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

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

Dear Sir/Madam

We are responding to the open consultation on a review of the tobacco controls in Singapore to express our concerns that these revisions may have on the operation of the retail activities at Singapore airports which are a major source of commercial revenues for those airports. The European Travel Retail Confederation (ETRC) is the industry body representing the interests of the duty free and travel retail industry in Europe.

We are aware that Asia Pacific Travel Retail Association have made a detailed submission outlining their concerns and we fully support their position and wish to add our voice to the arguments being put forward. We are of the view that the duty free industry should be acknowledged as a unique retail channel due to a number of specific factors that domestic retailers do not experience.

Duty-free retailing is a unique sales channel, which operates under very strict retailing conditions and within a highly controlled environment. Our retail offer is only available to passengers with valid travel documents and only accessed having passed through security channels. As every passenger carries identity documents our retailers can ensure minors do not purchase tobacco or alcohol products.

We also serve a wide customer base, particularly at a major international airport such as Changi Airport, where our customers come from many different nationalities and are seeking products that may not be available on the domestic market. These customers frequently speak different languages and signage in local languages are not effective in communicating to customers the products available within our retail offer. Visual display of branding informs the customers of the products available, their prices, the pack sizes available and their characteristics.

Furthermore as our customers are usually under strict time constraints, efficiency of communication and service are paramount for our industry. Products need to be visible and easily accessible, whilst ensuring as smooth a transition throughout all stages of the sales process.

Passengers have alternative purchasing options rather than at Singapore Changi airport, whether on board their flight, at a transfer airport or at arrivals duty free shops at their point of destination. If they do not make their purchase at Singapore, the sale will simply be transferred to inflight sales on airlines or to another airport, where no display restrictions are in place, and passengers can easily locate their products.

We fully support the detailed submission made by the Asia Pacific Travel Retail Association (APTRA) one of our sister associations. We appreciate the open manner in which you are proceeding and we very much hope to continue this constructive dialogue with you.

Yours sincerely,

Keith Spinks

ETRC Secretary General