EU-ASEAN
BUSINESS COUNCIL

16 March 2018

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

Attention: **Director, Epidemiology and Disease Control Division**

Dear Sirs,

Re: Public Consultation on Proposal to Introduce Standardised Packaging of Tobacco Products in Singapore, 5 February to 16 March 2018

We refer to the Ministry of Health's invitation for interested parties to participate in the abovementioned public consultation.

The EU-ASEAN Business Council is a Singapore headquartered, pan-ASEAN platform for European businesses to develop trade and investment interests in South East Asia. The Council is comprised of global European businesses with significant interests in ASEAN. We help to promote good policy and regulations within ASEAN countries for the benefit of their economies as well as EU-ASEAN trade relations.

As a more practical but still effective alternative to standardised packaging, the EU-ASEAN Business Council believes that the enlargement of graphic health warning labels on tobacco products to 65%, as recommended by the European Union's Tobacco Product Directive (2014/40/EU), or to 75% or larger as proposed in the Ministry of Health's consultation paper would clearly provide greater public awareness about the undisputed harms of smoking.

At the same time, the remainder of the tobacco packaging would be allowed for the effective use and visual perceptibility of legally registered trademarks. Not only would this preserve the fundamental intellectual property and trademark rights of legal companies operating in Singapore, it also preserves the legitimate rights of all commercial businesses to be able to clearly distinguish their goods and services and compete effectively against their competitors and deter the trade of illegally smuggled or counterfeit tobacco products. Importantly, this also provides the legal certainty to other consumer goods industries that Singapore would continue to respect and uphold intellectual property and trademark rights.

We hope that the business concerns of our members can be addressed and I would be happy to brief you further if needed.

Yours faithfully,

EU-ASEAN BUSINESS COUNCIL

Chris Humphrey
Executive Director

Cc: Minister for Foreign Affairs; Minister for Trade and Industry (Trade); Minister for Trade and Industry (Industry); Minister for Home Affairs and Law; Minister for Health; Intellectual Property Office of Singapore.

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