packaging of tobacco products’ which was launched on 16th April 2012. I would like to express my views in writing and detail my objections to any such regulation.
Format Type(s)	Standard Letter	I wish to draw your attention to the following points in support of my position:
Number of Responses	4	<ul style="list-style-type: none"> <li>• There was no evidence at the time of the 2012 public consultation and there is still no evidence now that Plain Packaging will actually have any positive public health impacts.</li> <li>• This is also the third public consultation in the past six years on this subject. None have progressed due to lack of evidence that the proposal would have the desired impact. There is still no evidence so why would you wish to progress this regulation now?</li> <li>• The UK is consulting on Plain Packaging despite the fact that the Display Ban has not yet been fully completed and the results of this legislation yet to be realised.</li> <li>• The UK is already heavily disadvantaged due to high levels of taxation compared to other EU member countries. Circa 50% of RYO is estimated to be non UK duty paid and 16% of the ready-made cigarette market. Plain Packaging would potentially increase the size of this problem denying the UK millions in lost tax. At a time when the country is facing such austerity measures this seems illogical?</li> <li>• This is being realised in Australia already where there has been an increase in illicit trade from 11.8% to 13.9% according to a recent KPMG report.</li> <li>• The European Products Directive comes into effect in May 2016 increasing the size and cost of an adult smokers tobacco purchase. This will bring to the fore these uncompetitive retail prices versus other member states. Why cement the problem further as discussed with Plain Packaging?</li> <li>• The amount of counterfeit stock will rise even further with further financial reductions to the Treasury.</li> <li>• The main beneficiaries from this regulation are other member states and criminals who will take advantage of the opportunity presented through Plain Packaging.</li> <li>• Ultimately would it not make sense for the Government to understand the impact of TPD and Display Ban before pushing ahead with more regulation especially regulation with no evidence to support its introduction.</li> <li>• Even taking into account health concerns, would it not</li> </ul>



		<p>make sense to be fully in control of the tobacco market in the UK through regulation of 100%UK duty paid volume. Any regulation introduced leads purely to an increase in illicit trade and the removal of Government influence from both a health and commercial perspective. I would like you to review these points before proceeding with any formal legislation.</p>
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Campaign Name	No Name	Key Points
Organising Group	Local Campaign 3 – no clear organising group	<p>I am totally against your proposal to put tobacco into plain packs. Perhaps if you worked 12 hours a day, 7 days a week to earn a living in the toughest retail environment I can remember you realise what an ill conceived idea this is.</p> <p>Both my staff and I work hard to ensure we meet all the relevant laws on age restrictions whether it be alcohol, lottery or tobacco. At every turn all you want to do is add more regulation at a time when we are crying out for less!</p> <p>This will undoubtedly play into the hands of the illegal sellers who in my area get away with it on a daily basis without any concern of being caught.</p> <p>I have seen no evidence from any sector that this will work! In fact quite the opposite it will increase under age smoking because no one will be able to see the difference in the illegal packs.</p> <p>This is an ill thought out plan from the zealots in the health dept and a gutless political elite who think the electorate will be impressed with them! While what they are actually doing is alienating 10 million smokers while making a few in the health depot happy because the vast majority of the electorate couldn't give a damn!  <b>STOP THIS STUPID IDEA NOW</b></p>
Format Type(s)	Standard Letter	
Number of Responses	5	

## Appendix A

### List of Organisations and Businesses that responded to the consultation

#### Businesses

<b>Business or Sole Trader Name</b>	<b>Job Title of Respondent</b>	<b>Type of Business or Sole Trader</b>	<b>Other type of business or sole trader</b>
1st Stop 2 shop (Dundee)		Tobacco retailer (convenience store)	
A G Parfett & Sons Ltd		Wholesale tobacco seller	
A S Supermarket (Walsall)		Tobacco retailer (convenience store)	
A3 Food & Wine (Surbiton)		Tobacco retailer (convenience store)	
Aelia UK Limited	Managing Director	Duty-free shop	
Agemos - Italian Association of Tobacco Distributors	n/a	Other type of business representative organisation	
AIPPI - The Lithuanian Group of the International Association for the Protection of Intellectual Property	President of AIPPI Lithuanian Group	Other type of business representative organisation	
AJ's Convenience Store (Nottingham)		Tobacco retailer (convenience store)	
Albert Square Stores (None Given)		Tobacco retailer (convenience store)	
Ali and Son (Motherwell)		Tobacco retailer (convenience store)	
Amcor		Business involved in the design or manufacture of packaging	
Ameen News Ltd (Heywood)		Tobacco retailer (convenience store)	

Amir and Son (Edinburgh)		Tobacco retailer (convenience store)	
AMMA Service Station	Service Station Owner	Tobacco retailer (other type of shop or business)	
Andover Road Post Office (Nottingham)		Tobacco retailer (convenience store)	
Angel Food & Wine (Ipswich)		Tobacco retailer (convenience store)	
Arcade News (Bedford)		Tobacco retailer (convenience store)	
Arkays Ltd (Thornton Heath)		Tobacco retailer (convenience store)	
Arken POP International		Business involved in the design or manufacture of packaging	
AS Food & Wine (Telford)		Tobacco retailer (convenience store)	
ASD Off-License		Tobacco retailer (convenience store)	
ASHS Convenience Store (Manchester)		Tobacco retailer (convenience store)	
Asian Trader Magazine		Other	
AUR Newsagent (Birmingham)		Tobacco retailer (convenience store)	
Ayngaran Service Station	Service Station Owner	Tobacco retailer (other type of shop or business)	
Bank Convenience Store (Redditch)		Tobacco retailer (convenience store)	
Barford Village Shop - Church Street - Barford - Warwickshire - CV35 8EN	Shop Manager	Tobacco retailer (convenience store)	

Bargain Booze (Kendal)		Tobacco retailer (convenience store)	
Bargain Booze (Leeds)		Tobacco retailer (convenience store)	
Bargain Booze (Netherfield)		Tobacco retailer (convenience store)	
Bargain Booze Plus (Cheshire)		Tobacco retailer (convenience store)	
Barnes Express	Retail Newsagents	Tobacco retailer (convenience store)	
Baron's Newsagents (Merseyside)		Tobacco retailer (convenience store)	
Barrow Stores - Costcutter (Bury St Edmunds)		Tobacco retailer (convenience store)	
Beacon News (West Midlands)		Tobacco retailer (convenience store)	
Beasleys CTN (London)		Tobacco retailer (convenience store)	
Beghal Food Stores (Birmingham)		Tobacco retailer (convenience store)	
Belle Vue Convenience (Middlesborough)		Tobacco retailer (convenience store)	
Bellshill Post Office (Bellshill)		Tobacco retailer (convenience store)	
Bench Road Store (Buxton)		Tobacco retailer (convenience store)	
Benkert UK Ltd	Director	Business involved in the design or manufacture of packaging	Tipping paper manufacturer
Bentley Food and Wines (Walsall)		Tobacco retailer (convenience store)	

Bentley News (Walsall)		Tobacco retailer (convenience store)	
Best One (Bensham)		Tobacco retailer (convenience store)	
Best One (Leicester)		Tobacco retailer (convenience store)	
Best One (Stradishall)		Tobacco retailer (convenience store)	
Best One / Genesis (Hammersmith)		Tobacco retailer (convenience store)	
Bestway Cash & Carry	Group Trading Director	Wholesale tobacco seller	
Bhutta's Newsagents (Ibroy)		Tobacco retailer (convenience store)	
Bills Supermarket Ltd (Nuneaton)		Tobacco retailer (convenience store)	
Birdwell News (South Yorkshire)		Tobacco retailer (convenience store)	
Birmingham Airport	Chief Executive Officer	Duty-free shop	
Birmington Common Stores (Chesterfield)		Tobacco retailer (convenience store)	
Blackfen Off License (Sidcup)		Tobacco retailer (convenience store)	
Boosdeck (Saltburn-by-the-sea)		Tobacco retailer (convenience store)	
Booths Convenience Store (Swanwick)		Tobacco retailer (convenience store)	
Booze and Booze (Oldbury)		Tobacco retailer (convenience store)	
Booze Barn (Nottingham)		Tobacco retailer (convenience store)	
Bottle and Can (None Given)		Tobacco retailer (convenience store)	

Bownass Newsagent (Morely)		Tobacco retailer (convenience store)	
BP Bush 422		Tobacco retailer (convenience store)	
BP Heckmondike Service Station		Tobacco retailer (convenience store)	
BP Ward End (Birmingham)		Tobacco retailer (convenience store)	
Brackenboro Post Office (Brackenboro)		Tobacco retailer (convenience store)	
Bristol Airport	Commercial Director	Other	Airport operating a Duty Free shop
Britannia Wines		Tobacco retailer (convenience store)	
British American Tobacco (BAT)		Tobacco manufacturer	
British American Tobacco (Romania) Investment SRL		Tobacco manufacturer	
British American Tobacco Indonesia		Tobacco manufacturer	
Broadlea Mini Market (Leeds)		Tobacco retailer (convenience store)	
Broadwater Store (Fleetwood)		Tobacco retailer (convenience store)	
Broseley News (Brosley)		Tobacco retailer (convenience store)	
Brothers Convenience (Fareham)		Tobacco retailer (convenience store)	
Brownmoor Express (Crosby)		Tobacco retailer (convenience store)	
Brucciani (Carlisle) Ltd (Carlisle)		Tobacco retailer (convenience store)	
C.J. News (Olton)		Tobacco retailer (convenience store)	

Cannon News (Pinner)		Tobacco retailer (convenience store)	
Canon Pyon PO & Stores	n/a	Tobacco retailer (convenience store)	
Cantleys Spar (County Antrim)		Tobacco retailer (convenience store)	
Cardewlees Service Station (Carlisle)		Tobacco retailer (other type of shop or business)	Service Station Owner
Cardord News (Glasgow)		Tobacco retailer (convenience store)	
Cards and Gifts 'R' Us (Essex)		Tobacco retailer (convenience store)	
Cash and Carry (Mablethorpe)		Tobacco retailer (convenience store)	
Castleford Stores		Tobacco retailer (convenience store)	
Cavern News (Liverpool)		Tobacco retailer (convenience store)	
Centra (Derry)		Tobacco retailer (convenience store)	
Charlie's Candy (Sidcup)		Tobacco retailer (convenience store)	
Churchill Drinks (Hall Green)		Tobacco retailer (convenience store)	
City News (Leicester)		Tobacco retailer (convenience store)	
Claire's @ Queen Margaret Drive (Glasgow)		Tobacco retailer (convenience store)	
Classic Services North East Ltd (Billingham)		Tobacco retailer (convenience store)	
Clavert Newsagents Ltd (Port St Mary)		Tobacco retailer (convenience store)	



Cmabridge Grove (Eccles)		Tobacco retailer (convenience store)	
Coalway News & Booze (Wolverhampton)		Tobacco retailer (convenience store)	
Cofton Mini Market (Birmingham)		Tobacco retailer (convenience store)	
Cofton News and Wines (Birmingham)		Tobacco retailer (convenience store)	
Cogans (Carmarthen)		Tobacco retailer (convenience store)	
Colchester News Ltd (Colchester)		Tobacco retailer (convenience store)	
Cole Valley News & Off-license		Tobacco retailer (convenience store)	
Comedy Fair (Southall)		Tobacco retailer (convenience store)	
Common Lane		Tobacco retailer (convenience store)	
Connoisseurs Wine Ltd (Southend-on-sea)		Tobacco retailer (convenience store)	
Coombs Store (Birmingham)		Tobacco retailer (convenience store)	
Copelands (Sidcup)		Tobacco retailer (convenience store)	
Corner Stores (Oswestry)		Tobacco retailer (convenience store)	
Corse Hill Mini Market (Manchester)		Tobacco retailer (convenience store)	
Costcutter (Bishopton)		Tobacco retailer (convenience store)	
Costcutter (Bolton)		Tobacco retailer (convenience store)	

Costcutter (Bullesley)		Tobacco retailer (convenience store)	
Costcutter (Coleraine)		Tobacco retailer (convenience store)	
Costcutter (Coventry)		Tobacco retailer (convenience store)	
Costcutter (Mansfield)		Tobacco retailer (convenience store)	
Costcutter (Sheffield)		Tobacco retailer (convenience store)	
Costcutter (Sunderland)		Tobacco retailer (convenience store)	
Costcutter (Wigan)		Tobacco retailer (convenience store)	
Costcutter (Worcester Park)		Tobacco retailer (convenience store)	
Countdown Family Store (Dundee)		Tobacco retailer (convenience store)	
Countdown Family Store (Forfar)		Tobacco retailer (convenience store)	
Country Stores (None Given)		Tobacco retailer (convenience store)	
Countryside Store Ltd (Bale)		Tobacco retailer (convenience store)	
Creative Production Workshop		Business involved in the design or manufacture of packaging	
Cross News (London)		Tobacco retailer (convenience store)	
Cross Roads Off-License (Wakefield)		Tobacco retailer (convenience store)	

D Robertson Newsagent (Birkenhead)		Tobacco retailer (convenience store)	
Dafen Service Station (Llanelli)		Tobacco retailer (convenience store)	Service Station Owner
Daily News (High Peak)		Tobacco retailer (convenience store)	
David Jones Design Limited		Business involved in the design or manufacture of packaging	
Davidoff Distribution (UK) LIMITED	Accountant	Wholesale tobacco seller	
Day To Day Limited (Isle of Man)		Tobacco retailer (convenience store)	
Day to Day Ltd		Tobacco retailer (convenience store)	
Day Today (Hamilton)		Tobacco retailer (convenience store)	
Day Today (Lanark)		Tobacco retailer (convenience store)	
Day Today (Motherwell)		Tobacco retailer (convenience store)	
Dee Bee Cash & Carry	Buyer	Wholesale tobacco seller	
Dee Jay Ltd (Mordern)		Tobacco retailer (convenience store)	
Dee's Convenience (Hayling Island)		Tobacco retailer (convenience store)	
Detleys Supermarkets (Cowley)		Tobacco retailer (convenience store)	
Dhamecha Foods Limited		Tobacco retailer (convenience store)	
DHL Daily Stores (Walsall)		Tobacco retailer (convenience store)	

Dhruv News (Walsall)		Tobacco retailer (convenience store)	
Dorchester Newsagents (Stockport)		Tobacco retailer (convenience store)	
DRA News (Newport)		Tobacco retailer (convenience store)	
Drinks World (Bellshill)		Tobacco retailer (convenience store)	
Drum Street Supermarket (Edinburgh)		Tobacco retailer (convenience store)	
Duncan's Mini Market (Preston)		Tobacco retailer (convenience store)	
Edd Herring Services Ltd	Managing Director	Retail representative organisation	
Edwards @ Bebington (Bebington)		Tobacco retailer (other type of shop or business)	Service Station Owner
Edwards Lane (Mansfield)		Tobacco retailer (convenience store)	
Elm Lane News (Sheffield)		Tobacco retailer (convenience store)	
Elmleigh Con Store Ltd (Leigh-on-sea)		Tobacco retailer (convenience store)	
Elmsell Post Office (Elmsell)		Tobacco retailer (convenience store)	
Emmerton News (Wolverhampton)		Tobacco retailer (convenience store)	
Esher Wines	Retail Newsagents	Tobacco retailer (convenience store)	
Essentra	Corporate Affairs Director	Business involved in the design or manufacture of packaging	

Essex Mart (Southend-on-sea)		Tobacco retailer (convenience store)	
ET White & Sons (Horevalley)		Tobacco retailer (convenience store)	
Euro Wines (Liverpool)		Tobacco retailer (convenience store)	
Exeter International Airport		Tobacco retailer (other type of shop or business)	
Falcon News		Tobacco retailer (convenience store)	
Family Choice Superstore (Anstey)		Tobacco retailer (convenience store)	
Family Mart Limited (Lingdale)		Tobacco retailer (other type of shop or business)	Service Station Owner
Family Shopper		Tobacco retailer (convenience store)	
Farah News (Glasgow)		Tobacco retailer (convenience store)	
Fazal and Sons (Edinburgh)		Tobacco retailer (convenience store)	
Flatfoot Sam's (Cwmbran)		Tobacco retailer (convenience store)	
Food and Wine (Nottingham)		Tobacco retailer (convenience store)	
Foodfare (Wolverhampton)		Tobacco retailer (convenience store)	
Forgewood Post Office (Motherwell)		Tobacco retailer (convenience store)	
Fountain News (Cheshire)		Tobacco retailer (convenience store)	

Fountain Street News (Leeds)		Tobacco retailer (convenience store)	
Frances St News (Newtownards)		Tobacco retailer (convenience store)	
Francis Street News (Leicester)		Tobacco retailer (convenience store)	
Freddies (Glasgow)		Tobacco retailer (convenience store)	
Fudge Newsagents (Glasgow)		Tobacco retailer (convenience store)	
G & E Wallage Ltd (Chesterfield)		Tobacco retailer (convenience store)	
G 7 Speed	Retail Newsagents	Tobacco retailer (convenience store)	
G K Supermarket (Leicester)		Tobacco retailer (convenience store)	
Ganas Food & Wine	Retail Newsagents	Tobacco retailer (convenience store)	
Gatwick Airport Limited		Tobacco retailer (other type of shop or business)	
GAWITH HOGGARTH T.T. Ltd	National Sales Manager	Business involved in the design or manufacture of packaging	
Geoff's Convenience Store (Belper)		Tobacco retailer (convenience store)	
Ghedrul Services (Oswestry)		Tobacco retailer (convenience store)	
Gladstone Convenience (Darlington)		Tobacco retailer (convenience store)	
Glendale Stores Ltd (Belfast)		Tobacco retailer (convenience store)	

Gods Gift (Bilston)		Tobacco retailer (convenience store)	
Grain Handler USA	President	Other	Grain Handler is a leading manufacturer of patented grain handling equipment, with an emphasis on “Continuous Mix-Flow Dryers.”
Gravelly Lane News (Erdington)		Tobacco retailer (convenience store)	
Greenley's Wine Ltd (Milton Keynes)		Tobacco retailer (convenience store)	
Group 3 News (Renfrew)		Tobacco retailer (convenience store)	
Gurpreet Singh Ltd (Manchester)		Tobacco retailer (convenience store)	
Hadley Park Stores (Hadley)		Tobacco retailer (convenience store)	
Hambleton Service Station (Hambleton)		Tobacco retailer (other type of shop or business)	Service Station Owner
Hambleton Village Off License (Hambleton)		Tobacco retailer (convenience store)	
Hamilton News (Belfast)		Tobacco retailer (convenience store)	
Harbourside Gift Shop (North Yorkshire)		Tobacco retailer (convenience store)	
Harvil Road Post Office (Middlesex)		Tobacco retailer (convenience store)	
Havana House Ltd	Director	Specialist tobacconist	
Haybridge News (Telford)		Tobacco retailer (convenience store)	
Hazel's Newsagents (County Down)		Tobacco retailer (convenience store)	

Heathrow Airport	Head of Category	Tobacco retailer (other type of shop or business)	
Heera Convenience store	Manager	Tobacco retailer (convenience store)	
Heera International Food Store		Tobacco retailer (convenience store)	
Heintz van Landewyck		Business involved in the design or manufacture of packaging	
Herdan News (Macclesfield)		Tobacco retailer (convenience store)	
High Street News (Derbyshire)		Tobacco retailer (convenience store)	
Hill Wood Newsmarket (Northfield)		Tobacco retailer (convenience store)	
Hinderwell Post Office (Saltburn)		Tobacco retailer (convenience store)	
Hollybane News (Birmingham)		Tobacco retailer (convenience store)	
Holmfield Road New (Blackpool)		Tobacco retailer (convenience store)	
Home Farm Convenience Store (Leicester)		Tobacco retailer (convenience store)	
Honeycomb News & Supermarkets (Southend-on-sea)		Tobacco retailer (convenience store)	
Hunnyhill Stores Group	Partner	Tobacco retailer (convenience store)	
Hunters & Frankau Limited		Tobacco retailer (other type of shop or business)	
Huong Que Supermarket (Birmingham)		Tobacco retailer (convenience store)	



Idea Couture Ltd.	Managing Director	Business involved in the design or manufacture of packaging	Business & Innovation Consultancy
Iggesund	Sales Manager Tobacco	Business involved in the design or manufacture of packaging	
Ignis	Group Account Director	Business involved in the design or manufacture of packaging	
Ignis Ltd		Business involved in the design or manufacture of packaging	
Illegible		Tobacco retailer (convenience store)	
Illegible		Tobacco retailer (convenience store)	
Illegible		Tobacco retailer (convenience store)	
Illegible		Tobacco retailer (convenience store)	
Illegible		Tobacco retailer (convenience store)	
Illegible		Tobacco retailer (convenience store)	
Illegible		Tobacco retailer (convenience store)	
Illegible		Tobacco retailer (convenience store)	
Illegible		Tobacco retailer (convenience store)	
Illegible (Blaydon on Tyne)		Tobacco retailer (convenience store)	

Illegible (Bramley)		Tobacco retailer (convenience store)	
Illegible (Castleford)		Tobacco retailer (other type of shop or business)	Service Station Owner
Illegible (Glasgow)		Tobacco retailer (convenience store)	
Illegible (Glasgow)		Tobacco retailer (convenience store)	
Illegible (Kendal)		Tobacco retailer (convenience store)	
Illegible (Walsall)		Tobacco retailer (convenience store)	
imperial Tobacco	Sales Representative	Tobacco manufacturer	
Imperial Tobacco Australia		Tobacco manufacturer	
Imperial Tobacco Ltd		Tobacco manufacturer	
IMY's Stop 'N' Shop (Cowley)		Tobacco retailer (convenience store)	
Ingham Mini Market (Lincoln)		Tobacco retailer (convenience store)	
J & K Supermarket (Hayling Island)		Tobacco retailer (convenience store)	
J & K Supermarket (Hayling Island)		Tobacco retailer (convenience store)	
J J Fox Trading Ltd	Managing Director	Wholesale tobacco seller	
J.Cortès Cigars	Managing Director	Tobacco manufacturer	
J.W.I. Perkins and Son (Horncastle)		Tobacco retailer (convenience store)	
J&S General Store (Walsall)		Tobacco retailer (convenience store)	
Japan Tobacco Inc. (JT)		Tobacco manufacturer	

Japan Tobacco International (JTI)		Tobacco manufacturer	
Jaspals (Nottingham)		Tobacco retailer (convenience store)	
Javed Brothers T/A (Glasgow)		Tobacco retailer (convenience store)	
Jay's Convenience (Nottingham)		Tobacco retailer (convenience store)	
Joes News & Wine (Wolverhampton)		Tobacco retailer (convenience store)	
Johal Uquor Store	Retail Newsagents	Tobacco retailer (convenience store)	
John Hollingsworth & Son Ltd		Wholesale tobacco seller	
Johnny's Local (Renfrew)		Tobacco retailer (convenience store)	
JPS Stores (Manchester)		Tobacco retailer (convenience store)	
Julie's (Telford)		Tobacco retailer (convenience store)	
K & J Convenience Store (Cadishead)		Tobacco retailer (convenience store)	
K'S Wines (Birmingham)		Tobacco retailer (convenience store)	
Kelly's Eurospar (Moneymore)		Tobacco retailer (convenience store)	
KPMG LLP	Partner	Other	Independent audit, tax and advisory business
Landmark Wholesale	Managing Director	Tobacco retailer (other type of shop or business)	
Lawrence Hunt & Co Ltd	Managing Director	Tobacco retailer (convenience store)	
Leo's Primer Store (Worsley)		Tobacco retailer (convenience store)	

Lewis Property Development LTD	Company Secretary	Tobacco retailer (convenience store)	
Lifestyle Express (Walsall)		Tobacco retailer (convenience store)	
Lifestyle Express (Wolverhampton)		Tobacco retailer (convenience store)	
Lindas News (Darlington)		Tobacco retailer (convenience store)	
Liverpool John Lennon Airport	Retail Director	Other	Airport Owner who has a Duty Free Store at our location
Llanelli Market (Llanelli)		Tobacco retailer (convenience store)	
LLANGYBI STORES	Proprietor	Tobacco retailer (convenience store)	
Lomas News (Lancashire)		Tobacco retailer (convenience store)	
Londis (Edinburgh)		Tobacco retailer (convenience store)	
Londis (Erdington)		Tobacco retailer (convenience store)	
Londis (Loughborough)		Tobacco retailer (convenience store)	
Londis (Preston)		Tobacco retailer (convenience store)	
Londis (Sidcup)		Tobacco retailer (convenience store)	
Londis (Sutton)		Tobacco retailer (convenience store)	
Londis (Waterloo)		Tobacco retailer (convenience store)	
Londis Harefield (Harefield)		Tobacco retailer (convenience store)	

Londis Store (Bootle)		Tobacco retailer (convenience store)	
Londis Store (Swillington)		Tobacco retailer (convenience store)	
Londis Tickford Superstore (Newport)		Tobacco retailer (convenience store)	
Lord Lone Post Office (Manchester)		Tobacco retailer (convenience store)	
Lorfords (Bury St Edmunds)		Tobacco retailer (convenience store)	
Lucky's Off License (Leeds)		Tobacco retailer (convenience store)	
Lurgan Filling Station (Lurgan)		Tobacco retailer (convenience store)	
Luxmy Enterprise	Retail Newsagents	Tobacco retailer (convenience store)	
Lyndhurst Store (Blidworth)		Tobacco retailer (convenience store)	
Lyndhurst Stores (Mansfield)		Tobacco retailer (convenience store)	
M & S Stores (Cumbria)		Tobacco retailer (convenience store)	
M. Keevens's News (Derbyshire)		Tobacco retailer (convenience store)	
MACE (Carnlough)		Tobacco retailer (convenience store)	
Mackenzie General Store (Holloway)		Tobacco retailer (convenience store)	
Madhu Stores (Leeds)		Tobacco retailer (convenience store)	
Malik Newsagents (Glasgow)		Tobacco retailer (convenience store)	

Manor Rd Stores (Scarborough)		Tobacco retailer (convenience store)	
Manor Store (Horbury)		Tobacco retailer (convenience store)	
Maple Street Stores	Partner	Tobacco retailer (other type of shop or business)	
Mare Street Service Station (London)		Tobacco retailer (other type of shop or business)	Service Station Owner
Market News (County Durham)		Tobacco retailer (convenience store)	
Marsh Hill News (London)		Tobacco retailer (convenience store)	
Marty's News & Booze (Birmingham)		Tobacco retailer (convenience store)	
Maya Stores (Llanelli)		Tobacco retailer (convenience store)	
Maz Newsagents (Beswick)		Tobacco retailer (convenience store)	
McCrystal's Filling Station		Tobacco retailer (convenience store)	
McDonalds Todays (County Armagh)		Tobacco retailer (convenience store)	
McKeevers News (Derry)		Tobacco retailer (convenience store)	
Meeka Wines (Birmingham)		Tobacco retailer (convenience store)	
Mellors News (Barnsley)		Tobacco retailer (convenience store)	
Metheringham Convenience Store (Lincoln)		Tobacco retailer (convenience store)	

Metro C21 Supermarket		Tobacco retailer (convenience store)	
Mili Newsagent (Middlesex)		Tobacco retailer (convenience store)	
Millbank News	Darlington Retailer	Tobacco retailer (convenience store)	
Mint Convenience Store (Stockport)		Tobacco retailer (convenience store)	
Moore's Costcutter (County Antrim)		Tobacco retailer (convenience store)	
Morely Stores (Leeds)		Tobacco retailer (convenience store)	
Morris & Co (Thornton Heath)		Tobacco retailer (convenience store)	
Mount General Store (Birkenhead)		Tobacco retailer (convenience store)	
Moxley Post Office (Moxley)		Tobacco retailer (convenience store)	
MRP Limited (Canterbury)		Tobacco retailer (convenience store)	
MSA (Leeds)		Tobacco retailer (convenience store)	
Multi Packaging Solutions		Business involved in the design or manufacture of packaging	
Mulvir & Sons Ltd (London)		Tobacco retailer (convenience store)	
Mulvir & Sons Ltd (London)		Tobacco retailer (convenience store)	
Murshid's New (Liverpool)		Tobacco retailer (convenience store)	

Myrtle News and Booze		Tobacco retailer (convenience store)	
n/a	n/a	Tobacco retailer (convenience store)	
n/a	n/a	Tobacco retailer (convenience store)	
n/a	Newsagent	Tobacco retailer (convenience store)	
n/a	Independent Retailer	Tobacco retailer (convenience store)	
Nagra Stores (Birmingham)		Tobacco retailer (convenience store)	
National News (Wostenholme Road)		Tobacco retailer (convenience store)	
Natsons (London)		Tobacco retailer (convenience store)	
Neha News (Hacuney)		Tobacco retailer (convenience store)	
Neil's Store (Kirkastall)		Tobacco retailer (convenience store)	
Nesscliffe Service Station Ltd (Shrewsbury)		Tobacco retailer (other type of shop or business)	Service Station Owner
New Hall Lane Post Office (Preston)		Tobacco retailer (convenience store)	
Newcastle International Airport Ltd	Planning and Corporate Affairs Director	Other	Airport
News Stand (Wakefield)		Tobacco retailer (convenience store)	
Newsboard Ltd (County Durham)		Tobacco retailer (convenience store)	
Newscentre (Eastcote)		Tobacco retailer (convenience store)	



Newsflash (Belfast)		Tobacco retailer (convenience store)	
Newspoint (Pinner)		Tobacco retailer (convenience store)	
Newton Post Office (Derbyshire)		Tobacco retailer (convenience store)	
Newtrade Publishing Ltd	Retail Newsagent Editor	Retail representative organisation	
Nisa (Ammanford)		Tobacco retailer (convenience store)	
Nisa (Carmanthenshire)		Tobacco retailer (convenience store)	
Nisa (Drefach)		Tobacco retailer (convenience store)	
Nisa (Farnworth)		Tobacco retailer (convenience store)	
Nisa (Gorslas)		Tobacco retailer (convenience store)	
Nisa (Lanark)		Tobacco retailer (convenience store)	
Nisa (Llanelli)		Tobacco retailer (convenience store)	
Nisa (North Yorkshire)		Tobacco retailer (convenience store)	
Nisa (Peterborough)		Tobacco retailer (convenience store)	
Nisa (Peterborough)		Tobacco retailer (convenience store)	
Nisa (Peterborough)		Tobacco retailer (convenience store)	
Nisa Extra (Riddings)		Tobacco retailer (convenience store)	

Nisa Local (Alfreton)		Tobacco retailer (convenience store)	
Nisa Local (Astley)		Tobacco retailer (convenience store)	
Nisa Local (Cullybackey)		Tobacco retailer (convenience store)	
Nisa Local (Holland Park)		Tobacco retailer (convenience store)	
Nisa Local (Preston)		Tobacco retailer (convenience store)	
Nisa Local (Sale)		Tobacco retailer (convenience store)	
Nisa Local (Walsall)		Tobacco retailer (convenience store)	
Nisa Supermarkets (Huddersfield)		Tobacco retailer (convenience store)	
None Given		Tobacco retailer (convenience store)	
None Given		Tobacco retailer (convenience store)	
None Given		Tobacco retailer (convenience store)	
None Given		Tobacco retailer (convenience store)	
None Given		Tobacco retailer (convenience store)	
None Given		Tobacco retailer (convenience store)	
None Given		Tobacco retailer (convenience store)	
None Given		Tobacco retailer (convenience store)	
None Given		Tobacco retailer (convenience store)	





None Given		Tobacco retailer (convenience store)	
None Given		Tobacco retailer (convenience store)	
None Given		Tobacco retailer (convenience store)	
Norman Watt & Son Limited (County Antrim)		Tobacco retailer (convenience store)	
Not Disclosed	Retail Newsagents	Tobacco retailer (convenience store)	
Not Disclosed	Retail Newsagents	Tobacco retailer (convenience store)	
Not Disclosed	Retail Newsagents	Tobacco retailer (convenience store)	
Not Disclosed	Retail Newsagents	Tobacco retailer (convenience store)	
Not Disclosed	Retail Newsagents	Tobacco retailer (convenience store)	
Not Disclosed	Retail Newsagents	Tobacco retailer (convenience store)	
Not Disclosed	Retail Newsagents	Tobacco retailer (convenience store)	
Nude Brand Consulting Ltd	Creative Partner	Business involved in the design or manufacture of packaging	
O'Kanes Superstore Ltd (County Armagh)		Tobacco retailer (convenience store)	
O'Reilly's Wholesale Ltd	Director	Wholesale tobacco seller	
One Stop Cornershop (Wallasey)		Tobacco retailer (convenience store)	
One Stop Shop Londis (Chorley)		Tobacco retailer (convenience store)	
One Wines (Manchester)		Tobacco retailer (convenience store)	

Opolka Ltd	Managing Director	Tobacco retailer (convenience store)	
Oval Fine Wines and Beers		Tobacco retailer (convenience store)	
Pallim News (Sunderland News)		Tobacco retailer (convenience store)	
Parkers (Peterborough)		Tobacco retailer (convenience store)	
Parkside Flexibles (Europe) Limited		Business involved in the design or manufacture of packaging	
Path	Director	Business involved in the design or manufacture of packaging	
Path Ltd		Business involved in the design or manufacture of packaging	
Pavan's Minimarket (Rothwell)		Tobacco retailer (convenience store)	
Pencoed Muro Service Station		Tobacco retailer (other type of shop or business)	Service Station Owner
Philip Morris Limited (PMI)		Tobacco manufacturer	
Plumstead Best and Save (Plumstead)		Tobacco retailer (convenience store)	
Post Office (Auckley)		Tobacco retailer (convenience store)	
Post Office (Holland-on-sea)		Tobacco retailer (convenience store)	
Post Office Store (Deanshanger)		Tobacco retailer (convenience store)	

Prairie Oak Capital		Other type of business representative organisation	
Premier (Dundee)		Tobacco retailer (convenience store)	
Premier (Edinburgh)		Tobacco retailer (convenience store)	
Premier (New Oscott)		Tobacco retailer (convenience store)	
Premier Essentials (Tutshill)		Tobacco retailer (convenience store)	
Premier Jasup Superstore (Nottingham)		Tobacco retailer (convenience store)	
Premier Maldon		Tobacco retailer (convenience store)	
Price Buster (Birmingham)		Tobacco retailer (convenience store)	
Pricecracker (Dundee)		Tobacco retailer (convenience store)	
R & M News (Wallasey)		Tobacco retailer (convenience store)	
R & P Chappelow Ltd (Goole)		Tobacco retailer (convenience store)	
R & S Patel Limited (Leicester)		Tobacco retailer (convenience store)	
R Late Store (Birkenhead)		Tobacco retailer (convenience store)	
Rainbow Convenience Store (Cheshire)		Tobacco retailer (convenience store)	
Rea's Today (Lanark)		Tobacco retailer (convenience store)	
Redd Solicitors LLP		Other	Legal firm

Reetmister		Business involved in the design or manufacture of packaging	
Retail Newsagents	n/a	Tobacco retailer (convenience store)	
Rhuvaar (Bishopton)		Tobacco retailer (convenience store)	
Roff Avenue Store (Bedford)		Tobacco retailer (convenience store)	
Ronnies Newsagents (Leeds)		Tobacco retailer (convenience store)	
Rujal News (Clacton-on-sea)		Tobacco retailer (convenience store)	
Rupas Mini Market (Nottingham)		Tobacco retailer (convenience store)	
S D Metha Newsagent (Croydon)		Tobacco retailer (convenience store)	
S.K. Retailers (Glasgow)		Tobacco retailer (convenience store)	
S.S Foodstores (Motherwell)		Tobacco retailer (convenience store)	
S&H News (Glasgow)		Tobacco retailer (convenience store)	
Sakthi Service Station Limited	Service Station Owner	Tobacco retailer (other type of shop or business)	
Scandinavian Tobacco Group	Head of Public Affairs	Wholesale tobacco seller	
Seaforth News Post Office (Seaforth)		Tobacco retailer (convenience store)	
Select 'N' Save (Nottingham)		Tobacco retailer (convenience store)	



Select 2 Save (West Heath)		Tobacco retailer (convenience store)	
Select and Save (Bagueley)		Tobacco retailer (convenience store)	
Select and Save (Bromsgrove)		Tobacco retailer (convenience store)	
Select and Save (Seaforth)		Tobacco retailer (convenience store)	
Select Express	Retail Newsagents	Tobacco retailer (convenience store)	
Sheehys (County Tyrone)		Tobacco retailer (convenience store)	
Shelfield Post Office (Walsall)		Tobacco retailer (convenience store)	
Shootershill Store Lts (Costcutter)		Tobacco retailer (convenience store)	
Shop N Save	Retail Newsagents	Tobacco retailer (convenience store)	
Shop-Rite Grocers (Preston)		Tobacco retailer (convenience store)	
Shopsmart (Lanark)		Tobacco retailer (convenience store)	
Shopsmart (Penfrew)		Tobacco retailer (convenience store)	
Shree Rad News (Whitford)		Tobacco retailer (convenience store)	
SICPA UK	Director Corporate Affairs	Other	Provision of secure traceability and authentication systems to governments
Sids Supermarket (Cross Hands)		Tobacco retailer (convenience store)	
Simmons & Simmons LLP		Other	

Smith's Newsagent (Epsom)		Tobacco retailer (convenience store)	
Smiths Corner Stores (Manby)		Tobacco retailer (convenience store)	
SOCOTAB	President and CEO	Wholesale tobacco seller	
Soouthwold Express (London)		Tobacco retailer (convenience store)	
South Cliff Mini Market (Bridlington)		Tobacco retailer (convenience store)	
South Elmsall Convenience Store (Pontefract)		Tobacco retailer (convenience store)	
Southcliffe Stores (Clacton)		Tobacco retailer (convenience store)	
Southfields Food & Wine (Southfields)		Tobacco retailer (convenience store)	
Sowe Waste Post Office (Coventry)		Tobacco retailer (convenience store)	
Spalding News (Spalding)		Tobacco retailer (convenience store)	
Spar	Director	Tobacco retailer (convenience store)	
Spar (Aspen Way, Wolverhampton)		Tobacco retailer (convenience store)	
Spar (Belfast)		Tobacco retailer (convenience store)	
Spar (Brightlingsea)		Tobacco retailer (convenience store)	
Spar (Carluke)		Tobacco retailer (convenience store)	
Spar (County Tyrone)		Tobacco retailer (convenience store)	

Spar (Duntocher)		Tobacco retailer (convenience store)	
Spar (Fleetwood)		Tobacco retailer (convenience store)	
Spar (Llanelli)		Tobacco retailer (convenience store)	
Spar (No location given)		Tobacco retailer (convenience store)	
Spar (Portsmouth)		Tobacco retailer (convenience store)	
Spar Exorna Filling Station (Castlerock)		Tobacco retailer (convenience store)	
Spar Knott Road (Knott End On Sea)		Tobacco retailer (convenience store)	
Spar Store (Caistor)		Tobacco retailer (convenience store)	
Spar Store (Clydebank)		Tobacco retailer (convenience store)	
Spar Store (Pinchbeck)		Tobacco retailer (convenience store)	
Spar Thornton (Thornton-Cleveleys)		Tobacco retailer (convenience store)	
Spar Trinas Supermarket (Milton Keynes)		Tobacco retailer (convenience store)	
Spick and Span (Mablethorpe)		Tobacco retailer (convenience store)	
Square Newsagents (Wolverton)		Tobacco retailer (convenience store)	
SRA News (Birmingham)		Tobacco retailer (convenience store)	
Sri Thurka Service Station	Service Station Owner	Tobacco retailer (other type of shop or business)	

SRS News		Tobacco retailer (convenience store)	
St Andrews Food and Wine	Retail Newsagents	Tobacco retailer (convenience store)	
Stanley Bus Station Newsagents		Tobacco retailer (convenience store)	
Star Convenience Store (Birmingham)		Tobacco retailer (convenience store)	
Star News (Nottingham)		Tobacco retailer (convenience store)	
Stone Spar Stores Ltd	Managing Director	Tobacco retailer (convenience store)	
Strictly Liquor (Wolverhampton)		Tobacco retailer (convenience store)	
Sunny News (Southfields)		Tobacco retailer (convenience store)	
Sunrise food and wine (Bolton)		Tobacco retailer (convenience store)	
Supersaver (Bootle)		Tobacco retailer (convenience store)	
Supersaver (Bootle)		Tobacco retailer (convenience store)	
Supersaver (Liverpool)		Tobacco retailer (convenience store)	
Sussex Road Post Office and Stores		Tobacco retailer (convenience store)	
Swan Food (Holland Park)		Tobacco retailer (convenience store)	
Swillington Post Office (Swillington)		Tobacco retailer (convenience store)	
T/A Barrs Newagent (Edinburgh)		Tobacco retailer (convenience store)	

T/A Bens Stores (Edinburgh)		Tobacco retailer (convenience store)	
T/A Budgens (Southfields)		Tobacco retailer (convenience store)	
T/A Eastern Union (Edinburgh)		Tobacco retailer (convenience store)	
T/A Lorne News (Edinburgh)		Tobacco retailer (convenience store)	
T/A Melrose Post Office (Leicester)		Tobacco retailer (convenience store)	
T/A Pilrig Newsagent (Edinburgh)		Tobacco retailer (convenience store)	
T/A Woodfield Newsagents (Essex)		Tobacco retailer (convenience store)	
T/A Young's (Middlesex)		Tobacco retailer (convenience store)	
T&M Corner Shop (Nottingham)		Tobacco retailer (convenience store)	
TABAC World		Wholesale tobacco seller	
TANN UK Ltd.	Managing Director	Business involved in the design or manufacture of packaging	
TANNPAPIER GmbH	Yes	Other	Tipping paper manufacturer
Target Store (Glasgow)		Tobacco retailer (convenience store)	
Taylor News (Surbiton)		Tobacco retailer (convenience store)	
Taylors (Carmarthen)		Tobacco retailer (convenience store)	
Taylors News (Sheffield)		Tobacco retailer (convenience store)	

Thames Food and Wine	Retail Newsagents	Tobacco retailer (convenience store)	
Thandi News & Off License (Bedford)		Tobacco retailer (convenience store)	
Thandi Stores (Derby)		Tobacco retailer (convenience store)	
The Co-operative Group		Tobacco retailer (supermarket)	
The Food Corner (London)		Tobacco retailer (convenience store)	
The Forecourt Centre (Doagh)		Tobacco retailer (convenience store)	
The Garage (Comber)		Tobacco retailer (convenience store)	
The Link Service Station (Derry)		Tobacco retailer (other type of shop or business)	Service Station Owner
The Local Shop (Preston)		Tobacco retailer (convenience store)	
The Maid Marion Store (Sneinton)		Tobacco retailer (convenience store)	
The Oval (Sidcup)		Tobacco retailer (convenience store)	
The Paper Chase (Lurgan)		Tobacco retailer (convenience store)	
The Paper Shop (Middleton District Centre)		Tobacco retailer (convenience store)	
The Tap House (Cleveleys)		Tobacco retailer (convenience store)	
Throstle Lane Post Office		Tobacco retailer (convenience store)	
Today's Local (Illegible)		Tobacco retailer (convenience store)	

Today's Local (Scarborough)		Tobacco retailer (convenience store)	
Tony Off License Ltd (Chorley)		Tobacco retailer (convenience store)	
Top News (Broseley)		Tobacco retailer (convenience store)	
TOR Imports		Wholesale tobacco seller	
Trademark Committee of Japan Intellectual Property Association	Leader of the 3rd sub-committee of Trademark Committee	Industry representative organisation	
Trees Newsagents (Hook)		Tobacco retailer (convenience store)	
Trierenberg Holding AG	Yes	Other	Tipping paper manufacturer
Trio's Newsagents		Tobacco retailer (convenience store)	
Trispen Stores		Tobacco retailer (convenience store)	
Trshna News (Edgeware Road)		Tobacco retailer (convenience store)	
Tugford News & Convenience Store (Birmingham)		Tobacco retailer (convenience store)	
Twickenham Supermarket (Merseyside)		Tobacco retailer (convenience store)	
Tynedale Newsagent (Tyseley)		Tobacco retailer (convenience store)	
U-Save (Motherwell)		Tobacco retailer (convenience store)	

Under Age Sales Ltd	Managing Director	Other	We are a social enterprise that specialises in helping retailers to tackle under age sales. We provide support, training, point-of-sale materials and advice to retailers. This includes support funded by the trade associations, industries and manufacturers of age restricted products, including the tobacco industry. All of the products that we deal with are highly controversial – that’s part of the reason why they are age restricted – be they alcohol, gambling, knives, fireworks or indeed tobacco.
Valley Parade Limited (Bradford)		Tobacco retailer (convenience store)	
Value Newsagents (Oakengates)		Tobacco retailer (convenience store)	
Vanika's Convenience Store (Preston)		Tobacco retailer (convenience store)	
VDM News (Chorley)		Tobacco retailer (convenience store)	
Village News (Essington)		Tobacco retailer (convenience store)	
Village News (South Wirral)		Tobacco retailer (convenience store)	
Village Newsagents (Cumbernauld)		Tobacco retailer (convenience store)	
Village Stores (Grimsby)		Tobacco retailer (convenience store)	
Virks Cut Price (Wolverhampton)		Tobacco retailer (convenience store)	
Wagstaffs (Clacton-on-sea)		Tobacco retailer (convenience store)	



Walkley News (Walkley)		Tobacco retailer (convenience store)	
Walsall Rd News (Birmingham)		Tobacco retailer (convenience store)	
Walton Stores (Chesterfield)		Tobacco retailer (convenience store)	
Waterloo Stores	Retail Newsagents	Tobacco retailer (convenience store)	
WDFG UK Ltd (World Duty Free Group)	Business Relations and External Affairs Director	Tobacco retailer (other type of shop or business)	
Weidenhammer Packaging Group (WPG)	Chief Executive Officer	Business involved in the design or manufacture of packaging	
West Bridgford Stores LTD (Nottingham)		Tobacco retailer (convenience store)	
West Coast Wine (Stockport)		Tobacco retailer (convenience store)	
Westfield Stores (Yeadon)		Tobacco retailer (convenience store)	
Westminster Wines (Blackpool)		Tobacco retailer (convenience store)	
Wharncliffe Side Post Office (Sheffield)		Tobacco retailer (convenience store)	
Whitehouse Convenience Store (Lower Walkley)		Tobacco retailer (convenience store)	
Wickhams Food and Wine (Shirley)		Tobacco retailer (convenience store)	
Widmer End Supermarket	Retail Newsagents	Tobacco retailer (convenience store)	
Wiggleys Corner Store (Oxford)		Tobacco retailer (convenience store)	

Wilkinson's Spar (Coleraine)		Tobacco retailer (convenience store)	
Windmill News (Derby)		Tobacco retailer (convenience store)	
Windmill Store (Lisburn)		Tobacco retailer (convenience store)	
Windsor Mini Market (Sulford)		Tobacco retailer (convenience store)	
Winnock Stores (Colchester)		Tobacco retailer (convenience store)	
Worsborough Brige Post Office (Barnsley)		Tobacco retailer (convenience store)	
Wortley Wines & Spirits (Leeds)		Tobacco retailer (convenience store)	
Yafs News (Liverpool)		Tobacco retailer (convenience store)	
Yagnik & Co (Nottingham)		Tobacco retailer (convenience store)	
YNS News		Tobacco retailer (convenience store)	
unnamed business	Manager	Tobacco retailer (convenience store)	

## Organisations

Organisation Name	Job Title of Respondent	Type of Business or Sole Trader	Other type of business or sole trader
"20-20 Voice" Cancer (Reg No: 1156733)	Chairman	Health charity/NGO (working at national level)	
3 Towns Partnership		Other (please provide details below)	Local authority and other agency partnership
Airport Operators Association		Other type of business representative organisation	

AITS (Association of Independent Tobacco Specialists)		Retail representative organisation	
Aneurin Bevan University Health Board		University or research organisation	
APRAM (Association of Trade Marks and Designs rights Practitioners)	Présidente APRAM	Other type of business representative organisation	<p>APRAM – Association of Trade Marks and Designs rights Practitioners – is an international Association for</p> <p>French-speaking specialists in industrial and intellectual property, in particular Trade Marks and designs.</p> <p>The association, which now has more than 800 members, was founded more than 30 years ago and is opened to all French-speaking lawyers practising, all over the world, in the field of Trade</p>

			<p>Marks and designs. It gathers together in-house intellectual property specialists, Attorneys at law and Trade Mark Attorneys.</p> <p>The purpose of the association is notably to play an active role in, and be at the forefront of discussions concerning intellectual property and business law in France, Europe and the world, further to consultation or on its own initiative.</p> <p>Generally speaking and based upon its previous submissions and statements, APRAM is much concerned</p>
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			<p>about proposed legislation and measures to impose plain packaging and its</p> <p>Property (IP) like deprivation of Intellectual Property Rights (IPRs) and diluting the legal effects of IPRs and mainly trade mark rights on EU-wide and national level within the EU.</p>
ASH (Action on Smoking and Health)		Health charity/NGO (working at national level)	
ASH Scotland (Action on Smoking and Health)	Director of Policy and Engagement	Health charity/NGO (working at national level)	
ASH Wales (Action on Smoking and Health)		Health charity/NGO (working at national level)	
ASIPI - Inter-American Association of Intellectual Property	President	Other (please provide details below)	
Association of Chief Trading Standards Officers (ACTSO)	Chairman	Other (please provide details below)	The Association of Chief Trading Standards Officers (ACTSO) is the single membership organisation representing

			senior Trading Standards Managers from councils across England and Wales
Association of Convenience Stores		Retail representative organisation	
Association of Directors of Public Health		Local Authority	
Association of Directors of Public Health, West Midlands network		Local Authority	
Association of North East Councils		Local Authority	
Association of Respiratory Nurse Specialists	Nurse Consultant	Health charity/NGO (working at national level)	
Association of School and College Leaders	Public Affairs Director	Other (please provide details below)	Education membership organisation
Australasian Association of Convenience Stores (AACS)	Chief Executive Officer	Retail representative organisation	
Australian Council on Smoking and Health (ACOSH) & Professor Mike Daube		Health charity/NGO (working at national level)	
Australian Retailers Association	Executive Director	Retail representative organisation	
Barts Health NHS Trust	Public Health Specialty Registrar	NHS organisation	
Bath and North East Somerset Tobacco Action Network	Public Health Development and Commissioning Manager	Local tobacco control alliance	
Black Country Tobacco Control Alliance	Programme Manager-Tobacco	Local tobacco control alliance	

	Control		
Blackburn with Darwen Borough Council		Local Authority	
Blackpool Council, Director of Public Health	Director of Public Health	Local Authority	
Blackpool Teaching Hospitals NHS Foundation Trust	Chief Executive	Local Authority	
Bolton Council	Health improvement specialist	Local Authority	
Bristol Health and Wellbeing Board		Local Authority	
British American Business (BAB) and the British-American Business Council (BABC)		Other type of business representative organisation	
British American Tobacco (Belgium) works council	Secretary of the Works Council	Other (please provide details below)	British American Tobacco (Belgium) works council represents 150 employees in Belgium.
British Dental Association		Health charity/NGO (working at national level)	
British Heart Foundation		Health charity/NGO (working at national level)	
British Lung Foundation		Health charity/NGO (working at national level)	
British Lung Foundation (Scotland & Northern Ireland)		Health charity/NGO (working at national level)	
British Lung Foundation Wales		Health charity/NGO (working at national level)	
British Medical Association (BMA)	Policy Director	Health charity/NGO (working at national level)	
British Thoracic Society		Health charity/NGO (working at national level)	

Bury Council/ Bury Tobacco Alliance	Health Improvement Specialist	Local Authority	
Cambridgeshire County Council (Public Health)	Director of Public Health	Local Authority	<p>Following the consultation opening on the 26th June 2014, the consultation and a summary of the available evidence were presented by Dr Liz Robin, Director of Public Health, to Cambridgeshire County Council's Health Committee meeting in public on the 10th July 2014. The Health Committee has delegated responsibility for responding to consultations related to health and health services on the County Council's behalf. Following discussion,</p>



			the Health Committee approved the attached consultation response.
Canadian Cancer Society		Health charity/NGO (working at national level)	
Canadian Manufacturers & Exporters		Other type of business representative organisation	
Cancer Council of Victoria	Chief Executive Officer	Health charity/NGO (working at national level)	
Cancer Focus Northern Ireland		Health charity/NGO (working at national level)	
Cancer Research UK		Health charity/NGO (working at national level)	
CBI		Other type of business representative organisation	
Centre for Economics and Business Research		University or research organisation	
CENTROMARCA – ASSOCIAÇÃO PORTUGUESA DE EMPRESAS DE PRODUTOS DE MARCA (PORTUGUESE ASSOCIATION OF BRANDED PRODUCTS MANUFACTURERS)	Executive Director	Other (please provide details below)	IPR Association  CENTROMARCA – ASSOCIAÇÃO PORTUGUESA DE EMPRESAS DE PRODUTOS DE MARCA (PORTUGUESE ASSOCIATION OF BRANDED PRODUCTS MANUFACTURERS) - Founded in June 1994, currently

			<p>gathers 56 members holding more than 800 brands and has an annual turnover in the domestic market of around €6 000 million. Its missions relies on the promotion and the defense of trademarks as a means of differentiation and a guarantee of quality and innovation for the consumer, a factor of competitiveness, progress and wealth creation for the economy and an indispensable tool for promoting progress for the society as a whole.</p>
Cheshire & Merseyside Tobacco Alliance (CMTA)		Local tobacco control alliance	
Cheshire West and Chester Council Public Health	Health Improvement	Local Authority	

	Practitioner Advanced: Sexual Health and Smoking Cessation		
Children and Young People's Board	Lead Member Children, Young People and Families	Local Authority	
City of London Tobacco Control Alliance		Local tobacco control alliance	
City of York Council		Local Authority	
Community Safety Partnership	Lead Member Area Manageme nt & Community Safety	Local Authority	
Confederation of European Community Cigarette Manufacturers (CECCM)	EU Product Regulation Manager	Industry representative organisation	
Confederation of Industry of the Czech Republic		Industry representative organisation	
Consumer Packaging Manufacturers Alliance (CPMA)	DIRECTOR	Industry representative organisation	
Convenience Store magazine	Editor	Other (please provide details below)	Trade publication involved in supporting, representing and campaignin g on behalf of independent convenienc e store

			retailers.
Councillor Moncur chair of Sefton's Health and Wellbeing Board		Local Authority	
County Durham & Darlington Respiratory Network		NHS organisation	
County Durham Director of Public Health	Director of Public Health	Local Authority	
County Durham Stop Smoking Service	Health Improveme nt Manager	Local Authority	
Coventry Smokefree Alliance	Tobacco Control Co- ordinator	Local tobacco control alliance	
Czech Association for Branded Products (CSZV)	Executive Director	Other type of business representative organisation	Packaging representati ve organisation
Darlington Borough Council		Local Authority	
Derby City Council	Cabinet Member for Adults and Health	Local Authority	
Derbyshire County Council		Local Authority	
Derbyshire Health and Wellbeing Board		Local Authority	
Derbyshire, Nottinghamshire and Leicestershire Chamber of Commerce	Head of Information and Representa tion	Other type of business representative organisation	
Deutscher Zigarettenverband (German cigarettes manufacturers' association)	Secretary	Industry representative organisation	German cigarette manufacture rs' association
Devon & Somerset Trading Standards Service		Local Authority Trading Standards or Regulatory Services Department	
Dorset Tobacco Control Alliance	Head of Programme s (Health Improveme	Local tobacco control alliance	

	nt)		
Dudley Council (Public Health)		Local Authority	
Dudley Health & Wellbeing Board		Local Authority	
Durham County Council	Public Health Portfolio Lead	Local Authority	
Durham County Council (Public Health)		Local Authority	
East and north Herts NHS Trust	Midwife	NHS organisation	
East Sussex Trading Standards		Local Authority Trading Standards or Regulatory Services Department	
ECMA - the European Carton Makers Association		Industry representative organisation	
ESTA (European Smoking Tobacco Association)		Industry representative organisation	
European Cigar Manufacturers Association (EMCA)	Secretary General	Other type of business representative organisation	
European Communities Trade Mark Association (ECTA)	ECTA Legal Coordinator	Other (please provide details below)	ECTA, which was formed in 1980, is an organisation concerned primarily with trade marks and designs. ECTA has approximately 1,500 members, coming from all the Member States of the EU, with associate Members

		<p>from more than 50 other countries throughout the world. ECTA brings together those practising in the field of IP, in particular trade marks, designs and related matters. These professionals are lawyers, trade mark and patent attorneys, in-house lawyers concerned with IP matters from many industries, and other specialists in these fields. Members of ECTA represent more than 50% of all Community Trademarks . ECTA does not have any direct or indirect links to, and is not funded</p>
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			by, any section of the tobacco industry. ECTA is recognised by WIPO as a non-Government Organisation (NGO).
Federação Nacional de Hotéis, Restaurantes, Bares e Similares - FNHRBS		Other type of business representative organisation	
Federation of the Food and Drink Industries of the Czech Republic/FFDI	President	Industry representative organisation	
Federation of Wholesale Distributors	Chief Executive	Other type of business representative organisation	Wholesale Trade Association
Fiona Johnstone, Director of Public Health, Wirral Council		Local Authority	
FOREST		Other (please provide details below)	Consumer representative organisation
Fresh		Health charity/NGO (working at national level)	
Gateshead Council	Public Health programme lead	Local Authority	
Gateshead Smokefree Alliance	Public Health Programmes Lead	Other (please provide details below)	Gateshead Smokefree Alliance (partnership)
Gateshead, South Tyneside and Sunderland NHS Stop Smoking Service		NHS organisation	
German Advertising Federation (ZAW)	Lawyer	Industry representative organisation	
Gravure Association		Other type of business	

of the Americas		representative organisation	
Greater Manchester Tobacco Alliance		Local tobacco control alliance	
Halton Borough Council/Local Authority	Tobacco Control Coordinator	Local Authority	
Hartlepool Borough Council	Chief Executive	Local Authority	
Hartlepool Borough Council	Chief Executive	Local Authority	
Hartlepool Borough Council (Trading Standards)	Trading Standards Technical Officer (Tobacco Control)	Local Authority Trading Standards or Regulatory Services Department	The Local Authority Trading Standards service of Hartlepool Borough Council is at the forefront of many important tobacco control measures. The service also works in partnership with colleagues in HMRC and the Police to tackle the trade in illicit tobacco, these efforts have been successful in reducing the sales of smuggled and counterfeit cigarettes.



HealthNet	Chair of HealthNet	Other (please provide details below)	HealthNet is a collective voice representing the people of South Tyneside to debate, influence and shape local health and wellbeing policies and services.
Heart of Mersey		NHS organisation	
HELLENIC ASSOCIATION OF COMMUNICATIONS AGENCIES (HACA)	MEMBER OF THE IMC COMMITTEE	Other type of business representative organisation	
HELLENIC INTER-PROFESSIONAL ORGANISATION OF RAW TOBACCO	PRESIDENT OF THE BOARD OF DIRECTORS	Other type of business representative organisation	Inter-professional Organisation founded on the basis of EU legislation.
Hertfordshire County Council		Local Authority	
Hull Alliance on Tobacco (HALT)		Local tobacco control alliance	
Hywel Dda University Health Board		University or research organisation	
Importers and Exporters Association of Taipei (IEAT)	Secretary General	Other type of business representative organisation	
INDICAM	Director	Industry representative organisation	
Institute of Economic Affairs (IEA)	Director of Lifestyle Economics	University or research organisation	
Institute of Trade Mark Attorneys (ITMA)		Other type of business representative organisation	

International Chamber of Commerce - (Business Action to Stop Counterfeiting and Piracy (BASCAP))	Director of BASCAP	Other type of business representative organisation	
International Chamber of Commerce UK (ICC UK)		Other type of business representative organisation	
International Trademark Association	Policy Officer, Europe	Other (please provide details below)	The International Trademark Association (INTA) is a global association of trade mark owners and professionals dedicated to supporting trade marks and related intellectual property rights (IPRs) in order to protect consumers and to promote fair and effective commerce.
International Trademark Association (INTA)		Other type of business representative organisation	
Irish Cancer Society	Advocacy Officer	Health charity/NGO (working at national level)	
Islington Trading Standards		Local Authority Trading Standards or Regulatory Services Department	
ITPAC - The Imported Tobacco Products Advisory	Secretary-General	Other type of business representative organisation	

Council			
KEIDANREN - Japan Business Federation	International Affairs Bureau	Industry representative organisation	
Kent County Council		Local Authority	
Kirklees Council (Public Health)		Local Authority	
Lambeth and Southwark Tobacco Alliance	Public Health Officer	Local tobacco control alliance	
Lancashire County Council	Cabinet Member for Health and Wellbeing	Local Authority	
Leeds Tobacco Control Management Group		Local tobacco control alliance	
Leicester City Council	Deputy City Mayor	Local Authority	
Lithuanian Confederation of Industrialists (LPK)	Representative in Brussels	Industry representative organisation	
Liverpool & Sefton Chambers of Commerce	Chief Executive	Other type of business representative organisation	Chambers of Commerce
Liverpool Trading Standards		Local Authority Trading Standards or Regulatory Services Department	
London Borough of Barking and Dagenham		Local Authority	
London Borough of Enfield		Local Authority	
London Borough of Hackney	Director of Public Health	Local Authority	
London Boroughs of Camden and Islington's Joint Department of Public Health		Local Authority	
Making Smoking History in the North East		Local tobacco control alliance	

Manchester Airports Group	Head of Public Affairs	Other (please provide details below)	Airport operator with on-site retailers selling tobacco products.
Markenverband (German Brands Association)	Director Legal	Industry representative organisation	
Medway Council		Local Authority	
Medway Tobacco Control Alliance	Tobacco Control Programme Manager	Local tobacco control alliance	
Middlesbrough Council	Environmental Health Manager	Local Authority	
Middlesbrough Tobacco Control Alliance	Public Health Officer (Tobacco Control Alliance Lead)	Local tobacco control alliance	
Milton Keynes Council		Local Authority	
National Asian Business Association (NABA)		Other type of business representative organisation	
National Children's Bureau	Policy Officer	Health charity/NGO (working at national level)	
National Federation of Retail Newsagents (NFRN)		Retail representative organisation	
National Foreign Trade Council		Other type of business representative organisation	
Newcastle City Council	Public Health Specialist / Commissioner	Local Authority	Local Authority
Newcastle Upon Tyne hospitals Foundation Trust		NHS organisation	
NHS Grampian		NHS organisation	

NHS Health Scotland		Health charity/NGO (working at national level)	
Nisa Retail Ltd	Business Manager	Wholesale tobacco seller	
Norfolk County Council (Public Health)		Local Authority	
North East Public Protection Partnership		Other (please provide details below)	
North East Trading Standards Association (NETSA)	Chair	Local Authority Trading Standards or Regulatory Services Department	The North East Trading Standards Association, NETSA, is a partnership body representing the following Local Authority Trading Standards Services (LATSS) in the North East of England: Darlington, Durham, Gateshead, Hartlepool, Middlesbrough, Newcastle-upon-Tyne, North Tyneside, Northumberland, Redcar and Cleveland, South Tyneside, Stockton on Tees and Sunderland

North Tyneside Council		Local Authority	
Northumberland County Council Trading Standards	Trading Standards Manager - Urban	Local Authority Trading Standards or Regulatory Services Department	
Northumbria Police	Chief Superintendent	Other (please provide details below)	Northumbria Police as part of a Community Safety Partnership
Nottinghamshire Strategic Tobacco Alliance Group (STAG)	Public Health Manager	Local tobacco control alliance	
Oxfordshire County Council (Public Health)		Local Authority	
Plymouth City Council	Director of Public Health	Local Authority	
Plymouth City Council		Local Authority	
PROMARCA	President / Managing Director	Other type of business representative organisation	
Property Rights Alliance		Other type of business representative organisation	
Public Health - Thurrock Council	Health Improvement Officer	Local Authority	
Public Health Agency Northern Ireland		Health charity/NGO (working at national level)	
Public Health Dorset	Head of Programmes (Health Improvement)	Local Authority	
Public Health England (PHE)		Other (please provide details below)	
RMI Petrol Retailers Association		Retail representative organisation	
ROCHDALE BOROUGH HEALTH AND WELLBEING BOARD	CHAIR OF ROCHDALE BOROUGH HEALTH	Local Authority	

	AND WELLBEING BOARD		
Rotherham Public Health	Public Health Principal (Health Improvement)	Local tobacco control alliance	
Royal Borough of Greenwich (Trading Standards)		Local Authority Trading Standards or Regulatory Services Department	
Royal College of Midwives		Health charity/NGO (working at national level)	
Royal College of Nursing		Health charity/NGO (working at national level)	
Royal College of Physicians		Health charity/NGO (working at national level)	
Royal College of Physicians of Edinburgh		Health charity/NGO (working at national level)	
Rural Shops Alliance		Retail representative organisation	
Saarland University		University or research organisation	
Salford Trading Standards	Cabinet Member for Health and Wellbeing & Cabinet Member for Housing and Environment	Local Authority Trading Standards or Regulatory Services Department	
Sandwell Metropolitan Borough Council		Local Authority	
SCOT (Scottish Coalition On Tobacco)	Director of Policy and Engagement, ASH Scotland	Other (please provide details below)	SCOT - the Scottish Coalition on Tobacco - is a campaigning coalition of 13 health and medical

			organisations that have a shared interest in matters relating to tobacco and health.
Scottish Directors of Public Health		Health charity/NGO (working at national level)	
Scottish Grocers Federation		Retail representative organisation	
Scottish Wholesale Association		Retail representative organisation	
Sheffield Tobacco Control Programme Accountable Board		Local Authority	
Shropshire Council	Public Health Officer	Local Authority	
Smoke Free Hartlepool Alliance		Local tobacco control alliance	
Smoke Free Newcastle	Senior Health Improvement Specialist	Local tobacco control alliance	
Smoke Free Northumberland Alliance		Local tobacco control alliance	
Smoke Free Stockton Alliance	Responsibility of Health and Wellbeing of Stockton Borough Council & Health Improvement Specialist / Local Tobacco Control Lead	Local tobacco control alliance	
Smokefree Bristol Alliance on behalf of Bristol City Council		Local tobacco control alliance	



Smokefree Devon Alliance	Public Health Programme Manager	Local tobacco control alliance	
Smokefree Redcar & Cleveland Alliance	Health Improvement Commissioning Lead	Local Authority	
Smokefree South West	Director	Other (please provide details below)	Collaboratively commissioned regional tobacco control programme.
Somerset County Council		Local Authority	
South Gloucestershire Council	Specialist Health Improvement Practitioner	Local Authority	
South Tyneside Homes	Managing Director of South Tyneside Homes	Other (please provide details below)	South Tyneside Council's Housing Company
South Tyneside Tobacco Alliance	Director of Public Health	Local tobacco control alliance	
Stockport Council and Stockport Clinical Commissioning Group		NHS organisation	
Stoke on Trent Public Health	Senior Health Improvement Specialist-Long Term Conditions	Local Authority	
Sunderland City Council	Director of Public Health	Local Authority	
Sunderland Health and Wellbeing Board	Policy Lead for Health	Other (please provide details below)	Sunderland Health and Wellbeing

			Board response to the consultation on the introduction of regulations for standardised packaging of tobacco products. We are a multi agency partnership chaired by the leader of Sunderland City Council, Cllr Paul Watson.
Sunderland Tobacco Alliance	Public Health Lead	Local tobacco control alliance	
Swindon Smoke Free Alliance		Local tobacco control alliance	
Swindon Smokefree Alliance	Health Promotion Officer, Public Protection	Local tobacco control alliance	Response from Swindon Borough Council - Swindon Smokefree Alliance is a partnership of organisations who work together to drive down smoking prevalence and the associated harm and inequalities in health it

causes in Swindon. Partners include Swindon Borough Council, Trading Standards, Community Safety Partnership, Public Health, Licensing, Healthy Schools, Great Western Hospital NHS Foundation Trust, Wiltshire and Swindon Fire Service, Swindon Stop Smoking Service provided by Seqol and community representatives.

This response on behalf of Swindon Smokefree Alliance is in line with and in full support of the Action on Smoking and Health

			(ASH) response.
Tameside Tobacco Alliance	Public Health Programme Manager	Local tobacco control alliance	
TaxPayers' Alliance		Other (please provide details below)	
Tenovus	Chief Executive Officer	Health charity/NGO (working at national level)	
The Anti-Counterfeiting Group and British Brands Group		Other type of business representative organisation	
The Business Alliance of Slovakia	Executive Director	Industry representative organisation	
The Centre for Transnational Accountability (CTA)	Executive Director	Other (please provide details below)	Not-for-profit organization that counters illicit trade worldwide
The Institute of Public Health in Ireland	Public Health Development Officer (Policy)	Health charity/NGO (working at national level)	
The Law Society of Scotland		Other (please provide details below)	
The Lords and Commons Cigar Club	Convenor	Other organisation (please provide details below)	
The Royal College of Anaesthetists	Chief Executive	Health charity/NGO (working at national level)	
The Royal College of Radiologists (RCR)	President	Health charity/NGO (working at national level)	
The Young Britons' Foundation		Other (please provide details below)	
Tobacco Free Futures		Health charity/NGO (working at national level)	
Tobacco Free Luton		Local tobacco control alliance	
Tobacco Manufacturers Association of		Industry representative organisation	

Denmark			
Tobacco Retailers' Alliance		Local tobacco control alliance	
Trade related IPR Protection Association (TIPA)	Executive Vice Chairman	Other type of business representative organisation	IP Protection for Korean businesses
Trading Standards and Public Health on behalf of Hampshire County Council		Local Authority	
Trading Standards Institute		Other (please provide details below)	
Trading Standards North West	Co-ordinator	Other (please provide details below)	Trading Standards North West (TSNW) is a partnership of Trading Standards Services in 23 Local Authorities, working to provide a safe, healthy and fair environment for over 7 million consumers across the North West of England
Trans-Atlantic Business Council		Other type of business representative organisation	
U.S. Chamber of Commerce		Other type of business representative organisation	
UK Centre for Tobacco and Alcohol Studies	Professor	University or research organisation	
UK Health Forum		Health charity/NGO (working at national level)	

UK Travel Retail Forum	Secretary General	Retail representative organisation	
Unindustria	President	Industry representative organisation	
UNION OF TOBACCONISTS, RENTAL STANDS, SELLERS OF HABERDASHERY PRODUCTS AND PACKAGED CONFECTIONERY SPECIES OF MAKEDONIA	PRESIDENT	Retail representative organisation	
Unite (The Union)		Other (please provide details below)	Trade Union
Verband der deutschen Rauchtobakindustrie e.V. / German Smoking Tobacco Association	Managing Director	Other type of business representative organisation	
VNO-NCW	policy advisor	Other type of business representative organisation	VNO-NCW is the Confederation of Dutch Industry and Employers
WAG Welsh Dental Committee	Professor/ Consultant Oral Surgeon	NHS organisation	
Warrington Borough Council		Local Authority	
Warrington Council		Local Authority	
Warwickshire County Council	Director of Public Health	Local Authority	
Welsh Medical Committee		Health charity/NGO (working at national level)	
Wigan & Leigh Tobacco Control Alliance		Local tobacco control alliance	
Wiltshire Council		Local Authority	

Wolverhampton City Council (Public Health)		Local Authority	
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