16th March 2018

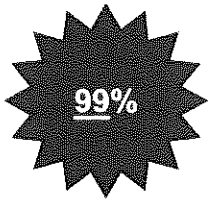
Ministry of Health
College of Medicine Building
16 College Road
Singapore 169854
Attention: Director, Epidemiology and Disease Control Division

Dear Sir/Madam,

Public Consultation on Standardised Packaging and Enlarged Graphic Health Warnings for Tobacco Products

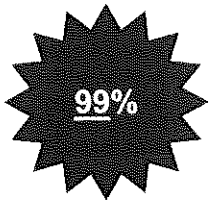
Our trade associations conducted a survey in March 2018 to better understand the concerns of licensed tobacco retailers over the proposal to implement Standardised Packaging and Enlarged Graphic Health Warnings for Tobacco Products. A total of 1804 retailers responded and the main findings of the survey are as follow:

Summary of Results



Operational Issues
Longer service time per customer, more time needed for inventory management etc leading to a loss of productivity and an overall loss of earnings

Minimum Trademarks
Some form of trademarked logo, brand and variant name on both packs and cartons to help differentiate between different pack variants for inventory management and sales transaction purposes



Increase in Illegal Trade
Consumers and law enforcement authorities not be able to easily differentiate legal packs from illicit tobacco products, leading to an increase in already significant levels of illegal trade in tobacco products

Security threat
Rise in criminal gangs involved in smuggling of illicit tobacco products and other illegal activities, and therefore compromise neighbourhood and national security

In addition to the above, we would also like to convey our concerns over the recent introduction of new tobacco regulations. Whilst we support the government's aim to bring down the incidence of tobacco consumption among Singaporeans, we are worried about the implementation of one new regulation after another without allowing for the necessary time to evaluate their effectiveness. The retail display ban was implemented on 1st August 2017 and this was followed by a move to raise the Minimum Legal Age (MLA) gradually from 18 years to 21 years starting from 1st January 2019.

As highlighted previously, the implementation of the retail display ban led to both operational and cost issues for tobacco retailers. The increase in the MLA as our previous survey reflected is also likely to pose a range of problems such as manpower and operational issues that would again have an impact on their business. To overlay these regulations with the introduction of standardized packaging, with the attendant operational and other issues as highlighted in our survey, in the space of a short period of time will increase the burden on tobacco retailers already facing challenges in managing their businesses.

In view of the abovementioned, we once again respectfully reiterate our business concerns related to the proposal to introduce standardized packaging. We urge the Ministry of Health and its agencies to give due consideration to the findings of this survey when deliberating on whether to proceed with standardized packaging and if so when the regulation should come into force. Should the decision to proceed with standardized packaging be made, we respectfully request that there should at a minimum be some form of trademarked logo, brand and variant name on both packs and cartons to help differentiate between different pack variants for inventory management and sales transaction purposes.

We welcome the opportunity to discuss the matters above with you directly and in greater detail. Should you plan to also reach out to the trade for further face-to-face consultations, may we also kindly suggest that you approach as many different groups of retailers as possible to better understand their different business concerns.

Yours sincerely,

Mr Hong Poh Hin
Chairman
Foochow Coffee Restaurant & Bar Merchants Association, Singapore

Mr Lee Kiah Foo
Chairman
Kheng Keow Coffee Merchants Restaurant and Bar-Owners Association

Mr Goo Kem Suaa
Chairman
Singapore Provision Shop Friendly Association

Mr Alan Tay
Chairman
Singapore Mini Mart Association

cc:

Mr Lim Hng Kiang
Minister for Trade

Mr Heng Swee Keat
Minister for Finance

Mr K Shanmugam
Minister for Home Affairs and Minister for Law

Mr S Iswaran
Minister for Industry

Mr Zee Yoong Kang
Chief Executive Officer
Health Promotion Board

Dr Mimi Choong
Chief Executive Officer
Health Sciences Authority

Mr Roland Ng
President
Singapore Chinese Chamber of Commerce & Industry

Ms Rose Tong
Executive Director
Singapore Retailers Association

Mr Ho Meng Kit
Chief Executive Officer
Singapore Business Federation

2018 年 3 月 16 日

流行病学及疾病控制处处长
卫生部
College of Medicine Building
16 College Road
Singapore 169854

尊敬的处长

与烟草产品划一包装和加大健康警示图像相关的公众咨询

商业工会于 2018 年 3 月展开了一项调查，以进一步了解持牌烟草零售商对于实施烟草产品划一包装与加大健康警示图像之提案的顾虑与担忧。一共 1804 名零售商回应了此调查，而主要结果如下：

调查结果总结

99%

运作问题
需要花更长的时间服务每名顾客、需要更多的时间进行存货管理等等，以致生产力下降和生意的整体收入遭受损失

99%

基本商标
香烟包装与箱子需要基本的某种商标标识、品牌与类别名称，以便在进行存货管理与销售买卖时能够更有效率地辨别各个不同的烟草产品

99%

非法交易情况恶化
顾客与执法当局无法轻易辨识合法与走私烟草产品，导致日趋严重的烟草产品非法交易情况进一步恶化

99%

安全威胁
涉及走私非法烟草产品及其他非法活动的犯罪集团数量增加，进而影响邻里与国家安全

除以上所述，我们也谨此向您表达我们对于近期推出的新烟草条例的意见与顾虑。我们支持政府降低新加坡烟草消费的目标，但我们同时也对新条例心存顾虑。新条例接二连三地推出而没有提供所需的时间评定其效益：零售展示禁令于 2017 年 8 月 1 日生效，紧接着是 2019 年 1 月 1 日开始实施将最低法定年龄（MLA）由 18 岁提高至 21 岁。

就如之前所申明，实施零售展示禁令已导致烟草零售商面临运作与成本问题。我们之前进行的调查显示，提高最低法定年龄也将带来一连串的人力及运作问题并再次影响烟草零售商的业务。层叠在这些条例之上的最新提案是划一包装；在如此短暂的时限内推出新条例犹如雪上加霜，让烟草零售商已沉重不堪的业务重担面临更多的运作及其他挑战。

有鉴于上述理由，我们希望能够就划一包装之提案再次重申我们的业务顾虑。我们恳请卫生部与其相关部门在审议划一包装之提案是否应实施及何时生效时，依据此调查结果给予充分考量。若划一包装之提案经通过，我们恳请条例允许香烟包装与箱子上能够印制商标标识、品牌与类别名称，以便在进行存货管理与销售买卖时能更有效率地辨别各个不同的烟草产品。

我们希望有机会与您会面以商讨我们对新烟草提案的想法与意见。若您有意与烟草零售业面谈，我们也希望您能够尽所能与不同的零售业成员会面，以进一步了解他们不同的业务需求与顾虑。谢谢。

洪宝兴先生
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李家赋先生
新加坡琼侨咖啡酒餐商公会主席

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谨启

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