Ministry of Health
16 College Road
College of Medicine Building
Singapore 169854
Attention: Director, Epidemiology and Disease Control Division

Singapore, June 21, 2018

Study on Standardised Packaging in relation to Non-Cigarette Tobacco Products

Dear Sir/Madam,

We write in response to the publication of the *"Research Study on Singapore Residents' Perceptions and Behaviours in Relation to Tobacco Packaging"* dated June 11, 2018 that complements the Public Consultation Paper on Proposed Tobacco-Control Measures in Singapore dated February 5, 2018 ***(the Consultation Paper)***.

While we continue to believe that it is inappropriate to conduct a public consultation without having a complete and conclusive body of evidence, we wonder why the Government actually released this study for consultation, as it appears that regardless of its outcome it would not change the Government's plan to introduce standardised packaging for all categories of tobacco products.[1]

It is furthermore clear that this latest study is no different from previous surveys that the Government put forward to justify its Standardised Packaging Proposal. **It relies exclusively on attitudes, opinions and self-reports of possible behaviours, and is not capable of accurately predicting changes in actual smoking behaviour**.

Obviously, surveys that ask what the reactions of people to unbranded packs might be, rather than studies that measure the actual effects on initiation, usage and quitting, cannot justify a policy, let alone a far-reaching and disproportionate measure such as standardised packaging.

The Ministry of Health stated last year that: *"… Australia, **France, and the UK** have all implemented standardised packaging. **We have closely studied the experience of these countries**, and see significant value in moving in this direction……"* (emphasis added)[2].

In light of this statement, and rather than relying on surveys that have obvious limitations, it would have been appropriate for the Ministry to demonstrate its own analysis of the evidence coming from these countries, which clearly demonstrates that standardised packaging has no impact on smoking behaviour and prevalence.

Indeed and as indicated in JTI's March 15, 2018 consultation response:

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1 On the one hand, the Consultation Paper claims that this particular study *"may or may not impact the view provisionally expressed in Part 3.3.2…"* (see page. 31 of the Consultation Paper). On the other hand, Part 3.3.2 of the Consultation Paper clearly states that *"The Government intends for specifications in its SP Proposal to apply to the retail packaging of all tobacco products sold in Singapore"* and that *"The Government does not want the public to have the impression that non-cigarette products are less harmful than cigarettes; nor does it want to open up new avenues for circumvention of the policy objectives of the SP Proposal"*. (see page 15-16 of the Consultation Paper).

2 Available at: https://www.moh.gov.sg/content/moh_web/home/pressRoom/speeches_d/2017/speech-by-senior-minister-of-state-for-health--dr-amy-khor-at-th.html.

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- In Australia, the latest official data show that the decline has stopped for the first time. In the Australian Government's own words: *"Smoking rates have been on a long-term downward trend since 1991, but the daily smoking rate did not significantly decline over the most recent 3 year period"*[3], referring to the period 2013-2016, just after the introduction of standardised packaging in 2012.
- The data emerging after the standardised packaging implementation in the UK and France show a similar picture to Australia, i.e. it has actually failed to affect the smoking rates in any of these countries.

With regard to the UK and France, JTI takes this opportunity to share an updated analysis[4] that confirms that standardised packaging (in combination with the requirements of the Directive 2014/40/EU) has not had any discernible effect on smoking rates or tobacco sales either in the UK or in France.

JTI believes that the Standardised Packaging Proposal will lead to similar effects in Singapore as in other countries that implemented the measure, i.e. while standardised packaging might increase the "noticeability" of health warnings and decrease the "appeal" of tobacco packaging, it will not change actual smoking behavior and smoking prevalence.

However and as stressed in JTI's consultation response, the Standardised Packaging Proposal, if adopted, will have a number of detrimental effects that will include:

- the distortion of market dynamics and legitimate competition;
- the destruction of brands, as brand owners lose valuable assets, thereby jeopardising the Government's objective to become a global hub for intellectual property and a place for foreign investors to do business;
- the worsening of the illegal trade in tobacco products, including the possible new threat of counterfeit standardised packaged products, resulting in ample opportunities for criminals; and
- the reduction of government tax revenues by accelerating down trading and fueling the illegal trade.

In conclusion, JTI urges the Government to review the factual evidence emerging from countries with standardised packaging in place and strongly reconsider any plans to introduce a measure with no health benefits and only negative consequences.

Kind regards,

Julia Gough
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[3] See also at: https://www.aihw.gov.au/reports/illicit-use-of-drugs/2016-ndshs-detailed/contents/summary

[4] See Dr Andrew Lilico's November 2017 report *"TPD2 and standardised tobacco packaging —What impacts have they had so far?"* Europe Economics, commissioned by JTI and referred to in JTI's March 15, 2018 consultation response (see part 4.27, Footnote 75). The updated version of this report dated May 2018 can be viewed here: http://www.europeeconomics.com/publications/tpd2_and_standardised_tobacco_packaging_may_2018.pdf.

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