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March 13, 2018

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

Attention: Director, Epidemiology and Disease Control Division

To whom it may concern:

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

KEIDANREN (Japan Business Federation) is a comprehensive economic organization with a membership comprised of 1,372 representative companies of Japan, 109 nationwide industrial associations and 47 regional economic organizations (as of March 5, 2018).

With regard to the Government's proposal for the introduction of standardized packaging together with enlarged graphic health warnings (the SP Proposal) in your country (Singapore), I am writing to ask you to pay due attention to the followings in developing regulations.

Firstly, the SP Proposal may cause difficulties for consumers in differentiating a product from another, thereby impairing fundamental functions of trademarks, such as identifying the origin or ownership of a product and guaranteeing the quality and the characteristics of a product.

The proposed measure might also constitute barriers to investment by foreign businesses due to the possible reduction of 'brand switching', as consumers are inclined to purchase those brands of products familiar to them when they are faced with the SP Proposal. On top of that, the adoption of such regulation might lead to the situation where the similar measure is introduced to other products and industries.

Secondly, the SP Proposal may cause unintended negative consequences, such as the proliferation of counterfeit products and consumers' imperfect purchasing decisions.

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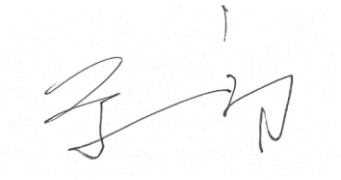
Last but not least, I have no objection to the aim of Singapore's comprehensive, multi-prolonged approach to tobacco control itself and support such ideas to prevent/reduce the opportunities for non-smokers, particularly youths, to pick up smoking and public education initiatives on the harms of tobacco use.

We would appreciate it if you would also respect the above mentioned opinions from legitimate business/investment perspective together with public health perspective.

Sincerely yours,



Ichiro Hara
Director, International Affairs Bureau