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29 July 2016

The Ministry of Health
PO Box 5013
Wellington 6140
New Zealand

Via email to: standardisedtobacco@moh.govt.nz

Dear Sir/Madam

Standardised Tobacco Products and Packaging

The Royal Australasian College of Physicians (RACP) welcomes the opportunity to provide feedback on the proposed regulations to standardise tobacco products and packaging.

The RACP works across more than 40 medical specialties to educate, innovate and advocate for excellence in health and medical care. Working with our senior members, the RACP trains the next generation of specialists, while playing a lead role in developing world best practice models of care. We also draw on the skills of our members, to develop policies that promote a healthier society. By working together, our members advance the interest of our profession, our patients and the broader community.

The RACP commends the work being done to support the Government's goal to achieve Smokefree Aotearoa 2025. Legislation for standardised tobacco packaging and products will provide an essential component of a comprehensive programme to eliminate all forms of tobacco advertising and promotion. In light of widespread restrictions on advertising, packaging has become the key promotional tool for the tobacco industry to encourage smokers and potential smokers to purchase tobacco products.¹ Research shows that tobacco advertising and promotion increases the likelihood that adolescents will start smoking.² Standardising tobacco products and packaging removes the remaining means for the industry to promote its products, and would therefore help curb the uptake of smoking in the younger population.³

While the RACP agrees with the intent of the proposed regulations within the consultation document, we believe a stronger stance on exact measurements and features of tobacco products and packaging is required. The purpose of having uniformity in regards to exact measurements is to ensure that the tobacco industry has no decision-making powers, which may lead to brand distinction. Additionally we recommend that the country of manufacture is not printed anywhere as it is a form of variance that may also add or detract value for consumers.

¹ Freeman B, Chapman S, Rimmer M, *The Case for Plain Packaging of Tobacco Products*. Addiction, 2008.

² Evans N, Farkes A, Gilpin E, Berry C, Pierce J, *Influence of tobacco marketing and exposure to smokers on adolescent susceptibility to smoking*. Journal of the National Cancer Institute, 1995;p1538-1545.

³ Goldberg ME, Kindra G, Lefebvre J, Liefeld J, Madillmasrshall J, Martohargjono M, Vredenburg H, *When packages can't speak: Possible impacts of plain and generic packaging of tobacco products*, 1995.

As tobacco reform is an area that is constantly developing in reaction to both the tobacco industry and consumers, we recommend that the legislation also include a provision to extend the scope and update the regulations subject to the emergence of new evidence. Further public health research will be necessary to support comprehensive tobacco control and urge the government to continue evaluating its policies and legislations.

The RACP thanks the Ministry of Health for the opportunity to provide feedback on this proposal. To discuss this submission further, please contact the New Zealand Policy and Advocacy Unit on policy@racp.org.nz.

Yours sincerely

A handwritten signature in black ink, enclosed in a thin black rectangular border. The signature is stylized and appears to read 'Jonathan Christiansen'.

Dr Jonathan Christiansen
New Zealand President
The Royal Australasian College of Physicians