From: reginst@posteo.net <reginst@posteo.net>
Sent: Friday, 16 March 2018 7:18 AM
To: MOH Tobacco Control (MOH) <Tobacco_Control@moh.gov.sg>
Subject: Regulatory Institute: Article on Tobacco Control Regulation

Dear Director of Epidemiology and Disease Control Division

The Regulatory Institute is pleased to advise it will soon publish its article on Tobacco Control Regulation on its site at www.howtoregulate.org by 26 March 2018. We regret that it was not possible to publish the article today to coincide with the deadline of the Singaporean public consultation on the SP Proposal. Nevertheless, we wish to raise a few points to be considered now in your current public consultation (see our response below to your specific consultation questions) and in 10 days time, when our article will be published, we hope you will consult the published article.

The Regulatory Institute is an independent, not-for-profit organisation, assisting the improvement of regulation in different jurisdictions by providing support to individuals in charge of or interested in developing regulation. The Regulatory Institute collects methodological knowledge through comprehensive research of regulatory techniques used in many different sectors and by many different jurisdictions in different parts of the world. The Regulatory Institute makes applied methodological knowledge accessible for free through its website at www.howtoregulate.org. As far as possible, it can also assist in responding to specific research requests. The Regulatory Institute applies a transcontinental and trans-sector approach and can act as a knowledge broker for regulators. It exerts this role for the benefit of all in so far as we all are subject to regulation.

Our soon to be published article on Tobacco Control Regulation examines a number of national tobacco control regulations according to the obligations laid out in the Framework Convention on Tobacco Control. We believe that by examining some of the world´s good regulatory practice for tobacco control and making suggestions for other regulatory techniques not yet considered, can strengthen worldwide tobacco controls and thereby improve public health. I note that Singapore intends to develop other tobacco control measures such as increased taxation and public education, which is also covered in our soon to be published article.

I disclose that the Regulatory Institute has no direct or indirect links to, nor do we receive funding from, the tobacco industry. I also disclose that as an individual I have no direct or indirect links to, nor do I receive funding from, the tobacco industry.

All the best in the evolution of your SP Proposal and any questions or comments you would like to provide about our article on Tobacco Control Regulation would be welcomed.

Regards

Valerie Thomas
Manager
Regulatory Institute
Brussels and Lisbon

1. Do you agree that the SP Proposal would contribute to reducing smoking prevalence and improving public health over and above existing tobacco control measures? Please cite any relevant studies (specifically, the particular page or part of these studies) or information that support or contradict this.

The Public Consultation Paper on Proposed Tobacco Control Measures in Singapore prepared by the Ministry of Health, has examined in great detail the Australian experience with plain packaging and the associated research showing its effectiveness in reducing the prevalence of smoking. These strong results have encouraged other jurisdictions (the UK, Ireland and France) to implement similar plain packaging regulation.
Based on the research made in developing our soon to be published article on Tobacco Control Regulation we agree that the SP Proposal would contribute to reducing smoking prevalence.

2. Do you agree that the SP Proposal has the potential to achieve one or more of the five objectives set out above? Please cite any relevant studies (specifically, the particular page or part of these studies) or information that support or contradict this. (Please specify which of the above objective(s) you think the SP Proposal may achieve.)

Again the Australian experience has showed results in all 5 objectives on page 46 of the Public Consultation Paper on Proposed Tobacco Control Measures in Singapore.

3. Do you have any suggestion(s) to improve the SP Proposal measure under consideration as set out in Part 3.3.3 of this document? Please cite any relevant studies (specifically, the particular page or part of these studies) or information that support your suggestion(s).

None.

4. If you do not support the proposal to introduce the SP Proposal, do you have any suggestions to regulate the shape, size and look of tobacco products and packaging to achieve the objectives set out above? Please cite any relevant studies (specifically, the particular page or part of these studies) or information that support your suggestion(s).

No comment.

5. If you do not agree that the SP Proposal should be introduced, what other options do you think should be adopted to reduce smoking prevalence, and the harm it causes? Please cite any relevant studies (specifically, the particular page or part of these studies) or information that support your suggestion(s).

We do agree that the SP Proposal should be introduced particularly as it is world´s best practice for packaging and labelling, however, Singapore should give some consideration to regulation of the contents of tobacco products, particularly levels of nicotine. The US Food and Drug Administration has recently started a public dialogue about lowering nicotine levels in combustible cigarettes to non-addictive levels through achievable product standards (see here https://www.fda.gov/TobaccoProducts/NewsEvents/ucm568425.htm).

6. If adopted, do you agree that the SP Proposal should be applied to non-cigarette tobacco products such as cigarillos, cigars, ang hoon, and roll-your-own tobacco? Please cite any relevant studies (specifically, the particular page or part of these studies) or information that support or contradict this.

The other jurisdictions with plain packaging have applied plain packaging to roll-your-own tobacco, however, our research did not investigate the other non-cigarette tobacco products mentioned.

7. If adopted, do you think that the SP Proposal might have any incidental impact in the Singapore context other than matters addressed in answer to the above questions? If so, please elaborate on the possible incidental impact and any evidence in support of the same.

No comment.

8. Please include any other comments or concerns regarding the SP Proposal that you would like the Government to take into account.

None.