



Department
of Health



Llywodraeth Cymru
Welsh Government



The Scottish
Government
Riaghaltas na h-Alba



Department of
**Health, Social Services
and Public Safety**
www.dhsspsni.gov.uk

Consultation on the introduction of regulations for standardised packaging of tobacco products – Response Form

a. Are you responding (required):

- As a member of the public (go to question b)
- As a health or social care professional (go to question b)
- On behalf of a business or as a sole trader (go to question c)
- On behalf of an organisation (go to question c)

b. Please provide your details and contact information:

Name of respondent (required)

Address of respondent (required):

Contact email address (required):

Now go to question f

c. Please provide your organisation's details and contact information:

Name of organisation (required):

Name of person providing submission (required):

Dr A D Dwarakanath FRCP Edin

Job Title (required):

Secretary, Royal College of Physicians of Edinburgh

Contact address of organisation (required):

9 Queen Street, Edinburgh EH2 1JQ

Contact email address (required):

l.lockhart@rcpe.ac.uk

Is this the official response of your organisation? (required):

Yes

No

d. If you are responding on behalf of a business, what type is it?

Tobacco retailer (supermarket)

Tobacco retailer (convenience store)

Tobacco retailer (other type of shop or business)

Specialist tobacconist

Duty free shop

- Wholesale tobacco seller
- Tobacco manufacturer
- Retailer not selling tobacco products
- Pharmaceutical industry
- Business involved in the design or manufacture of packaging
- Other (please provide details below)

If other, please tell us the type of business:

e. If you are responding on behalf of an organisation, what type is it?

- NHS organisation
- Health charity/NGO (working at national level)
- Local Authority
- Local Authority Trading Standards or Regulatory Services Department
- Local tobacco control alliance
- Retail representative organisation
- Industry representative organisation
- Other type of business representative organisation
- University or research organisation
- Other (please provide details below)

If other, please tell us the type of organisation:

Medical Royal College

f. Does your response relate to (required):

United Kingdom

England only

Scotland only

Wales only

Northern Ireland only

g. Do you, or the business or organisation you represent, have any direct or indirect links to, or receive funding from the tobacco industry? (required)

No

Yes (please describe below)

If yes, please describe:

h. If you do not wish your details to be identified in the summary report of consultation responses, please tick this box

Consultation questions

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

The Royal College of Physicians of Edinburgh (“the College”) has Fellows and Members across the UK and overseas, with 50% of our UK fellows and members working in the NHS in England, and is pleased to respond to the call for comments on the introduction of regulations for standardised packaging of tobacco products.

Our Members and Fellows are responsible for the diagnosis and treatment of most of the diseases caused by smoking, including heart disease; chronic obstructive pulmonary disease; cancer of the lung and many other organs. We are all too well aware that half of all regular smokers will die prematurely of such diseases and that smoking is commonly initiated in childhood and proves to be addictive. The College is committed to support initiatives which will reduce the uptake of tobacco smoking, particularly in the young.

We regard the Chantler Review as an excellent summary of the problem and available evidence. Our only concern is that representatives of the Tobacco Industry were involved in the Review, which is not in accord with the World Health Organisation Article 5.3 of the Framework Convention on Tobacco Control, to which the UK is a signatory, which stated that the Tobacco Industry should have no place in influencing public health policy. Over the last 50 years the tobacco industry has a poor record of denying the scientific evidence of harm from tobacco smoking, and opposing many measures designed to improve public health.

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?

The Royal College of Physicians of Edinburgh is a member of the Scottish Coalition on Tobacco (SCOT) which is responding to this consultation, and which has undertaken a detailed review of the latest evidence emerging recently from Australia, showing that many of the objections to standardized packaging from the tobacco industry are ill-founded. There is no evidence of a lasting impact on serving times in small retailers, the packs are less attractive to smokers, and give rise to increasing calls to phone lines providing quitting advice. There is no evidence of increased smuggling of tobacco, and yet early evidence of a decline of tobacco consumption, more marked among teenagers. We shall not reiterate here the detailed evidence from the SCOT response.

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?

We support the draft regulations, but regret that they do not fully prevent future promotional activity of this lethal material by not regulating all forms of tobacco products, not just cigarettes and hand-rolling tobacco, nor do they prevent other promotional gimmicks such as different shapes, sizes and pack sizes of cigarettes and tobacco. We support the suggestion that all packs should contain 20 cigarettes and be the same size. The industry are adept at devising new forms of their products, and making them appealing to specific groups such as young people.

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?

We do not believe that there is any evidence to support the view that illicit tobacco use will increase as a result of the introduction of standardized packaging, and this is being confirmed by emerging evidence from Australia.

The Royal College of Physicians of Edinburgh is fully aware of the continuing and appalling health consequences of tobacco use resulting in ill-health, immense suffering, and premature death. The College is also all too aware of the magnitude of the problem. Tobacco products can no longer be regarded as normal consumer products – they have no beneficial effects, apart from giving relief to those with already established nicotine addiction, and cause major ill-health and death. We must undertake all measures to reduce the numbers of young people attracted to the use of tobacco, and we believe that standardized packaging would be a significant step in reducing the appeal of tobacco products to children and young people.

Thank you for participating in this consultation.

The Department of Health and Devolved Administrations will only contact you should we seek further information about your response.

How to get involved in the consultation

The consultation will run for 6 weeks, from 26/06/14 to 07/08/14. Responses are invited from any interested group, company or person.

Respondents are encouraged to provide their views online, but responses can be made in any of the following ways:

Completing the online form on the Department of Health website at:

<http://consultations.dh.gov.uk/tobacco/standardised-packaging-of-tobacco-products-1>

- **Filling in the response form by downloading it at:**

<https://www.gov.uk/government/consultations>

- **Emailing your response to:**

TobaccoPackaging@dh.gsi.gov.uk

- **Posting your response to**

Department of Health
Standardised Packaging Tobacco Consultation
PO Box 1126
CANTERBURY
CT1 9NB