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

Attention: Director, Epidemiology and Disease Control Division

9 March 2018

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

Dear Sir/Madam:

The Southeast Asia Tobacco Control Alliance (SEATCA) is a multi-sectoral regional network that works closely with governments, non-government organizations, researchers, and the World Health Organization (WHO) to advance tobacco control in ASEAN countries according to the WHO Framework Convention on Tobacco Control (FCTC).

We applaud Singapore's comprehensive tobacco control strategy for reducing tobacco use, protecting the health of citizens from the hazards of smoking, and minimizing the health and socio-economic burden of tobacco harms.

SEATCA fully supports the Singapore government's proposal on (a) regulating the promotional aspects of tobacco packaging; (b) standardising tobacco packaging elements; and (c) increasing the size of graphic health warnings (GHW) on tobacco packaging from 50% to 75%. As noted in the Singapore government's public consultation paper, this proposal is very strongly grounded in scientific evidence and international best practice and is fully in line with the recommendations in the (a) WHO FCTC Article 11 implementation guidelines, aimed at cost-effectively communicating the health risks of tobacco use, encouraging smokers to quit, and discouraging initiation among children and youth; and (b) WHO FCTC Article 13 implementation guidelines, aimed at eliminating the effects of tobacco packaging as a form of advertising and promotion and reducing the attractiveness of tobacco products. Both guidelines recommend Parties to apply standardised packaging to all categories of tobacco products and packaging in addition to large GHWs.

As part of a comprehensive range of tobacco control measures, standardised packaging is a powerful public health measure to reduce tobacco consumption and save lives. We strongly support the Singapore Ministry of Health's plan to move forward on standardised packaging for tobacco products in order to decrease their appeal, remove tobacco advertisement and promotion; eliminate deceptive messages conveyed through packaging; and increase visibility and enhance the effectiveness of graphic health warnings to better inform smokers and public of the health risks associated with tobacco use so as to reduce consumption.

We provide our full support to the Standardized Packaging (SP) Proposal as follows:

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.*

   Response: We commend the Singapore government's commitment to legislate and enforce strong tobacco control measures to continually reduce smoking rates with the recent ban on point-of-sale display of tobacco products, banning the purchase, use and possession of imitation tobacco products, and raising the minimum legal age for purchase of tobacco products from 18 years to 21 years of age beginning 2019. Introducing standardized packaging with

mandatory larger (75%) graphic health warnings is timely to further strengthen the packaging and labelling regulations in Singapore, noting in particular that the current health warning size (50%) has remained unchanged for over 13 years, since GHWs were first introduced in 2004.

We strongly agree that the SP Proposal is necessary and will contribute to further reducing smoking prevalence and improve public health over and above existing tobacco control measures, which it will complement.

Plain packaging, applied as part of comprehensive tobacco control, is effective in reducing positive perceptions of smoking and dissuades tobacco use. It is very likely to contribute to a modest and important reduction in smoking prevalence particularly in young adults and children over time.

Evidence shows this measure already has the desired impact on smoking prevalence and sales of tobacco after the implementation of standardized packaging in Australia in 2012. According to Australia National Drug Strategy Household Survey in 2016 revealed that smoking rates have significantly decreased in daily smokers aged 14 years or older from 15.1% to 12.2%, between 2010 and 2016.[1]

Report on tobacco sales also presents encouraging results. Tobacco sales or purchases of tobacco have continued to fall since the introduction of plain packs. Based on Australian Bureau of Statistics (ABS), total consumption of tobacco and cigarettes in the March quarter 2014 is the lowest ever recorded as measured by estimated expenditure on tobacco products i.e. AUD5.135 billion in September 1959, AUD3.508 billion in December 2012 and AUD3.405 billion in March 2014.[2] It is noted that the fall cannot be attributed solely to standardised packaging; however, it should be considered to have been one of the significant contributing factors.

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.)*

   - Increase the noticeability and effectiveness of graphic health warnings; and
   - Better inform smokers and non-smokers of the risks associated with tobacco use.

   Response: We strongly agree that the SP Proposal has the potential to achieve all five objectives as set out in the consultation paper. This is supported by a large body of peer-reviewed studies and empirical evidence and best practices.

   - Packaging and product design are important elements of advertising and promotion. Tobacco packages are designed by tobacco companies to attract both users and non-users. Tobacco companies use various pack features to attract consumers, to promote their products, and to cultivate and promote brand identity, for example by using logos, colors, fonts, pictures, shapes, and textures on or in packs or on individual cigarettes. By removing these promotional and appealing design features, standardized packaging can help reduce the attractiveness of tobacco products, in particular among impressionable youths and young adults and eliminate the use of tobacco packaging as a form of advertising and promotion, as recommended in the Guidelines for the implementation of FCTC Article 13[3].

     This is borne out by research showing that standardized packs were less appealing and desirable and were strong associated with motivating quit attempts, particularly when coupled with large graphic health warnings.

For example, a focus group study in Glasgow, Scotland found that the removal of branding from packs reduced the attractiveness and promotional appeal of the pack, with dark brown 'plain' packs perceived as more unappealing than light brown and dark and light grey packs by all groups. Dark brown non-branded packaging for tobacco products also helps ensure that pack color does not provide consumers with false comfort about the health risks of smoking.[4]

A study of young adults in France indicated that plain packages are less attractive and would be less likely to motivate the purchase of such packs. Compared to other packs, plain packages were perceived to be the packs most likely to motivate cessation among adults with quitting intentions.[5]

A study among adult smokers in Australia concluded that plain packaging may play even a superior role in undermining brand appeal and purchase intent compared to increasing health warning size. Thus, in addition to large health warnings, which are designed primarily to inform consumers about smoking harms, plain packaging may be even more effective to reduce brand appeal; so both strategies are likely to be required.[6]

- International experience in banning misleading descriptors such as "light" and "mild" has shown that tobacco companies have resorted to the use of different colors (e.g. white and silver) and color gradients (e.g. varying lighter shades of blue) that are equally deceptive in conveying relative levels of harm.[7] In conjunction with larger GHWs, standardized packaging that removes these attractive and deceptive colors will therefore reduce the ability of tobacco product packaging to mislead about the harmful effects of smoking (including on the relative harmful effects between products), in line with WHO FCTC Article 11 obligations to implement effective measures to ensure that tobacco packaging and labelling do not promote tobacco products by means that are false, misleading or deceptive (Article 11.1(a)).[8]

  A number of studies have demonstrated a strong association between pack design and false consumer perceptions of risk. For example, a European (UK, France and Germany) cross-sectional survey of 4,956 adult smokers explored differences in perception of cigarette packs and interpretations of health risks and found a quarter of participants had misconceptions that some cigarettes were less harmful than others.[9] A cross-sectional study of 197 adult smokers and 200 nonsmokers in New York explored the impact of pack design, product descriptors, and health warnings on risk perception and brand appeal and found that larger, graphic health warnings that convey loss-framed warning labels as most effective in communicating health risks to U.S. adults. Pack colors and product descriptors were also associated with false beliefs about risks between brands. It concluded that plain packaging might reduce many of the erroneous misperceptions of risk communicated through pack design features.[7]

- Even with large GHWs on tobacco product packages, package colors and design elements can detract from the effectiveness of the GHWs. By removing these distracting colors and designs, standardized packaging increases the noticeability and effectiveness of health warnings. As stated in the Guidelines for the implementation of FCTC Article 11 (paragraph 46): "measures to restrict or prohibit the use of logos, colors, brand images or promotional information on packaging other than brand names and product names displayed in a standard color and font style (*plain packaging*) … may increase the noticeability and effectiveness of health warnings and messages [and] prevent the package from detracting attention from them."

  Again, a number of studies suggest that plain packaging increases the salience of health warnings. A UK study of adolescents aged 14 to 19, consisting of smokers and non-

smokers, used eye-tracking technology to assess visual attention to health warnings and compare the visual attention between branded and plain packs. The study showed statistically significant findings that, irrespective of smoking status, plain packs increased visual attention to health warnings when compared to branded packs.[10]

- There is also compelling evidence that health warnings on plain packages can be more easily remembered. A Canadian study of 401 teenagers assessed the effects of plain and standard packaging on calling attention to existing mandatory health warnings and found that warnings on plain packages were more effective at getting attention and enhancing recall of direct messages than warnings on regular packages.[11] Another Canadian study of 220 university students aged 19 and older (smokers and non-smokers) assessed effectiveness of health warnings with four different pack designs found that participants were more likely to recognize health warnings and were able to recall warnings with greater accuracy from plain packs. It concluded that health warnings were more effective on plain packs than on original packages.[12]

For all the reasons stated above (reducing the attractiveness of tobacco products and eliminating packages as a means of advertising and promotion of tobacco, reducing the ability of product packaging to mislead consumers, increasing the noticeability and effectiveness of health warnings (especially large ones), the use of standardized packaging can better inform smokers and non-smokers of the risks associated with tobacco use.

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).*

Response: In addition to the draft specifications in the SP Proposal under consideration, we propose the following to be considered for inclusion:

a) A brand name should take up only 1 line on each surface on which it appears and be no longer than 50mm in length and of a specified font size (e.g font size 14).[13,14]
b) A brand variant name displayed on a tobacco package should also only take up 1 line and be no longer than 35mm and of a specified font size (e.g. font size 10).[13,14]
c) Cigarette stick dimensions should also be standardized; cigarettes sticks should be no less than 7mm and no greater than 9mm in diameter and no longer than 95mm in length.[14]
d) The internal surfaces of all retail packages should be the same standardized color as the external surfaces.
e) A similarly unattractive and drab color should be specified for cigarette paper, whether in manufactured cigarettes or for roll-your-own tobacco, to make them less appealing to use.

The first three specifications above are from the New Zealand standardized packaging requirements for tobacco products and packages as stipulated in its Smoke-free Environments Regulations 2017.[14] Having learnt from Australia's plain packaging implementation, New Zealand tightened up grey areas in its legislation that the tobacco industry had been exploiting in Australia.

New product developments in the Singapore market also have implications for the government's SP Proposal. Based on the latest Euromonitor report[15] tobacco companies have shifted towards and invested in cigarette innovations in the form of new flavored variants, including flavored capsule cigarettes, with shorter or longer than standard length of cigarettes:

1) Philip Morris Singapore launched Marlboro Mint Flare and Mint Zing that offer a new flavor with shorter cigarette length and at a lower cigarette price band.

2) Japan Tobacco International launched new variants - Camel Maximum Mint and LD Cool Blast 100s in attractive and colorful packaging. LD and Winston brands have also introduced a longer cigarette stick of 100 millimeters at the same price as regular length cigarettes, which offers a value-for-money cigarette.

Evidently, these product innovations of cigarettes are expected to appeal to low-income and middle-income groups. Already, there is a sales growth of flavored capsule cigarettes from 0.3% in 2011 to 2.3% in 2016, and this is expected to increase due to further ongoing product innovations by the tobacco industry to generate greater consumer interest and enhance their brand loyalty.

Therefore, it is crucial and urgent for the government to regulate and standardize dimensions of cigarette sticks and limit the number of characters for a brand name or brand variant display on the tobacco package.

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).*
Response: NA

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).*
Response: NA

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.*

Response: Yes**,** the SP Proposal should be applied to non-cigarette tobacco products such as cigarillos, cigars, *ang hoon*, and roll-your-own tobacco. The best practice is to apply standardized packaging to all categories of tobacco products regardless of type.

According to the latest Euromonitor report[16], the sales of cigars and cigarillos have increased over the years in Singapore. Both generated 6% retail volume growth in 2016 as sales reached 700,000 units (SGD 15 million), a trend that reflects the accelerating increases in cigar consumption. There is also a new emerging group of consumers of young adults and women, who are becoming more knowledgeable about cigars and willing to experiment with these products. Hence, it is important to make no exception for applying standardized packaging when regulating these products.

In a study[17] in France on young adult smokers of roll-your-own (RYO) tobacco, in which participants used plain RYO packaging for 10 days, participants reported plain packs being associated with less positive pack and product perceptions, lower brand attachment, and less positive feelings about smoking and feelings when using the pack in front of others, compared to their own fully branded packs. The participants were also more likely to report a desire to reduce consumption and quit when using the plain packs, and more likely to want to miss out on rolling a cigarette. This study suggests that the impacts of plain packaging for RYO cigarette smokers are the same as for smokers of factory-made cigarettes.

Another study[18] examined responses of cigar and cigarillo smokers and discovered that those exposed to plain packaging noticed and were concerned by the GHWs, tried to avoid them and felt more like ‘dirty smokers’. Cigar and cigarillo smokers with high plain packaging exposure

reported reduced perceived appeal, quality, taste, enjoyment and value, somewhat increased perceived harm, greater noticeability of GHWs and concealment of packs, and more contemplation of quitting. The study also found strong indications that plain packaging and GHWs substantially reduce the perceived distinctions in prestige and desirability between cigars and cigarettes for cigar smokers. This is a key finding highlighting the influence of plain packaging and GHWs and suggests a need to ensure tobacco control measures aimed at cigarettes also include cigars.

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.*

   Response: We do not think there will be any negative incidental impact if the SP proposal is adopted.

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

   Response: In addition to what has been proposed, we also recommend that the Singapore government should
   a) apply the plain packaging and GHW requirements to all tobacco products in Singapore, including duty-free tobacco products
   b) set a specific date on which the new packaging requirements should be fully implemented at the retail level, ideally within six (6) months of the approval of the new law.

Thank you for this opportunity to comment on this very important pubic health proposal. We stand fully behind the Ministry of Health Singapore and encourage it to stay steadfast in its position to introduce standardized packaging of tobacco products with larger graphic health warning size (75% or larger) in order to protect its public health interest.

We look forward to continuing engagement with Singapore on this endeavor and wish you success.

Sincerely yours,

Ms. Bungon Ritthiphakdee
Executive Director
Southeast Asia Tobacco Control Alliance (SEATCA)
Email: bungon@seatca.org

References:

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