
From: [REDACTED]
Sent: 01 September 2026 16:09
To: 'enquiries@rpc.gov.uk' <enquiries@rpc.gov.uk>
Subject: [REDACTED] DHSC Consultation Stage IA on standardised packaging

Dear [REDACTED]

I am writing to you to provide evidence from my company, Tor Imports Ltd, a UK importer of Other Tobacco Products, regarding the DHSC Consultation- stage Impact Assessment (IA) on standardised packaging (SP) and combined picture warnings.

The current AI relies completely on cigarette evidence, omits category specific feasibility analysis, understates impacts on specialist importers and retailers, and does not adequately assess supplier and product withdrawal, illicit trade, waste, or consumer displacement. This document is to support RPC's scrutiny by presenting clear, proportionate and category-specific evidence, consistent with parliamentary assurances that handmade cigars and other OTP's must be assessed separately.

I would welcome the opportunity to meet with the RPC and discuss this is document and OTPs in greater depth and will even offer a visit to our bespoke facilities in Devon for the Committee, or a representative of RPC to gain a greater understanding of the points raised in the document.

I remain at your disposal should you require further clarification on any point.

Yours sincerely

[REDACTED]
[REDACTED]
[REDACTED]

www.tor-imports.co.uk



Executive summary:

Tor Imports asks RPC to require DHSC to produce a category-specific Impact Assessment for imported Other Tobacco Products (OTP) before any standardised-packaging proposals advance. The current IA relies on cigarette evidence as a proxy, does not assess the operational feasibility of repacking handmade cigars, pipe tobacco and cigarillos, and does not adequately consider the consequences for specialist importers, artisanal overseas suppliers, specialist tobacconists, legitimate tax receipts, environmental waste or illicit trade.

1. Introduction and Purpose of the critique

This document provides evidence from Tor Imports, a UK specialist importer of Other Tobacco Products (OTPs) based in Devon, regarding the DHSC Consultation-Stage Impact Assessment (IA) on standardised packaging (SP) and combined picture warnings.

Our objective is to support RPC's scrutiny by showing why imported OTPs require a category-specific assessment before any standardised-packaging requirements are advanced. The evidence below explains how handmade cigars, pipe tobacco and cigarillos differ from mass-market cigarettes in production, packaging, consumer behaviour, supply-chain structure and operational feasibility.

Tor has traded as an OTP importer and distributor since 1992, operating from an HMRC-approved Customs & Excise bonded warehouse within a specialist temperature- and humidity-controlled facility that maintains handmade cigars in optimal condition.

We employ 18 members of staff.

Tor trades 100% business-to-business, supplying specialist tobacconists and premium retail channels across all four countries of the UK. We do not supply supermarkets or convenience stores, and we do not make online consumer sales.

Our product range consists of handmade cigars, pipe tobacco and cigarillos. We do not sell cigarettes, hand-rolling tobacco or vaping products.

We consider ourselves a niche business, with sales in the last financial year of [REDACTED] and a tax contribution, including tobacco duty, [REDACTED], representing almost 60% of our turnover.

Tor's share of annual UK tobacco duty is around 0.02%, yet we account for almost 20% of all combustible tobacco products registered for sale in the UK. This indicates the number of low-volume specialist product lines; we carry, around 650 SKUs, with handmade cigars alone available in 334 different box sizes and 34 different formats containing a mixture of 3, 5, 6, 10, 16, 20, 25, 40 and 100 cigars.

2. Category-Specific Nature of OTPs Imported

The IA does not currently identify or assess OTPs separately, despite Parliament requiring category-specific analysis. That omission matters because OTPs differ from cigarettes not only in consumer profile, but also in manufacturing scale, packaging format, storage requirements, import handling and specialist retail channels.

This is particularly concerning given Minister Merron's assurance from the dispatch box that SP regulations would not close specialist tobacconists or specialist tobacco importers. The IA provides no evidence to support that assurance. Baroness Merron stated from the dispatch box:

"I can say, as I have said before, 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. Our intent is that any future packaging regulations make the health harms of these products clear while minimising the impact on businesses."

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"The policy proposals for any packaging requirements will be a matter for consultation, and all businesses—including, I am sure, specialist tobacconists—will want to respond and will be welcome to."

"The Government do not intend to remove this [sampling lounge] existing exemption for specialist tobacconists. The consultation explicitly states our intention for the exemption to remain"

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"In England, this allows specialist tobacconists to display tobacco products as long as they are not visible from outside the premises. The Government's intention is not to remove this existing exemption for specialist tobacconists."

Other Tobacco Products (OTPs), particularly handmade cigars and pipe tobacco, differ from the mass market for cigarettes and hand-rolling tobacco in almost every respect. An artisan roller may make 100–120 handmade cigars per day, whereas millions of cigarettes and packs of hand-rolling tobacco can be produced in an automated factory each day.

All pipe tobacco is hand-packed to the correct weight before product lids are sealed to keep the tobacco fresh, while machine-made cigar production lines run at only 100–200 units per hour.

The consumer demographic for OTPs is 90–97% over 25, and these products have no history of being entry products for youth smoking. The luxury, connoisseur consumer base for handmade cigars is older and well informed, and seeks variety, provenance and heritage. Consumption patterns are closer to wine and malt whisky than to cigarettes: one or two cigars a week rather than 20 cigarettes a day.

Our suppliers use varied packaging formats, including wooden boxes, tubes, tins and jars.

Cigars arrive at our Customs bond packed primarily in cedar boxes packed by the manufacturer to their global specifications; there are no market-specific products.

This protective packaging comes in hundreds of shapes and sizes, including boxes, packs, jars and tubes, with no UK-specific labelling in place. All cigars are stored in controlled conditions of 70% humidity and 18°C to prevent them from drying out or becoming too moist.

Regardless of the global destination market, all boxes exported by manufacturers in Central America and the Caribbean look identical, and would normally carry a governance seal, to provide evidence of the quality and country of origin where they are produced. It therefore becomes the responsibility of the importer in each country to ensure that each box complies with local health warning and HMRC Track & Trace labelling requirements.

In Tor's case, we first attach the correctly sized health warning labels to each box and tube, using 14 rotating messages, followed by the placement of Track & Trace codes, including aggregate codes for outers and cases. All of this is done manually.

Tor applied approximately 270,000 labels in the last year, all by hand in our warehouse.

Mechanisation of this process is not commercially possible given the wide variety of box sizes and small quantities involved. Preparing for Track & Trace, which comes into effect in March 2027, has cost the company a six-figure investment, in addition to an additional new, ongoing cost of labelling each box of approximately £1.50

If standardised packaging is introduced, it will not be commercially viable to carry such a wide range of products. The complexity and variability of these products, coupled with a supply chain dominated by small family-owned suppliers, importers and specialist retailers with limited resources and labour-intensive manual production processes, make it impossible to apply standardised pack formats across all our products.

The next illustration shows a sample of 42 cigar boxes from different manufacturers, alongside 5 uniform cigarette packs and 2 packs of hand-rolling tobacco, both of which are mass-produced in one standard size for each category.



Cigars don't have a standard size or count per box. therefore, cigar boxes are not standard.

Cigarette sizes are standardised. Therefore, cigarette packaging is standard.

Each cigar may be available in more than one shape



This chart demonstrates that there are least 32 basic cigar shapes, available in 7 different tobacco wrappers, and in multiples of different pack and box counts of 3, 5, 6, 10, 16, 20, 25, 40 and 100 cigars.

No attempt has been made in the IA to understand the full impact of standardised packaging on adult-only OTPs with distinct packaging formats, specific storage requirements and different consumption patterns. These characteristics materially differ from cigarettes and must be assessed separately.

3. Evidence Gaps and Methodological Issues in the IA

This section provides the quantified importer evidence RPC will need to test whether the IA's cost assumptions are realistic for imported OTPs. For Tor, the key impacts are the loss of viable product range, new repackaging and packaging costs, disruption to Track & Trace compliance, additional labour and storage requirements, and reduced ability to trade profitably.

The central methodological problem is that the entire Impact Assessment relies on cigarette evidence as a proxy for OTPs. That approach cannot support accurate conclusions for handmade cigars, pipe tobacco or cigarillos, because these products differ materially in packaging, consumer base, production scale and supply-chain structure.

While we understand concerns around health and tobacco, it is important to note that the prevalence of OTP use, including cigar consumption, is very low. Indeed, the

prevalence of OTP use among the UK population is so limited that neither DHSC nor the Office for National Statistics currently tracks the incidence of OTP use.

In a 2023 DHSC (OHID) consultation on mandating quit messages inside tobacco packs, under “Option 5: make it a legal requirement to include pack inserts in all tobacco products”, DHSC stated: **“It has not been possible to estimate the costs and benefits associated with these niche forms of tobacco due to limited data available on the prevalence and consumption of these products.”**

Without data on the specific effectiveness of standardised packaging for OTPs, applying this policy to the category is akin to the proverbial “hammer to crack a nut”.

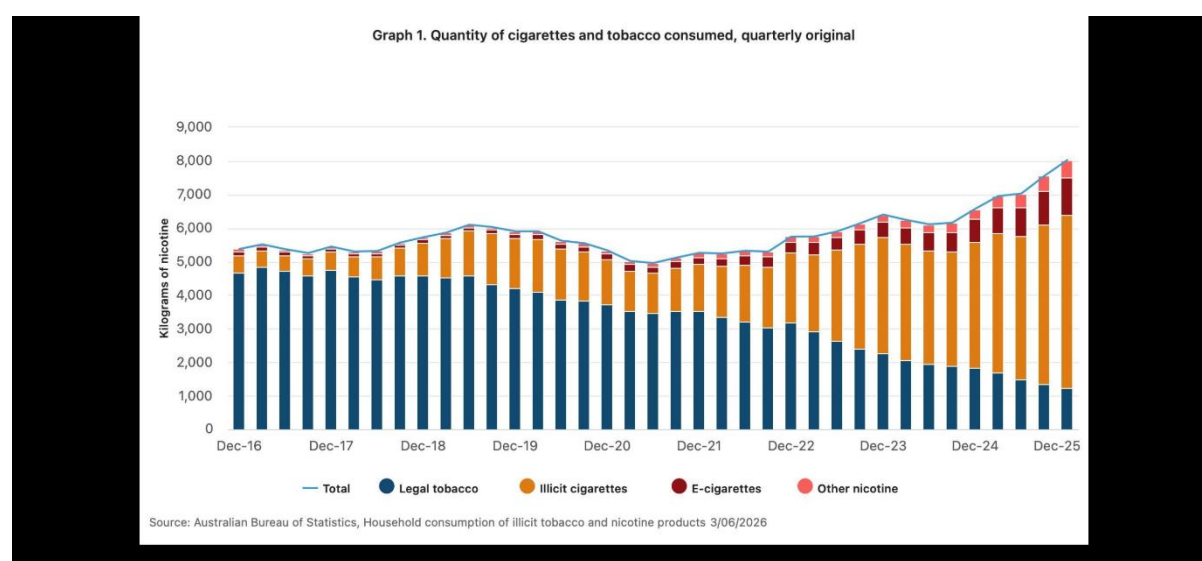
The impact of such regulatory overreach is effectively to condemn an entire legal industry by imposing unworkable requirements. We advocate a balanced approach that reflects the unique characteristics of OTPs and the potential negative impacts on SME companies, our specialist customers, their consumers and the local economy we support.

The entire Impact Assessment relies on cigarette evidence as a proxy.

The Impact Assessment contains no behavioural evidence for picture warnings on handmade cigars or pipe tobacco, and no assessment of packaging diversity or technical feasibility for imported goods.

Recent international exemptions for OTPs from standardised packaging have not been considered in the IA, including those in France, Denmark, Norway, Slovenia and Hungary.

A small number of markets have introduced standardisation for all tobacco products. Recent data from the Australian Bureau of Statistics, dated 3 June 2026, highlight the unintended consequence of driving the legal tobacco market towards illicit trade across all tobacco categories.



4. Economic and Operational Impacts on Importers

Of the c650 OTP SKU's imported by Tor, only 76 make up 80% of the total volume (Parato theory), putting 88% of our lines at risk.

As detailed in Section2, all OTPs arrive in our warehouse in their global branded packaging. Manufacturers will not produce UK-specific standard packaging because the volumes are too low.

On receipt of the goods, Tor would need to repack all products into standardised packaging and replace the bands on each cigar. All of this would be done manually. We are currently unclear what impact this would have on the new Track & Trace legislation that comes into force in March 2027, including any unintended costs for that process.

All existing boxes and bands would need to be discarded and would become waste. The cost of these boxes is approximately 20% of the product cost we pay to manufacturers.

It would be the importer's responsibility to fund all standardised packaging, meaning that standard packs and bands would be a new cost for Tor. To achieve economies of scale on the cost of new standardised packaging, very high quantities would need to be purchased. We therefore forecast a substantial capital outlay that not all specialist importers would be able to fund.

It is reasonable to expect these costs to be close to the cost of existing boxes and bands, at approximately 20% of product cost.

In addition, we would need to redesign our temperature- and humidity-controlled humidor to accommodate a significant repacking production line, at further cost. It is also likely that we would need to increase staffing levels to carry out manual repacking.

Taken together, these changes would eradicate our margin and hinder our ability to trade profitably. This would negatively affect the range we import and the number of staff we employ.

Cigarette producers benefit from packs of the same size, produced in millions by automated machinery every day. Handmade cigars are the polar opposite: all handmade cigars are artisanal products, with manufacturing lead times ranging from 5 to 15 months, meaning we already hold approximately one year's stock at any given time.

Assuming SP drives reductions in product ranges, one implication may be that manufacturers withdraw from the UK market if they have only a limited number of

SKUs with a viable sell-through rate. Alternatively, importers may have to buy in bulk, for example two years' stock, to justify the cost of shipping a smaller portfolio.

Standardised packaging will ultimately act as a barrier to entry for new suppliers and for new products and penalise the legal specialist tobacco importer and retailer.

Consumers will still seek their preferred products. As demonstrated by the Australian findings, the currently non-existent illicit trade in cigars in the UK could become an open door for the illegal market.

In summary, the IA's generic cost assumptions do not reflect the realities of importing OTPs. For our business, the proposed measures would result in reduced turnover, reduced margins due to increased complexity and costs, reduced tax contributions, and increased government costs to police illicit trade.

5. Impact on International Suppliers and Artisanal Manufacturers

Artisanal handmade cigar factories are primarily family-owned businesses in Central America and the Caribbean. Many are operated by fourth- or fifth-generation family members, employ around 400,000 staff, and have exported to the UK as trade partners for decades.

In a global cigar context, the UK is a very small market by volume but a prestigious one, associated historically with figures such as Sir Winston Churchill.

The IA assumes that manufacturers can simply switch to UK-specific plain packaging, but this assumption does not reflect the economics or production methods of artisanal cigar factories. For low-volume UK orders, the cost of designing, producing and managing separate plain-packaging runs would be commercially disproportionate and operationally impractical.

From planting the seed in the ground to placing the finished cigar in a cedar box ready for shipping can take up to five years of care and attention.

As a result, many small manufacturers would be forced to withdraw their products from the UK entirely. This would not only eliminate niche cigar SKUs from the UK market but would also damage bilateral trading relationships with Caribbean nations whose economies rely on premium cigar exports as part of their cultural and economic heritage.

The IA does not acknowledge these international economic consequences, nor the diplomatic implications of undermining trade with partner countries whose artisanal industries cannot comply with SP requirements.

Many manufacturers have their own box-making factories on site, primarily using cedar wood because it is the standard material for regulating moisture, enhancing tobacco aroma and naturally repelling pests. This is particularly important when exporting from hot, humid countries to colder countries such as the UK, to ensure that cigars are not damaged in transit.

Handmade cigar packaging is not merely promotional decoration. It communicates essential information to adult consumers, retailers, importers and distributors, including brand, factory, manufacturer, country of origin, tobacco origin, blend, size, vitola, production method, ageing, limited-release status, authenticity, quality checks and provenance guarantee seals.

Some handmade cigars are supplied in metal tubes. These are individual, crush-proof containers designed to protect and transport single cigars. Typically made from aluminium or stainless steel, they contain a thin sleeve of Spanish cedar that acts as a micro-humidor, regulating moisture and protecting the cigar.

In summary, many of our suppliers are small, artisanal, family-owned manufacturers whose production methods are incompatible with UK-specific plain packaging. The UK's small market share provides no commercial justification for the required investment, meaning withdrawal is the most likely outcome.

International practice further demonstrates that OTPs are commonly treated differently from cigarettes where regulators recognise their distinct market, production and consumer characteristics.

Following litigation in *Cigar Association of America et al. v. FDA et al.*, the U.S. District Court for the District of Columbia vacated FDA's OTP warning requirements, meaning OTPs are not currently subject to the FDA warning statement requirements that had been adopted through the Deeming Rule. Since 2020, OTPs have operated under a differentiated regulatory framework, and available youth-use data does not show a resulting increase in youth cigar use.

France, Denmark, Norway, Slovenia, Hungary and Luxembourg exempt cigars and pipe tobacco from their SP regulations.

6. Specialist Tobacconist Supply Chain Impacts

The operational consequences for importers would flow directly through to specialist retailers. If importers are forced to reduce ranges or withdraw low-volume SKUs, specialist tobacconists would lose the product breadth and provenance information on which their business model depends.

Tor's business model is 100% business-to-Business, it depends on supplying specialist tobacconists and premium retail channels across all four countries of the UK, rather than supermarkets, convenience stores or direct online consumer sales. That means any reduction in imported OTP range would be felt most acutely by specialist retailers whose offer is built around provenance, variety and adult consumer choice.

We already operate lawfully within strict regulations, including the Tobacco and Related Products Regulations 2016.

SP will threaten all parts of the supply chain, with mature consumers denied choice by regulation. In particular, the loss of smaller specialist products would remove specialist retailers' main competitive advantage.

These stores are overwhelmingly family-owned and operated. It is unclear how such stores can survive if manufacturers and distributors such as Tor have to implement SP. The flexibility for stores to order small quantities will be lost, and variety will reduce significantly, such that specialist stores will no longer be able to offer a differentiated product range to their customers.

Evidence from France since the introduction of SP for cigarettes, shows that the bigger brands will get bigger, and smaller brands will disappear.

The IA does not distinguish specialist tobacconists from general tobacco retailers and instead relies on the broad industrial classification SIC 47.26. This approach does not reflect the statutory definition of a "specialist tobacconist" set out in Regulation 2(1) of the Tobacco and Related Products Regulations 2016, which requires that more than half of a retailer's sales consist of tobacco products other than cigarettes. Given the nature of the TRPR 2016 threshold, it is extremely difficult for specialist retailers to diversify without losing this special status.

By using SIC codes rather than the legal definition, the IA materially overstates the number of specialist tobacconists and understates the concentrated exposure faced by the small number of retailers whose turnover is genuinely dominated by OTPs. This misclassification affects the SaMBA, the economic impact assessment, and the identification of businesses most at risk from SKU withdrawal and supply-chain disruption.

In summary, specialist tobacconists rely heavily on imported OTPs. SKU withdrawal and loss of provenance would have disproportionate impacts on these retailers, many of whom derive the majority of their turnover from OTPs.

7. Impact on Tourism, Hospitality and the Vintage/Collector Market

The same loss of provenance would also affect tourism, hospitality and the UK's established vintage and collector markets. Premium handmade cigars form part of the offer in high-end hotels, restaurants, specialist sampling lounges and heritage venues that cater to international visitors.

Standardised packaging would remove provenance features that are integral to product authenticity, diminishing the appeal of premium cigar experiences within the UK's tourism and leisure sectors. In addition, the UK has a longstanding collector and vintage market for aged cigars and limited-edition releases, where branded packaging, factory codes and artisanal presentation are essential to valuation, authenticity and trade.

Plain packaging would significantly reduce the viability of this market and risk diverting collectors and high-value purchases to overseas jurisdictions where

branded boxes remain legal. These impacts are not considered in the IA but represent meaningful losses to associated services and cultural-heritage markets.

Handmade cigars, for example, are culturally significant products in many partner countries, representing heritage craftsmanship and national identity in a similar way to gin, cider or whisky.

8. Illicit Trade, Provenance and Consumer Displacement

Reduced lawful supply would also increase the risk of consumer displacement into overseas, counterfeit or illicit channels. This is currently a non-existent issue for handmade cigars in the UK, but standardised packaging could create new incentives for illegal supply if legitimate importers are forced to reduce range or exit product lines.

This is now an issue in Australia (see chart on page 5). On 27 November 2025, the Australian Parliament established an inquiry into the “Illegal Tobacco Crisis in Australia”. (Report published on 28th August 2026)

Tor places a security seal and UID sticker on each box of cigars in line with Track & Trace regulations, as well as a seal of origin and guarantee confirming that every box leaving our warehouse has been imported and labelled in compliance with UK statutes, stored and humidified to the highest standards, and inspected again before being dispatched to the retailer.

If SP reduces the ranges available in the UK, it is reasonable to expect UK consumers to seek their preferred brands in non-UK markets, thereby reducing UK tax receipts.

The IA briefly acknowledges that SP may cause disproportionate harm to specialist tobacconists, but the proposed mitigations, such as extended lead-in times, stakeholder engagement and clear regulations, are superficial and ineffective.

9. Environmental and Waste Implications for Importers

The environmental impact is not incidental to the economic impact. Repacking would require compliant importers to remove and discard packaging that has already been produced for legitimate goods, while also purchasing replacement packaging solely to satisfy UK-specific presentation rules.

No consideration has been given to the cost of disposing of existing OTP-style packaging stock held in UK warehouses, or to the future disposal of empty boxes discarded before repacking into SP.

No consideration has been given to the additional storage space and repacking areas that each importer would need to create in their facilities.

10. Procedural Fairness and Consultation Quality

We welcome proportionate regulation. However, the consultation process has limited importers' ability to provide evidence that is essential for an accurate IA.

Throughout the legislative process on the Tobacco & Vapes Bill, of which this consultation now forms part, stakeholder engagement has not occurred in practice. The Government is using Article 5.3 of the WHO/FCTC to avoid engagement. The DHSC acknowledges that it has no data despite companies such as Tor having proactively and repeatedly responded to consultations and providing detailed information from inside the niche OTP sector.

This matters because a consultation process cannot produce a reliable assessment if category-specific evidence from affected importers is received but not meaningfully analysed.

11. Recommendations to RPC

We recommend that RPC ask DHSC to take the following steps before the IA is treated as fit for purpose:

- Require DHSC to produce category-specific analysis for imported OTPs.
- Commission independent research on OTP prevalence and behavioural impacts.
- Reassess economic modelling using realistic importer and supplier data.
- Conduct feasibility assessments for the diverse packaging formats used internationally and the unintended consequences of applying SP to them.
- Consider international regulatory practice and exemptions.
- Ensure meaningful engagement with importers and overseas manufacturers.

We respectfully recommend that RPC request a category-specific IA for OTPs before any regulatory proposals advance, ensuring proportionality and alignment with parliamentary intent.

12. Conclusion

We support evidence-based, proportionate regulation. However, the current IA does not provide a reliable basis for assessing imported OTPs because it relies on cigarette evidence, omits category-specific feasibility analysis, understates impacts on specialist importers and retailers, and does not adequately assess supplier withdrawal, illicit trade, waste or consumer displacement. It should therefore not be rated fit for purpose until those issues are addressed.

We hope this critique assists RPC in its scrutiny and contributes to a more accurate, category-specific final IA.

We offer the opportunity for the RPC to visit our bespoke facilities in Devon to see at first hand the manual process that goes into ensuring that all Other Tobacco Products leaving the Tor warehousing is 100% legal and compliant will all DHSC and HMRC regulations, and how difficult it will be to achieve SP on this category of products.

OTP differences - Summary

Process and Procedure	Cigars	Cigarettes & RYO
Import and manufacture	Small family-owned manufacturers, small family-owned UK distributors that import cigars into the UK (4-50 employees).	Large multinational corporations with subsidiary companies based in each market (000s of employees).
Product	100's of varied sizes and gauges.	Homogeneous product.
Product	All products arriving in the UK must be manually labelled with health warnings to ensure compliance with UK market requirements.	UK-specific products are produced, labelled as part of automated production (Printed Health Warnings).
Packaging	Sold in different quantities according to product dimensions (e.g., 6s, 8s, 10s, 20s, 24s & 100's).	Sold in packs of 20 (Cigarettes) or by weight, usually in pouches (RYO)
Packaging	Cedar boxes to prevent insect damage and to optimise humidity (preventing mould on a natural product).	Cardboard packs or plastic wrapped pouches.
Storage	Specialised humification and temperature control throughout the supply chain at 70% and 18 degrees.	Ambient bulk storage.
Labelling	Manual (by hand) processes across small volumes.	Automated process across large volumes.
Retail	Specialist family-run stores are legally defined by the minimum percentage of turnover derived from *OTP .	The majority are sold via national grocery or convenience multiple chains.
Retail	Sell-out is often slow - can be over a number of years (*SMCG) as the product matures.	Fast throughput via high street measured in weeks (*FMCG).



Tor Imports Ltd
The Old Quarry
Caton Cross
Ashburton Devon
TQ13 7LH

1st September 2026

From: [REDACTED]
Sent: Monday, September 07, 2026 16:58
To: RPC Enquiries <enquiries@rpc.gov.uk>
Subject: FW: [REDACTED] DHSC Consultation Stage IA on standardised packaging

Dear [REDACTED]

As follow up to the document I sent to you last week on 1st September, I wish to add the following.

In reference to the DHSC Consultation that is currently going on, please find an example of the type of 'misinformed' information that is circulating in the public domain, which is why it is critical that the Impact Assessment for OTPs is accurate to avoid bad legislation with severe unintended consequences.

This clip is directly from the ASH website at the end of last week. <https://ash.org.uk/campaigns/the-tobacco-and-vapes-bill/have-your-say-on-tobacco-and-vape-packaging-appearance-and-display>

Links of the week

Respond to the consultation on tobacco and vape packaging and display

The UK and devolved governments are currently consulting on further restricting the promotion of vapes, nicotine and tobacco products to protect young people. **However, the industry is fighting back.** Cigar and vape manufacturers are campaigning hard against the proposals – the cigar **campaign** claims to have elicited over 1,700 responses already. **This risks skewing the consultation responses and could put the proposals at risk.** We need a strong response from public health professionals, members of the public and young people to demonstrate the overwhelming public support for the proposals.

ASH is calling on everyone in the public health community to submit a supportive response to the consultation and encourage colleagues to do so. It only takes 5 mins to respond. We've created a short guide to help people respond [here](#). The consultation closes at midnight on the 2nd October.

[Click here to respond](#)



The small pack on the left is a pack of 'under 3 grams' cigarillos.

Cigarillos is a separate tobacco category, separately defined in the 2016 Tobacco Act and currently benefits from the same exemptions as all OTP products, whereas Handmade cigars are a completely different definition.

However, under the Tobacco & Vapes Bill, all the individual categories have been removed and are now all classed as 'other tobacco products', meaning all tobacco products from cigarettes to handmade cigars to vape will be treated the same.

ASH are claiming on their website "Cigarette-like cigarillos are classified as cigars, meaning they can be sold in smaller packs, with striking advertising, flavours and at lower prices. Tobacco companies have exploited this loophole to get around restrictions on cigarettes and continue marketing tobacco products to young people"

To be clear, Cigarillos are machine made cigars. They are primarily sold in Supermarkets and Convenience Stores behind closed shutters and are highly unlikely to be sold in a specialist tobacconist. They bear absolutely no similarity to an artisanal handmade cigar other than having the word 'cigar' in its name of 'cigarillo'; it's even unlikely to have a natural tobacco leaf wrapper.

This is a clear example where our inability to communicate with the Government during the Tobacco & Vapes consultation process means that the Impact Assessment lacks category-specific evidence, which is inconsistent with parliamentary assurances that handmade cigars and other OTP's must be assessed separately.

I remain at your disposal should you require further clarification on any point.

Yours sincerely,

[REDACTED]