

1. Which option do you favour?

- Do nothing about tobacco packaging (i.e., maintain the status quo for tobacco packaging)
- Require standardised packaging of tobacco products
- A different option for tobacco packaging to improve public health

If you prefer a different option for tobacco packaging, please describe it.

2. If standardised tobacco packaging were to be introduced, would you agree with the approach set in paragraphs 4.6 and 4.7 of the consultation?

- Yes
- No
- Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

If standardised packaging was introduced we believe the proposals in 4.6 relating to the products sold to the public is appropriate, although we would favour an increase in the size of health warnings. We believe that standardised packaging removes the ability of the tobacco manufacturers to entice new customers through the use of innovative packaging (for example, the perfume packs) or design on the cigarette itself.

It is likely that the companies will develop other smoking accoutrements that will promote their brand (packet covers, for example). If legislation on standardised packaging were introduced we would welcome consideration of similar legislation to prevent this and its potential to undermine the impact of standardised packaging.

3. Do you believe that standardised tobacco packaging would contribute to improving public health over and above existing tobacco control measures, by one or more of the following:

- Discouraging young people from taking up smoking;
- Encouraging people to give up smoking;
- Discouraging people who have quit or are trying to quit smoking from relapsing; and/or
- Reducing people's exposure to smoke from tobacco products?

- Yes
- No
- Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

4a. Do you believe that standardised packaging of tobacco products has the potential to reduce the appeal of tobacco products to consumers?

- Yes
- No
- Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

We believe that the published studies referenced in the systematic review accompanying this consultation suggest the appeal of plain packs is less than the branded packs. We remain unclear whether this would necessarily translate to fewer consumers in the long term. The studies have not been able to replicate a situation where all tobacco products are in plain packs, and therefore the lack of appeal would be consistent for all products. Whereas a young person may not wish to be seen with an 'ugly' plain pack when friends have normal branded packs, if everybody's cigarettes look the same will this stigma still apply?

4b. Do you believe that standardised packaging of tobacco products has the potential to increase the effectiveness of health warnings on the packaging of tobacco products?

- Yes
- No
- Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

We believe that packs with fewer competing designs would give the health warning greater prominence. Standardised packaging would also mean the small packs used for ultra slim cigarettes would not be in use, and the warnings on these packs are extremely small.

4c. Do you believe that standardised packaging of tobacco products has the potential to reduce the ability of tobacco packaging to mislead consumers about the harmful effects of smoking?

- Yes
- No
- Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

Despite the EU ban on terms such as 'light' or 'low tar' the continued use of colour schemes that were associated with these descriptors mean that people still ask for the 'light' or 'low tar' variants. Standardised packaging should lead to a reduction in the use of these terms as the package design and the terms will no longer be synonymous. Whilst standardised packaging may not mean consumers have greater awareness of the harmful effects, it is likely to reduce misleading information.

4d. Do you believe that standardised packaging of tobacco products has the potential to affect the tobacco-related attitudes, beliefs, intentions and behaviours of children and young people?

- Yes
- No
- Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

The systematic review published alongside this consultation provides study evidence that young people and children find standardised packaging less appealing than branded packs. We remain unclear whether this would necessarily translate to fewer young people smoking in the long term. The studies have not been able to replicate a situation where all tobacco products are in plain packs, and therefore the lack of appeal would be consistent for all products. Whereas a young person may not wish to be seen with an 'ugly' plain pack when friends have normal branded packs, if everybody's cigarettes look the same will this stigma still apply?

If you believe that requiring standardised tobacco packaging could also have other public health benefits, please tell us here. If you believe that requiring standardised tobacco packaging could also have other public health benefits, please tell us here

5. Do you believe that requiring standardised tobacco packaging would have trade or competition implications?

- Yes
- No
- Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

We do not believe that there would be trade or competition implications as the tobacco manufacturers could still sell most of the same products as now, save for some of the ultra slim cigarettes, simply in different packaging. We do believe that any attempt to pass standardised packaging legislation would be challenged on such grounds by the tobacco industry, as has been the case in Australia.

We base this response on reading relevant literature and news sources, not on a knowledge of trade or competition law.

6. Do you believe that requiring standardised tobacco packaging would have legal implications?

- Yes
- No

Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

We do not believe that there would be legal implications as the tobacco manufacturers could still sell most of the same products as now, save for some of the ultra slim cigarettes, with the same brand names, simply in different packaging. We do believe that any attempt to pass standardised packaging legislation would be challenged on such grounds by the tobacco industry, as has been the case in Australia.

We base this response on reading relevant literature and news sources, not on a knowledge of trade or competition law.

7. Do you believe that requiring standardised tobacco packaging would have costs or benefits for manufacturers, including tobacco and packaging manufacturers? Multiple choice checkboxes

Yes

No

Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

If standardised packaging succeeds in its long term aim of reducing smoking prevalence, then this will inevitably lead to cost to the tobacco manufacturers (ie a reduction in their UK market). However, they may also see a reduction in the cost of packaging and brand development. It is likely that the companies will develop other smoking accoutrements that will promote their brand (packet covers, for example).

Initially packaging manufacturers should not see a significant cost as they will still need to produce packaging, albeit standardised in form. Only if smoking prevalence is reduced may they then see a reduction in turnover/income

8. Do you believe that requiring standardised tobacco packaging would have costs or benefits for retailers?

Yes

No

Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

The systematic review that accompanied the consultation refers to studies that suggest retail transaction times were significantly quicker for standardised packs compared with branded packs. This should benefit retailers in that it may lead to reduced queues and the ability to serve more customers in the same time.

9. Do you believe that requiring standardised tobacco packaging would increase the supply of, or demand for, illicit tobacco/non-duty paid tobacco in the United Kingdom?

- Yes
- No
- Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

The demand for illicit tobacco is closely associated with the price of the products, so standardised packaging is unlikely to have a significant impact. Providing the standardised packs still require the markings not visible to the naked eye the ability to identify counterfeit products would still exist.

Counterfeit standardised packs will inevitably be produced, and some involved in the illicit trade may consider that standardised packaging will be easier to reproduce and therefore target the UK market more than they have done before. Smuggled/non-duty paid tobacco from outside the UK would be much easier to identify as it is likely to remain in branded packs.

10. Those travelling from abroad may bring tobacco bought in another country back into the United Kingdom for their own consumption, subject to UK customs regulations. This is known as “cross-border shopping”. Do you believe that requiring standardised tobacco packaging would have an impact on cross-border shopping?

- Yes
- No
- Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

If the same products remain available for purchase in the UK we believe that the main driver for cross-border shopping would remain price.

11. Do you believe that requiring standardised tobacco packaging would have any other unintended consequences?

- Yes
- No
- Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

12. Do you believe that requiring standardised tobacco packaging should apply to cigarettes only, or to cigarettes and hand-rolling tobacco?

- Cigarettes only
- Cigarettes and hand-rolling tobacco
- Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

The market share for hand-rolling tobacco is increasing. The dangers of tobacco are the same, whether hand-rolled or manufactured cigarettes, so the legislation should be consistently applied across all tobacco products.

13. Do you believe that requiring standardised packaging would contribute to reducing health inequalities and/or help us to fulfil our duties under the Equality Act 2010?

- Yes
- No
- Do not know or have no view

Please provide an explanation for the answer you provided and evidence if available.

Smoking is closely linked with health inequalities and a significant contributor to reduced life expectancy in deprived communities. Any legislative action that will lead to a reduction in smoking prevalence is likely to contribute to a reduction in health inequalities.

14. Please provide any comments you have on the consultation-stage impact assessment. Also, please see the specific impact assessment questions at Appendix B of the consultation document and provide further information and evidence here to answer these questions if you can.

15. Please include any further comments on tobacco packaging that you wish to bring to our attention. We also welcome any further evidence about tobacco packaging that you believe to be helpful.