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To the Director, Epidemiology and Disease Control Division

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

The South Australian Health and Medical Institute (SAHMRI) welcomes the opportunity to provide comment towards the proposed introduction of standardised packaging of tobacco products in Singapore. SAHMRI is South Australia's flagship health and medical research institute with more than 600 researchers tackling the biggest health issues facing society today. SAHMRI includes the Tobacco Control Research and Evaluation Program, responsible for the provision of evidence-based advice in tobacco control related matters to state and federal governments in Australia and internationally. SAHMRI has reviewed the Public Consultation Paper and are of the opinion that standardised packaging will achieve the five key objectives described in the Proposal and that the Ministry of Health are to be commended for their strong commitment to reducing the burden of disease caused by tobacco in Singapore.

SAHMRI's responses to the consultation questions are outlined below:

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?

Existing tobacco control measures have contributed to a reduction in smoking prevalence over time in Singapore, however, branded tobacco packaging still remains a form of tobacco advertising and marketing[1] that encourage tobacco use. The implementation of standardised packaging in Australia was shown to contribute to a reduction in smoking prevalence[2] and it is likely that this would also occur in other jurisdictions that implement this strategy, including Singapore.

2. Do you agree that the SP Proposal has the potential to achieve one or more of the five objectives set out above? (Please specify which of the above objective(s) you think the SP Proposal may achieve.)

Evidence to date provides strong support to indicate that standardised packaging will fulfil all five objectives outlined in the Standardised Packaging Proposal. Standardised packaging has been shown to reduce the attractiveness of tobacco packs[3], and standardised packaging has been shown to help mitigate the effects of tobacco packaging as a form of promotion and advertising[4,5].

Standardised packaging reduces the ability of packaging to mislead consumers about the effects of smoking by reducing the notion that some brands are less harmful than others and that some brands are easier to quit than others[6]. Standardised packaging has also been shown

to increase the noticeability and effectiveness of health warnings[7], which allows smokers and non-smokers to be better informed 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?

The specifications outlined in Part 3.3.3 are comprehensive and consistent with those that have been successfully implemented internationally.

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?

The South Australian Health and Medical Research Institute supports the proposal to introduce the SP Proposal and are of the view that the proposed regulations for shape, size and look of tobacco products and packaging are appropriate to achieve the proposed objectives.

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?

Not applicable, SAHMRI supports the introduction of the SP Proposal. Furthermore, SAHMRI believe that the introduction of standardised packaging will be most effective when implemented in combination with other tobacco control measures such as taxation and public education campaigns.

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?

The World Health Organization states that standardised packaging should be applied to all tobacco products as best practice[8]. Australian Standardised packaging provisions included all forms of tobacco and research led from SAHMRI has demonstrated the important impact of this on other tobacco smokers.[9] Branded non-cigarette tobacco products are a form of tobacco advertising and promotion, and the South Australian Health and Medical Research Institute does not believe that there is any reason to exclude non-cigarette tobacco products from the Standardised Packaging Proposal.

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.

Concerns about negative incidental impacts of standardised packaging have been shown to be unfounded in jurisdictions that have implemented plain packaging. For example, implementation of standardised packaging in Australia resulted in no lasting increase in pack retrieval times[10], no shift in patronage away from small businesses[11], and no increase in use of illicit tobacco[12], and there is no reason to believe that any negative incidental impact would occur in Singapore as a result of standardised packaging.

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

The South Australian Health and Medical Research Institute congratulates the Singaporean Government on their commitment to reducing the health burden of tobacco by pursuing standardised packaging for tobacco products.

Yours sincerely

Professor Steve Wesselingh
Chief Executive Officer
South Australian Health and Medical Research Institute (SAHMRI)

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