馬來西亞雜貨商總會
Persekutuan Persatuan² Peniaga² Barang² Runcit Malaysia
Federation of Sundry Goods Merchants Associations of Malaysia

12/3/2018

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

Attn.: Director, Epidemiology and Disease Control Division

Public Consultation on Proposal to Introduce Standardised Packaging of Tobacco Products in Singapore

We read that the Singapore's Ministry of Health (MoH) is conducting a public consultation on standardised packaging for tobacco products and seeking the public's views up until 16 March 2018 on the potential adoption of standardised packaging (also known as "plain packaging") in Singapore.

We write to provide our views on the proposed standardised packaging for tobacco products.

The Federation of Sundry Goods Merchants Association of Malaysia represents over 4,000 members operating over 10,000 sundry businesses in Malaysia. While we have no direct link to policies that are being discussed by the Singapore Government, our members' businesses also includes sale of tobacco products in Malaysia and we are concerned that a proposed policy that is being discussed in Singapore may have an impact on Malaysia as a precedent and trend set in the neighboring country.

While we take note that the Singapore's Ministry of Health's objective through this proposal is to reduce smoking incidence in Singapore, we believe the impact of standardised packaging affects retail business operations to a far-reaching extent. We would thereby like to take this opportunity to list down our views:

1. **Operational Challenge for Retailers**

   Standardised packaging would be tremendously challenging for retail business operations as every cigarette pack would look identical and create difficulty for retailers to identify the difference between one product or brand from another. It is key and crucial for retailers to be able to identify the product as it facilitates sale of product to consumers who have already made the choice to smoke. We believe it is important that this point must be considered carefully and we believe Singaporean retailers would share the same view.

2. **Differentiation Factor for Consumers**

   Similarly, the differentiation factor of one product or brand from another will be difficult for consumers who have made the choice to smoke as all the packs will look the same. Indirectly, this will lead to ineffectiveness of retail operations as retailers will then need to factor in time to search and identify the product or brand that is preferred by their customers.

No.20-2, Jln 1/92B, Pudu Ulu, Off Jalan Cheras, 56100 Kuala Lumpur.
Tel: 03-9205 5966 Fax: 03-9205 5977 Email : fsgmam12@gmail.com

3. **Alternatives measures to reduce smoking**

   We believe that the Singapore Government should exhaust all other measures to reduce smoking incidence before implementing such extreme policy to require standardised packaging. There remains more that could be done to educate smokers to stop or reduce their smoking habit by driving educational and awareness activities.

Therefore, we would like to appeal to the Singapore Ministry of Health to carefully consider this proposal.

We welcome the Singapore Government's move in conducting a public consultation and allowed us to share our views on this matter.

We hope such transparent practice will continue and consultations are conducted with all relevant parties before any decision is being made.

Yours Sincerely,

Hong Chee Meng
President
Federation of Sundry Goods Merchants Association of Malaysia