馬來西亞新加坡咖啡茶業聯合總會
Malaysia Singapore Coffee Shop Proprietors' General Association
No. 110 (7th Floor), Jalan Pudu, 55100 Kuala Lumpur, Malaysia.
Tel: 03-20321055/2055 Fax: 03-20323055 E-mail: mscspga@hotmail.com

8th March 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 refer to the above

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

The Malaysia-Singapore Coffeeshop Proprietors General Associations represents over 20,000 coffeeshop operators in Malaysia and Singapore.

As our members' businesses also includes sale of tobacco products in Malaysia and Singapore, we are concerned that the proposed policy will create operational challenges on our members businesses in Malaysia and Singapore.

We understand that the Singapore's Ministry of Health's main objective is to reduce the number of smokers in Singapore through this proposal. However, standardised packaging will create unintended consequences on retail business operations.

In our view, standardised packaging would create operational challengers for retail business. As standardised packaging will see each cigarette pack being identical, this will create challenges for retail operators to differentiate one product from another. Based on current retail operations, the different brands, logos, packaging for pack of cigarettes helps to facilitate sale of the product to consumers who have already made the choice to smoke. However, a change to standardised packaging will create difficulty for retail operators as highlighted here.

Similarly for consumers who have made the choice to smoke, standardised packaging will be difficult for consumers to differentiate one product from another as all the packs will look the same. This will lead to difficulty for retail operators as more time are required to look for the right and preferred brands.

We don't believe an extreme proposal such as the standardised packaging proposal would work to reduce the number of smokers in Singapore. On the other hand, we believe that educational activities and programmes on the health risk associated with smoking could help better to create awareness and influence smokers to cut down on the habit or stop smoking.

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

Thank you.

Yours Sincerely,

MALAYSIA SINGAPORE COFFEE SHOP PROPRIETORS' GENERAL ASSN.
馬來西亞，新加坡
咖啡茶業聯合總會

HO SU MONG
President
Malaysia-Singapore Coffeeshop Proprietors General Association