DesignBridge™

6 March 2018

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

(Via post and email (MOH_Tobacco_Control@moh.gov.sg))

Dear Sir/Madam

RE: PUBLIC CONSULTATION ON PROPOSAL TO INTRODUCE STANDARDISED PACKAGING OF TOBACCO PRODUCTS IN SINGAPORE

Please allow me to introduce myself. My name is Joanne Tay and I am the Managing Director of Design Bridge Asia based in Singapore.

On behalf of the company, we welcome the opportunity to respond to the Ministry of Health's invitation to participate in the public consultation on tobacco product packaging design, and share how it can directly impact our business.

Design Bridge is a brand design agency with offices in Singapore, China, London, Amsterdam and New York. We employ around 70 people in our Singapore office, and across the group, we have 390 employees with 31 different nationalities. In 2016, we celebrated our 30th anniversary. We are very proud of the client list that we have built, which includes major brand owners such as Diageo, Akzo Nobel, Carlsberg, Mondelez, Unilever and Japan Tobacco International (JTI).

JTI is one of Design Bridge's largest clients and we are just one of many brand design agencies who work within the tobacco industry. Obviously, tobacco plain packaging, if introduced, would have a significantly negative impact for our business, our employees, the business investments we have made, and the business plans we have mapped out. There has been a speedy erosion of tobacco marketing activity (some quite rightly) over the last 15 years, including the introduction of prominent health warnings on packaging (which are right and proper). However, if plain packaging for tobacco products were to be implemented, apart from fully disabling a brand's ability to compete in the market place, other equally

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important issues around intellectual property will arise, such as the potential increase in tobacco smuggling, and little to no recognition between the tobacco brands that differentiate themselves by the quality and composition of their products.

We have also been tracking the facts around the proven effectiveness of plain packaging introductions, in readiness for other clients and sectors being considered for similar programmes. It is our understanding that Australia and France do not have substantial findings to support the plain packaging approach.

We therefore urge the Ministry of Health to take into account the implications of their proposed regulation to impose plain packaging on tobacco products, and the impact that this would have on the Singaporean society and the local design industry, amongst many others aspects.

We thank you in advance for your attention regarding this matter.

Yours sincerely

Joanne Tay
Managing Director