15 March 2018

Ministry of Health
16 College Road
College of Medicine Building
Singapore 169854

Attention: **Director, Epidemiology and Disease Control Division**

Re: Public Consultation on Proposal to Introduce Standardised Packaging of Tobacco Products in Singapore, 5 February to 16 March 2018

1 We refer to the Ministry of Health's invitation to participate in the abovementioned public consultation.

2 Attached herewith are the comprehensive views of Japan Tobacco International with regards to the Singapore Proposal to introduce standardized packaging on tobacco products.

3 In addition, and before the Singapore Government makes any final decision on whether to proceed with this Proposal, we would like to reiterate that it should spend more time to reconsider the following points:

(i) The Singapore Government should take into consideration the data and evidence from Australia that clearly demonstrate that the standardized packaging experiment has not worked there in the more than 5 years since its introduction

(ii) Rather, the Singapore Government should closely study the undesirable impact it has had in Australia in terms of negatively affecting local businesses and worsening the local illicit tobacco trade situation

(iii) The Singapore Government should also closely study the impact standardized packaging has had in other countries like the UK and France where the data emerging from the early stages of its implementation there is no different from what the situation in Australia is

(iv) The Singapore Government should await the final outcome of the ongoing WTO dispute between Australia and 4 claimant countries, as well as after the WTO appeal process is exhausted before making any final decision on this Proposal

(v) The Singapore Government should conduct an appropriate assessment of the effectiveness of recently-introduced tobacco control measures - such as the point of sale display ban, the upcoming progressive increase of minimum legal age for smoking and more smoking restrictions in public places - in reducing smoking incidence in Singapore before any decision to progress standardised packaging is made

(vi) The Singapore Government should conduct comprehensive face-to-face meetings with relevant trade associations and tobacco retailers to better understand their various business and operational concerns over the potential implementation of standardized packaging

4 I can be contacted at my email julia.gough@jti.com or at +65-6378-7978 if you require any further information from our company.

Thank you and best regards,

Julia Gough
General Manager
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(Enclosed: JTI's submission dated 15 March 2018)

CC

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