

31 Aug 2026

Regulatory Policy Committee
Department for Business and Trade
Old Admiralty Building
Admiralty Place
London
SW1A 2DY



Association of Independent Tobacco Specialists

Subject: DHSC consultation-stage Impact Assessment on standardised packaging for tobacco products

Dear [REDACTED]

I am writing on behalf of the Association of Independent Tobacco Specialists (AITS) about the Department of Health and Social Care's July 2026 consultation-stage Impact Assessment on extending standardised packaging and other packaging requirements to tobacco products other than cigarettes and hand-rolling tobacco. AITS represents independent specialist tobacco retailers across the UK. Many of our members are small, family-run businesses whose livelihoods depend heavily on the sale of premium handmade cigars.

Our concern is simple. These proposals could have a direct and immediate effect on existing specialist tobacconists, yet the Impact Assessment does not properly show what that effect could be or whether the businesses most exposed would remain viable.

This issue was raised repeatedly during passage of the Tobacco and Vapes Bill. At Report Stage on 24 February, Baroness Merron acknowledged concerns that future packaging restrictions could affect specialist tobacconists more significantly than other retailers. She then told Parliament that

“it is absolutely not this Government’s intention for any future packaging requirements to put any small businesses, including specialist tobacconists, out of business.”

She also said that the Government intended to minimise the impact on businesses and that future published Impact Assessments would consider the effects on small businesses, including specialist tobacconists. Earlier, during Committee Stage, she had confirmed that further Impact Assessments would be prepared before secondary legislation. For our members, that was an important commitment. The practical question was always whether future packaging rules could be introduced without putting specialist shops at risk. We expected the Impact Assessment to answer that question clearly. In our view, it has not yet done so.

One problem is that the assessment does not reflect the handmade cigar market our members actually work in. A handmade cigar sale bears little resemblance to an everyday cigarette sale. Customers may visit a specialist shop only occasionally, spend time choosing between different cigars, and rely on the retailer’s knowledge and advice. Shops carry a wide range of brands, sizes and formats precisely because that choice is an important part of what a specialist tobacconist offers. Yet the Impact Assessment does not really examine this market separately from cigars more generally. The Department also acknowledges that, where it does not have evidence for the products now being regulated, it has used evidence concerning cigarettes and hand-rolling tobacco instead. From the point of view of our members, that raises an obvious question. Someone buying cigarettes every day interacts with packaging and the retail environment very differently from an occasional customer choosing a premium handmade cigar in a specialist shop. The frequency of purchase, price, product range and role of the retailer are all different. We are not saying that cigarette evidence can never be relevant. We are saying that the Department needs to explain why it can reasonably be applied to handmade cigars where those differences matter.

Our greatest concern, however, is the treatment of specialist tobacconists themselves. The Department estimates that there are around 1,700 “specialist tobacconists”, based on a broad business classification rather than the much narrower statutory definition. More importantly, the assessment spreads the estimated impact across 42,139 small and micro retailers. That simply does not reflect the way our market works. Handmade cigar sales are concentrated in specialist shops, while many of the other retailers included in that total will have little or no involvement in the premium cigar market. The result is an average estimated annual profit loss of only around £584 per business. A figure produced by averaging losses across tens of thousands of very different retailers tells us almost nothing about a specialist shop whose business is built around handmade cigars.

The Department itself accepts that specialist tobacconists may face greater losses and have fewer opportunities to replace those sales with other products. But it does not then work out what that

greater impact could mean for a specialist shop in practice or whether businesses which depend heavily on handmade cigars would remain viable. That is exactly the question the Impact Assessment should address but doesn't. AITS and its members are well placed to provide that evidence because they deal with these customers, products, and trading conditions every day.

There is also a serious concern about product range. Customers do not come to a specialist tobacconist to choose from a handful of cigars. They come because these shops offer depth of range, specialist knowledge, and choice across different brands, sizes, strengths, origins, and price points. Many of those cigars are produced and sold in relatively small volumes. If manufacturers decide that producing special packaging for the UK is no longer worthwhile for some of those products, the range available to our members' customers would shrink significantly.

That matters because reducing the range does not just mean losing sales on individual cigars. It weakens one of the main reasons customers use a specialist tobacconist in the first place. The Impact Assessment itself recognises that some cigar lines may be withdrawn rather than repackaged. Nor is that problem solved simply by giving businesses more time to comply. A longer implementation period does not help if, at the end of it, a specialist shop has lost an important part of the range or revenue on which it depends.

We recognise that this is a consultation-stage Impact Assessment and that the Department has said it will update it following the consultation. We hope the final assessment addresses these points and is properly reviewed by the RPC.

If the final Impact Assessment is submitted to the RPC, we would ask the Committee to look particularly closely at whether the Department has actually addressed these problems. Has it looked separately at the specialist shops most dependent on handmade cigars? Has it used figures that reflect how those businesses really trade? Has it considered what a substantial loss of product range would mean for them? And, where it continues to rely on evidence from cigarettes, has it explained why that evidence is relevant to this very different market?

The Department should also consider whether the existing exemption for handmade cigars should be retained, particularly if removing it would create the very risk to specialist tobacconists that Ministers said they intended to avoid. Our point is not that the Impact Assessment must reach a particular conclusion. It is that these questions need to be properly answered before the assessment can provide a sound basis for taking the policy forward. At present, we do not believe they have been.

We would welcome the opportunity to meet with you and colleagues from the Secretariat to explain how specialist tobacconists operate in practice and why the current assessment causes our members such concern.

Yours sincerely,



And the Members of our Association,

<i>Peterson of Dublin</i>	<i>Cigars of Cuba</i>	<i>Johnny's Tobacconist</i>	<i>Surrey Cigars</i>	<i>Essex Cigar Company</i>
<i>The Black Swan Shoppe (Whitby)</i>	<i>Aston's of Manchester</i>	<i>Cigs & Papers</i>	<i>City of London Cigars</i>	<i>Toro Puro</i>
<i>Burkitts (Hove)</i>	<i>Davidoff of London</i>	<i>The Golden Butterfly</i>	<i>Sheppards of Colchester</i>	<i>Noble Ember</i>
<i>John Hollingsworth & Son (Birmingham)</i>	<i>Tobacco Specialists</i>	<i>The Smoking Jacket</i>	<i>Havana House (Windsor)</i>	<i>The Cigar Box Edinburgh</i>
<i>Lands Tobacconists (Stratford)</i>	<i>Segar & Snuff Parlour</i>	<i>Lincoln Watch Clinic</i>	<i>Cask 23</i>	<i>Moka Cigar</i>
<i>Shave & Coster (Reading)</i>	<i>Steven's Tobaccos</i>	<i>Peterson of Dublin</i>	<i>Sip & Smoke</i>	<i>Featherstone Cigar Company</i>
<i>The Bear Shop (Cardiff)</i>	<i>Somerset Tobacco & Spirits</i>	<i>The Old City Cigar Shop</i>	<i>James J. Fox</i>	<i>The Cuban Cigar Club</i>
<i>Frederick Trander (Bath)</i>	<i>The Pipe Shop</i>	<i>Taylor's of Carmarthen</i>	<i>Tobacco Tavern</i>	<i>Turnemus Cigars & Tobacco - Chester</i>

<i>JJ Fox (Harrods)</i>	<i>Farrants</i>	<i>Black Swan (Winkfield)</i>	<i>Churchill's Tobacconists</i>	<i>La Casa Del Habano - Kent'sford</i>
<i>JJ Fox (Selfridges)</i>	<i>Cigars Unlimited</i>	<i>McGahoy The Tobacconist</i>	<i>Holmes Cigars</i>	<i>Turmenus Cigars & Tobacco - Norfolk</i>
<i>Robert Graham 1874 (Cambridge)</i>	<i>Leffords</i>	<i>Smokes-King</i>	<i>Robert Graham 1874</i>	<i>Turmenus Cigars & Whiskey - Liverpool</i>
<i>Robert Graham 1874 (Edinburgh)</i>	<i>Miss Moran</i>	<i>GR Tobaccos</i>	<i>James Barber Tobacconists</i>	<i>Turmenus Cigars & Whiskey - Mayfair</i>
<i>Robert Graham's Global Whiskey Shop</i>	<i>Papernail (North West)</i>	<i>The Black Swan Shoppe (Scarborough)</i>	<i>Thorns Tobacconist</i>	<i>No. 6 Cavendish</i>
<i>Yauings of Barnstable</i>	<i>Hava Hava</i>	<i>Head Case Cigars</i>	<i>Smokers Den & Booze</i>	<i>Bruciani (Carlisle)</i>
<i>Harrison & Simmonds</i>	<i>My Smoking Shop</i>	<i>Mitchells Cigars</i>	<i>Tinsvelli Tobacco</i>	<i>Frederick Tranter (Oxford)</i>
<i>Gruntleys of Nottingham</i>	<i>Smokers Paradise</i>	<i>The Cigar Manor</i>	<i>Castle View Cigars</i>	<i>C. Gars - St James's</i>
	<i>Havana Cigar Exchange</i>	<i>Cigar Nights</i>	<i>The Cigar Holder</i>	