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Año del Fomento de las Exportaciones

16 MAR 2018

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

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

Dear Sirs:

The National Free Zones Council of the Dominican Republic appreciates the opportunity to submit its view in response to the "Public Consultation on Proposal to Introduce Standardised Packaging of Tobacco Products in Singapore".

After carefully reviewing the proposal, our organization shares and recognizes the right of all countries to implement policies to safeguard the health and wellbeing of its citizens. However, we firmly believe that there is no strict scientific evidence suggesting that "Standardized Packaging" leads to a reduction of smoking prevalence, as we have maintained in the context of the World Trade Organizations (WTO) case *DS441: Australia - Certain Measures Concerning Trademarks, Geographical Indications and Other Plain Packaging Requirements Applicable to Tobacco Products and Packaging*.

The Government of the Dominican Republic believes that there are several policy alternatives that could be implemented to reduce tobacco dependency, without harming trademark and intellectual property rights, and that do not encourage trade of illicit products, as we trust that it could be a likely result of Standardised Packaging.

Our organization suggest the Ministry of Health of Singapore to explore legitimate alternatives that take into account potential harm to industries that have profound social and economic impact in small developing countries, such as the Dominican Republic. Currently, our country relies substantially on the tobacco industry, employing more 200,000 people in agricultural activities, tobacco processing and cigars manufacturing. In 2017, the Dominican Republic had a share of 28% in world exports of cigars.

The Government Dominican Republic also believes that not all tobacco products should be treated the same way, considering that there are non-cigarette products, such as Cigars, that have a distinctive consumer profile, typically characterised as an adult that smoke occasionally and usually do not inhale the product



Finally, we encourage the government of Singapore, as a member of the World Trade Organization (WTO) to take into account Article 12.3 of the Agreement on Technical Barriers of that organization, which encourages members to consider the needs of developing countries terms of economic development, finance and trade, to ensure that technical regulations do not create unnecessary obstacles for the exports of developing countries.

Sincerely,



**Luisa Fernandez Duran**

Ambassador - Executive Director