From: John Hirst <john@sra.org.sg>
Sent: Friday, 16 March 2018 1:50 PM
To: MOH Tobacco Control (MOH) <Tobacco_Control@moh.gov.sg>
Subject: Feedback Regarding the Public Consultation on Proposal to Introduce Standardised Packaging of Tobacco Products in Singapore

Dear Sir,

Feedback Regarding the Public Consultation on Proposal to Introduce Standardised Packaging of Tobacco Products in Singapore

The Singapore Retailers Association (SRA) is the retail trade body in Singapore representing almost 300 business, including retailers such as 7-Eleven and Cheers who operate over 1,000 convenience stores in Singapore.

We have consulted with our members in relation to the Singapore Government's on-going consultation on the potential introduction of standardised packaging of tobacco products in Singapore and wish to reiterate the concerns and challenges pertaining to the unintended consequences from such a measure – all the more pertinent given that tobacco sales generally represent between 20 and 40% of some retail outlet's sales.

With regards to the current issue tabled for discussion, and in response to some points raised by your Ministry, we would like to respectfully highlight some key concerns.

1. Staff and customers will be confused and take more time to identify products when transacting.

2. There is a high risk of taking more time to restock products, as all items look similar. Given staff shortages, with most SME's operating with one member of staff alone in store, this is very unfortunate.

3. If the packaging is uniform, there will be a high risk of illegal trade and counterfeit products.

4. The increase in new regulations is a burden for retailers. SRA Members implemented the display ban on 1 Augusts 2017 and will have to deal with the new regulation of minimum legal age of smoking starting from 2019.

5. There is no evidence to show that plain packaging reduced the incidence of smoking so far although it was implemented in Australia and France.

Conclusion:

With the recent implementation of the point of sale display ban in 2017, the minimum legal age of smoking going up progressively from 1 January 2019, and the 19 February 2018 announcement for 10% excise duty increase across all tobacco products, these measures would bring about significant operational and financial impact on tobacco retailers, many of whom are Small and Medium Enterprises like the franchisees. Operationally, we see the Singapore Government's proposal for a 75% expanded graphic health warning as an acceptable alternative to standardised packaging as this would ensure that the distinguishing features of the different tobacco products would still be visible to counter staff.

For the reasons mentioned above, we would like to respectfully request for the Singapore Government to consider conducting more local studies to ensure that our members do not suffer from the unintended consequences that we have highlighted above.

Thank you.

Yours sincerely,

John Hirst | Assistant Director (Industry Development & International Relations)

SINGAPORE RETAILERS ASSOCIATION

1 Coleman Street #05-11B The Adelphi Singapore 179803

D: +(65) 6360 0188

F : 6334 7303

W: retail.org.sg

Online Membership for
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