From: Victor Mills - SICC Chief Executive <victor@sicc.com.sg>
Sent: Wednesday, 7 March 2018 12:36 PM
To: MOH Tobacco Control (MOH) <Tobacco_Control@moh.gov.sg>
Cc: Philip Pang - SICC Government Relations <philip@sicc.com.sg>
Subject: Public Consultation on Proposal to Introduce Standardised Packaging of Tobacco Products in Singapore

Dear Sir/Ma'am

The Chamber fully understands the government's actions to protect public health. It has always fully supported all practical measures to achieve this goal and will continue to do so. However, there are two key business issues with regards to this latest public consultation document which we would like to flag as cause for concern. We would also like to propose a solution for your consideration.

The first issue is that of intellectual property protection. Notwithstanding the health implications related to the use of its products, the tobacco industry remains a legal industry. It is a taxpayer and, therefore, has a right to display its brands and trademarks on its products which includes the use of brand fonts.

The second issue we wish to flag is the importance of policymakers adhering to the reasonableness test.

It is wholly reasonable that the government should wish to make cigarette packets less attractive for public health reasons. Hence, the retail display ban and the graphic health warnings on each cigarette packet. Equally, it is wholly unreasonable to reduce brands and trademarks on cigarette packets to standardized fonts; both because of the retail display ban and because a legal industry has a right to intellectual property protection to display its brands and trademarks on its products including the use of brand fonts.

We suggest the following solution which would enhance the government's aims of protecting public health while satisfying the reasonableness test.

Consideration should be given to increasing the percentage of each cigarette pack covered by graphic health warnings from the current 50% to 85% while permitting the tobacco industry to display its brands and trademarks on its products using its brand fonts.

Please feel free to contact me if anything in this submission is unclear or if you have any questions concerning it.

In the meantime, here is some information on the Chamber: -

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With my thanks and best regards.

Yours faithfully

Victor Mills | Chief Executive

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