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16 March 2018

Ministry of Health
College of Medicine Building
16 College Road
Singapore 169854
Attn: Director, Epidemiology and Disease Control Division

Dear Sir/Madam,

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

We refer to the above and write in to provide our views on the proposed standardised packaging for tobacco products.

Centre for Public Policy Studies (CPPS)

CPPS is an independent and non-partisan public policy institute that aims at fostering open-minded dialogue, enlightened leadership and better governance. CPPS upholds an independent, non-partisan and non-racial stance in its research and other policy-oriented activities. The belief underpinning the establishment of the Centre is that the challenge of building a cohesive, competitive and successful multi-racial Malaysian society can best be met by open discussion buttressed by rigorous analytical work and a spirit of tolerance and respect for the needs and aspirations of all stakeholders in the country.

CPPS views on the proposed standardised packaging

1. **The SP Proposal reduces smoking prevalence**

CPPS commends the Ministry of Health Singapore for considering the standardised packaging policy as a step forward in reducing the instances of smoking in the interest of public health. The Ministry of Health has undoubtedly gathered sufficient evidence to prove that plain packaging will reduce the appeal and therefore the consumption of tobacco products. Even the tobacco companies themselves have produced reports revealing how the appeal of the box has a large impact on the consumption of their products. Hence there is no need to elaborate further on the benefits of plain packaging in reducing smoking prevalence as it is beyond a doubt. Please refer to a study by CPPS on 'Potential Behavioural Shift: Size of

Cigarette Packs'[1] which covers how the Ministry of Health Singapore would be able to use this policy as a powerful nudging tool to cause a shift in smoking behaviour.

2. **Resist intense corporate pressure and lobbying**

It comes as no surprise that protests and objections are coming solely from the tobacco industry who are aware that their sales and profits will fall with the reduction in the appeal of their products. We recommend that the Ministry of Health Singapore resist the intense corporate pressure and lobby which will predictably argue on the basis of intellectual property and competition that is a masquerade for their avaricious pursuit of profits. This self-seeking attitude does not show concern for the general health of citizens as their stance rarely includes, and often not at all, any acknowledgement of public health benefits. The corporate tobacco sector has no alternatives to the excellent policy of standardised packaging.

3. **Singapore is a model country in policymaking and would influence Malaysia**

The standardised packaging will fulfil all five objectives which are set out by the Ministry of Health Singapore. Regarding incidental impact, we believe that Singapore implementing this policy sends out the right signal on the international stage. Developed countries are models for others to follow and first-movers in proficient policymaking as seen by the pioneering efforts of Australia to introduce plain packaging. The government of Australia fought and successfully won two major lawsuits which were brought maliciously at them by tobacco companies. Their example set the foundation for other countries to follow suit with the UK, France and Ireland adopting the plain packaging policy. Hence if Singapore were to join these ranks, it would send the right message internationally to other governments and spur the initiative to clamp down on smoking prevalence in accordance with the Framework Convention on Tobacco Control (FCTC). In Malaysia, the policy for plain packaging is currently shelved and it is hoped that as more countries implement this policy, the Ministry of Health Malaysia will have the courage and political will to execute this policy soonest possible. With Singapore viewed favourably in terms of policymaking and as a model country by health standards, it demonstrates the positive side-effects of 'policy spill-over' which can be influential regionally in ASEAN and even globally.

In view of the above reasons, CPPS hopes that the Ministry of Health Singapore will implement this policy soonest possible in the interest of public health and reducing smoking prevalence.

Yours Sincerely,

Jarren

Jarren Tam

Senior Policy Analyst

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[1] CPPS Discussion Paper. Potential Behavioural Shifts: Size of Cigarette Packs. Available at: http://cpps.org.my/publications/potential-behavioural-shift-size-of-cigarette-packs/