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; or
- ☐ A different option for tobacco packaging to improve public health.

RESPONSE
Require standardised packaging of tobacco products.

2. If standardised tobacco packaging were to be introduced, would you agree with the approach set out 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.
RESPONSE
Yes
The proposals set out in paragraphs 4.6 and 4.7 of the consultation document will dramatically reduce the opportunities available to tobacco companies to promote and target their products. There is, however, scope for going beyond the approach set out in the consultation document.

1. Firstly, extensive research has been conducted for the government in Australia to identify a standardised design for tobacco packaging that minimises the appeal and attractiveness of the product while also maximising its perceived harm and the noticeability of the graphic health warnings. See:
Parr V, Tan B, Ell P, Miller K (2011) *Market research to determine effective plain packaging of tobacco products*. GfK Blue Moon, Sydney.

In line with the Australian approach, the specification of standardised packaging in the UK should also include:
- The inclusion of larger health warnings at the top of the pack, occupying 75% of the front and 90% of the back of the pack.
- The inclusion of graphic warnings on the front as well as on the back of the pack.
- The removal of quantitative information on tar, nicotine and carbon monoxide (as this is misleading) and replacement with qualitative information and advice about the risks of smoking.
- The inclusion of a Quitline number and web address on all packs.

Full details of the Australian standard are available at
http://www.comlaw.gov.au/Details/F2011L02766

2. The names of brand variants should also be controlled. Brand descriptors with positive connotations such as 'smooth', 'slim' and 'gold' should not be permitted. The length of the variant name should also be restricted in order to prevent the variant name from being used as a new means of promotion.

There is good evidence that brand descriptors, as well as colours, continue to mislead smokers about the risks of smoking. See:

Mutti S et al (2011) [Beyond light and mild: cigarette brand descriptors and perceptions of risk in the International Tobacco Control (ITC) Four Country Survey](). *Addiction* doi: 10.1111/j.1360-0443.2011.03402.x.

3. Standardisation needs to encompass cigarette sticks in a similar way to the packs they come in. Size, shape and the materials used will need to be standardised. Careful consideration will need to be given to the appropriate standardised colour so that as with packs, 'sensation transfer' does not lead to false beliefs about the 'healthiness' of standardised cigarettes.

Research published after the completion of the Public Health Research Consortium review shows that characteristics of the cigarette stick affect smokers' perceptions. Consequently changes in the design of the cigarette can differentiate products in a manner that can be used for promotional purposes. Examples include 'slim' and 'superslim' cigarettes and cigarettes with attractive and colourful filters.

See:
Borland R, Savvas S (2012) [Effects of stick design features on perceptions of characteristics of cigarettes](). *Tobacco Control* doi:10.1136/tobaccocontrol-2011-050199

The regulations will need to be strictly drawn and kept under review. The *Financial Times* reports that cigarette companies are looking at a number of innovations. These include conductive inks that mean individual packs could appear blank on the shelf but branded when in the consumer's hand.

See: Mance, H. (12 July 2012) Could printed electronics be getting a cigarette break? *Financial Times*. Available at: http://www.ft.com/cms/s/0/247561ba-cc09-11e1-839a-00144feabdc0.html#axzz22wdqAms5
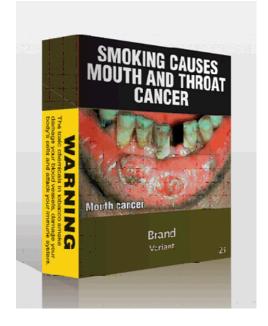
4. Paragraph 4.7 of the consultation document states that 'we do not believe that standardised packaging requirements would be necessary during the course of business solely within the tobacco trade'. This is not logical as, if standardised packaging is the requirement for the market, it is not necessary or helpful to allow current branding to remain for business to business communications.

In the UK some of these changes may need action at EU level. The EU Tobacco Products Directive is currently being reviewed so now is the time for the UK government to press for revisions to the directive which would, for example, allow the UK to mandate larger health warnings, to put picture warnings on the front of packs and to remove quantitative tar, nicotine and carbon monoxide yields on packs and replace them with qualitative information and advice. Plain, standardised packaging could be introduced initially in line

with current EU directive(s) and could then be improved over time as the Tobacco Products Directive is revised.

The approved design for standardised packs in Australia. This design is supported by Cancer Research UK for the United Kingdom and is available at:
http://www.cancercampaigns.org.uk/ourcampaigns/theanswerisplain/moreinformation/

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.

RESPONSE
Yes.

Standardised tobacco packaging will contribute to all four of these outcomes. Our responses to specific consultation questions show that the branding and design of tobacco packaging is used to make the product more attractive and to target specific audiences, including young people. Evidence shows that tobacco branding also distracts attention from the health message on the pack and misleads smokers about the harmfulness of different products.

As a research organisation, Cancer Research UK sees the evidence in the Public Health Research Consortium systematic review as conclusive. The report is well-researched and the methodology employed is of a high standard.

A number of studies included in the systematic review are by Cancer Research UK funded researchers and have contributed to the review's conclusions about reducing appeal, improving the salience of health warnings and reducing false perceptions of product harm and strength:

Moodie et al. 'Young people's perceptions of cigarette packaging and plain packaging An Online survey' Nicotine and Tbacco Research (2012)

Moodie et al. 'Young adult smokers' perceptions of plain packaging a pilot naturalistic study. Tobacco Control (2012)

Moodie, C. Ford, A. Young adult smokers' perceptions of cigarette pack innovation, pack colour and plain packaging. Australasian Marketing Journal (2011)

The size of the impact of standardised tobacco packaging on the outcomes identified is unknown as no administration has yet introduced this policy (Australia will be the first to do so in December 2012). However, the harm to public health of tobacco is so great that every possible means of reducing this harm should be considered – tobacco causes one in four deaths from cancer.

Most smokers start young: two thirds of current smokers started smoking before they were 18 years old and 83% started before they were 20 (General Lifestyle Survey 2010). As young people are particularly brand-conscious, removing all brand identifiers from tobacco packaging has great potential to reduce smoking uptake.

Dunstan, S. *The 2010 General Lifestyle Survey.* Office for National Statistics, March 2012.

4. Do you believe that standardised packaging of tobacco products has the potential to:

a. 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.

RESPONSE
Yes.

Packaging is the major remaining means by which tobacco companies can make their products more appealing to consumers. Consequently every effort is made by the industry to exploit this opportunity in order both to retain smokers and to attract new smokers.

Industry documents
In the late 1990s, legal action in the USA led to millions of internal tobacco industry documents being released. In the same period, the House of Commons Health Select Committee investigated internal documents from the UK tobacco industry's main advertising agencies. By definition they are about past, rather than current, activities.

The Cancer Research UK funded Centre for Tobacco Control Research (CTCR) reviewed the academic research on these documents and found that:
- Brand packaging is a key promotional tool and its importance has grown as it becomes one of the last marketing vehicles.
    - The tobacco industry has made substantial investment in packaging design research since at least the 1950s using focus groups, market surveys and the use of techniques to measure eye-movements.
- Young people and females have been especially targeted.
    - Documents show that tobacco companies monitor packaging to ensure the brand is appealing to youth.
    - Industry documents provide strong evidence of the importance of recruiting new smokers, due to high brand loyalty to the first brand smoked and low rates of switching of brands.
    - Packaging is seen as one of the most important ways for communicating brand imagery, that is, all the associations that consumers connect with the brand.

To keep up with the latest developments, the CTCR audited the tobacco retail press from 2009 to 2011. They found an increasing number of mentions of innovative packaging such as packs that have curved edges, flip tops or side drawers. For example, the Marlboro Bright Leaf opens like a cigarette lighter with a 'click' sound.

There are a number of reports in the retail press of how new packaging designs have boosted sales, for example the introduction of Silk Cut Superslims resulted in a year on year growth of 122% between 2008 and 2009 according to Japan Tobacco International.

Ford, A. 'The packaging of tobacco products'. Chapters 2-3. Cancer Research UK: London. 2012. Available at:
http://www.cancercampaigns.org.uk/ourcampaigns/theanswerisplain/moreinformation/ssLINK/moreinformation/CR_086687

Primary research
The Public Health Research Consortium report demonstrates unequivocally that standardised tobacco packaging is less attractive to consumers than branded packaging (page 37). Tobacco products in standardised packs are perceived as being less fashionable, and of poorer taste, than branded products, especially by younger people and non-smokers.

These findings are corroborated by qualitative research with 15 year olds in Scotland published in May 2012. In total there were eight focus groups divided equally by gender and social grade (ABC1/C2DE) with 48 young people. The researchers found that some branded packs had an emotional impact, with teenagers saying:

"It looks as if you're more mature. Better and more popular." "It makes me feel quite cool … It makes you feel stylish and that, kind of upper class."

Talking about feminine 'superslim' cigarette, girls said: *"If any of them are attractive, it's that one just because it's kind of perfume shaped". "They look too colourful to be harmful."*

Young people viewed plain packs overwhelmingly negatively and consistently viewed them as 'unappealing', 'not for someone like me', unattractive', 'a pack I would not like to be seen with', 'not eye-catching', 'uncool', 'not stylish', unappealing for someone thinking of starting smoking' and 'my friends would not like this pack'.

The researchers found that these negative perceptions transferred to the user of the plain pack, resulting in a very distinct image, which was unappealing and negative in the eyes of participants. They described the image of an old man in ill-health, with old-fashioned clothes and few interests, and a heavy smoker.

Ford, A. 'The packaging of tobacco products'. Chapter 4. Cancer Research UK: London. 2012. Available at:
http://www.cancercampaigns.org.uk/ourcampaigns/theanswerisplain/moreinformation/ssLINK/moreinformation/CR_086687

b. 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.

RESPONSE
Yes.
Currently, brand logos and colours distinguish tobacco products and draw attention away from the health warnings. The removal of these brand identifiers will give greater prominence to these warnings.

The Public Health Research Consortium report concludes that the standardisation of tobacco packaging   'tends to increase the recall of health warnings, the attention paid to them and their perceived seriousness and believability' (page 51).

c. 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.

RESPONSE

Yes.

Subtle differences in the colour and branding of tobacco products are perceived by smokers as communicating differences in their harm. This is misleading as it falsely reassures smokers that they can choose lower risk products.

The Public Health Research Consortium report demonstrates that when lighter colours are used for tobacco product packaging, the products are perceived (wrongly) as being less harmful than when darker colours are used (page 57). The removal of all colour differentiation between different brands will eliminate this source of confusion.

These findings are corroborated by qualitative research with 15 year olds in Scotland published in May 2012. The researchers found that overall, darker coloured packs were described as boring and for older smokers, and associated with greater strength, harm and ill health. In contrast, lighter coloured feminine packets were rated 'appealing to those thinking of starting smoking' and 'weakest'. Teenagers' remarks include: 'They look cool, not friendlier, but they don't look as harmful', 'You wouldn't want to get into the strong stuff at the start', see the packets with the while they look a lot less harmful ... cos it's white, it just looks cleaner'.

In assessing packs without branding but with innovative design features seen in the UK tobacco market, the teenagers generally did not distinguish between packs. Some said they all looked strong and most harmful. Others singled out the slimmer packs as looking weaker and less harmful because they thought they contained less tobacco, indicative of reduced strength. Given what is known about the way in which smokers compensate to ensure a given quantity of nicotine, this is a powerful argument for standardising the size and shape of cigarettes as well as the packets.

Ford, A. 'The packaging of tobacco products'. Chapter 4. Cancer Research UK: London. 2012. Available at:
http://www.cancercampaigns.org.uk/ourcampaigns/theanswerisplain/moreinformation/ssLINK/moreinformation/CR_086687

We recommend that the proposals go further and include the removal of the quantitative information about tar, nicotine and carbon monoxide from tobacco packaging as there is good evidence that this is misleading. See:

Environics Research Group (2003) *Toxics information on cigarette packaging: Results of a survey of smokers*. Health Canada

Gallopel-Morvan K et al (2010) Consumer understanding of cigarette emission labelling. *European Journal of Public Health* doi: 10.1093/eurpub/ckq087

This information should be replaced by qualitative information and advice about the risks of smoking, following the Australian model.

We also recommend that brand descriptors and variant names such as 'smooth' and 'slim' are also prohibited as these are promotional tools which mislead smokers about the relative harm of different tobacco products. See Mutti (2011), cited in response to Question 2, and: Bansal-Travers M et al (2011) [The impact of cigarette pack design, descriptors and warning labels on risk perceptions](). *American Journal of Preventive Medicine*; 40(6): 674-8.

d. 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.

RESPONSE
Yes.
The Public Health Research Consortium report notes that, across the evidence, 'younger respondents were more likely than older respondents to perceive that plain packs would discourage the onset of smoking, encourage cessation or reduce consumption' (page 78).

These findings are corroborated by qualitative research with 15 year olds in Scotland published in May 2012. The researchers found that across the groups, the plain pack was thought to make smoking less appealing to young starters. The negative image surrounding plain packs was a key factor as it look away the 'coolness' associated with smoking.

Ford, A. 'The packaging of tobacco products'. Chapter 4. Cancer Research UK: London. 2012. Available at:
[http://www.cancercampaigns.org.uk/ourcampaigns/theanswerisplain/moreinformation/ssLINK/moreinformation/CR_086687]()

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.

RESPONSE
No.
Trade laws allow for measures to protect the public health. The evidence base supports the implementation of standardised packaging as proportionate and necessary to improve public health.

Standardised packaging would apply equally to all tobacco products sold in the UK wherever they are produced. Removing the promotional aspects of packaging will not limit consumer choice as the brand names will still be on the packs. Retailers and consumers will still be

able to recognise and choose between different brands and there is no evidence to show that the introduction of standardised tobacco packaging would slow down or impede the sales process. The one peer-reviewed study available on this matter found that the retail sale of standardised tobacco products was quicker than the retail sale of branded tobacco products (Carter et al 2011). See:

Carter OBJ, Mills BW, Phan T, Bremner JR (2011) [Measuring the effect of cigarette plain packaging on transaction times and selection errors in a simulation experiment](). *Tobacco Control* doi 10.1136/tobaccocontrol-2011-050087

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.

RESPONSE
No.
The tobacco industry has challenged the implementation of plain packaging in Australia in a variety of legal fora and may take similar action against any other jurisdiction deciding to go ahead with plain packaging.

The tobacco industry has a track record of generally losing or withdrawing its legal challenges on other issues of tobacco regulation, such as tobacco advertising bans, vending machines and display legislation. As with previous regulatory measures introduced by the UK government it is unnecessary for the UK to wait for all legal challenges to be resolved. If every time the tobacco industry threatened or took legal action governments waited until all such challenges were resolved tobacco regulatory measures would be seriously held up with consequent adverse impacts on public health.

Australia is going ahead with plain, standardised packaging in December 2012 before all the legal challenges it faces are likely to be resolved. The evidence is sufficient to support implementation of standardised packaging and the UK should follow the lead of Australia and proceed with legislation as soon as feasible after the consultation is concluded. Delays cost lives.

7. Do you believe that requiring standardised tobacco packaging would have costs or benefits for manufacturers, including tobacco and packaging manufacturers?
    ☐ Yes
    ☐ No
    ☐ Do not know or have no view

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

RESPONSE
Yes.

Standardised packaging will reduce manufacturers' costs as the need to refresh and revise brands and branded packaging will be removed.

Manufacturers will lose the opportunity to present their products attractively and to target their products to different audiences including young people. This is, however, the whole point of the policy.

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.

RESPONSE
Yes.

The introduction of standardised tobacco packaging should not inhibit the everyday sales practice of retailers. The one peer-reviewed study available on this matter found that the retail sale of standardised tobacco products was quicker than the retail sale of branded tobacco products. (Carter et al 2011, cited under response to Question 5)

Retailers are likely to see a decline in sales due to the loss of attractiveness of the product, but this will happen gradually allowing retailers to adjust over time.

9. Do you believe that requiring standardised tobacco packaging would increase the supply of, or demand for, illicit tobacco or 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.

RESPONSE
No.

Since 2000, successive UK governments have pursued a highly effective anti-smuggling strategy, including tough measures to force tobacco manufacturers to control their supply chains. This has reduced the size of the illicit trade from 21% in 2000 to 10% by 2009/10 for cigarettes (see table 3 of the impact assessment). This significant drop in the size of the illicit trade has been driven by tough government action to control the supply side.

On the supply side, the tobacco industry argues that standardised tobacco packaging will be easier to counterfeit than branded packaging and therefore will increase the size of the smuggled market. This does not make sense nonsense as it ignores the sophistication of

current counterfeiting practice. The branded tobacco products available in Britain today have proved to be extremely easy to counterfeit. It is therefore highly unlikely that any change to the design of tobacco packaging will create new opportunities for illicit trade. This trade is responsive to active anti-smuggling measures, not to changes in product design.

In 2008, HMRC and the UK Border Agency launched its updated anti-smuggling strategy, *Tackling Tobacco Smuggling Together*. This included an agreement by the major tobacco producers to include covert markings on their products in order that counterfeit products can be more easily identified by customs and trading standards officers. This was necessary precisely because tobacco products, in all their branded diversity, have proved to be an easy target for counterfeiters.

On the demand side, the tobacco industry argues that the standardisation of tobacco packaging will encourage smokers either to travel abroad to buy more attractive branded packs or to buy imported illicit tobacco products (both counterfeit and authentic brands) which retain current branding. However, despite the fact that the introduction of graphic warnings in the UK in 2008/9 made tobacco products significantly less attractive to smokers, the illicit trade continued to decline in line with the pre-existing trend (see table 3 in the impact assessment). There was no evidence of any change in smokers' purchasing behaviour.

The effects of branding on smokers' choices are significant but they are not so great as to drive smokers to actively seek new sources for products which they can obtain without difficulty at their local shop.

10. People travelling from abroad may bring tobacco bought in another country back into the United Kingdom for their own consumption, subject to United Kingdom 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.

RESPONSE
No.

See response to question 9: smokers are unlikely to increase their foreign travel simply because the logos and colours on their tobacco products have disappeared.

There have been significant declines in cross border shopping in recent years for both cigarettes and handrolled tobacco (see table 3 of the impact assessment). This trend is likely to continue given recent changes in the amount consumers are allowed to bring into the UK for personal consumption. In October 2011 the guide level for importing tobacco from the EU for personal use was reduced from 3,200 to 800 cigarettes and from 3 kg to 1 kg for

handrolling tobacco. This change aims to deter travellers who seek to purchase large quantities of non-UK duty paid tobacco for illicit resale in the UK.

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.

RESPONSE
No.

It is possible that the removal of brand distinctions will push the tobacco companies towards greater price competition leading to lower prices. However, any reductions in the price of tobacco can be compensated for with increases in duty, which would increase government revenues.

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.

RESPONSE
Cigarettes and hand-rolling tobacco.

Standardised packaging should apply to *all* tobacco products including cigarettes, hand-rolling tobacco, cigars, pipe tobacco and shisha. All tobacco products have serious health consequences and should be treated in the same way.

In Australia, this approach has been mandated and shown to be practicable. For example, when single cigars are sold, they are handed to the customer in a standardised bag with the appropriate health warnings.

13. Do you believe that requiring standardised packaging would contribute to reducing health inequalities and/or help us 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.

RESPONSE

Differences in smoking prevalence across the classes account for fully half of the difference in life expectancy between the richest and poorest in society at the current time. Such differences did not exist in the 1970s and have developed in the years since. See: Jarvis, M. J and Wardle, J. (2005) Social patterning of health behaviours: the case of cigarette smoking. In: Marmot, M. and Wilkinson, R. (eds) *Social Determinants of Health.* Oxford: Oxford University Press,2nd edition.

Poor non-smokers have longer life expectancy than affluent smokers. See: Gruer L, Hart CL, Gordon DS, Watt GCM (2009) [Effect of tobacco smoking on survival of men and women by social position: a 28 year cohort study](). *BMJ* 2009; 338 doi: 10.1136/bmj.b480

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 this consultation document and provide further information and evidence to answer these questions if you can.

RESPONSE

Re: costs to manufacturers (questions 1-3)

Long-term costs to manufacturers should decrease as there will be no need to regularly redesign packs to promote specific brands. See: Tiessen J et al (2010) *Assessing the Impacts of Revising the Tobacco Products Directive*. Rand Europe (page 151)

Re: retailing times (question 5)

The available independent evidence suggests that retailing times will reduce following the introduction of standardised tobacco packaging (Carter et al 2011, cited under response to Question 5)

Re: trading down to lower-priced products (question 11)

Consumers are already trading down, so it may be hard to identify the specific effect of standardisation of tobacco packaging on this trend. If the trend continues, it would be inappropriate to attribute the decline entirely to plain packaging. However, if any additional effect is seen, this will be more evidence of the importance of packaging in determining consumer choices.

Re: consumer surplus (question 11)

The Impact Assessment states that "in any discussion of consumer surplus it is implicitly assumed that consumers have stable preferences over time and can therefore be regarded as rationally addicted" citing Becker's theory of rational addiction from 1988. However, 80% begin smoking by the age of 19 and a similarly high proportion of smokers want to quit and regret having started smoking. See:

Dunstan, S. *The 2010 General Lifestyle Survey.* Office for National Statistics, March 2012.

Empirical evidence is clear that decisions over consumption of addictive products, especially tobacco, are not made rationally, and applying the standard rational choice models is mistaken.

See:
Gruber, Jonathan and Mullainathan, Sendhil (2005). *"Do Cigarette Taxes Make Smokers Happier?,"* Advances in Economic Analysis and Policy Vol. 5: No. 1, Article 4 (2005). Available at Johnson, P. *Cost Benefit Analysis of the FCTC Protocol on Illicit Trade in Tobacco Products.* A report prepared for ASH. London. 2009.

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.
If the UK wants to retain its position as a world leader in the implementation of the WHO Framework Convention on Tobacco Control, protecting the health of current citizens and future generations, we need to proceed with plain packaging sooner rather than later. The UK is the standard bearer for tobacco control in Europe and where we lead others will follow.

There is strong public support for the introduction of plain, standardised packaging as specified in Australia, i.e. with larger health warnings and picture warnings on the front of packs.

YouGov polling for Cancer Research UK found that:
- 84% of UK adults believe that children should not be exposed to any tobacco marketing.
- 68% support plain packaging vs 21% who are opposed.

(YouGov. Total sample size was 4099 adults. Fieldwork was undertaken between 30th March - 2nd April 2012. The survey was carried out online. The figures have been weighted and are representative of all UK adults (aged 18+).

Respondents were asked: "It has been proposed that all branding should be removed from cigarette packets. This would mean all packets would look the same. There would be no colours or distinctive logos – only the name of the brand. These would all be printed in the same size and style of lettering, all packets would be the same size, and still carry prominent health warnings. To what extent do you support or oppose this proposed plan for plain packaging?"

Plain, standardised packaging is needed in addition to, not instead of, display bans
Removing tobacco displays along with the implementation of plain packaging has been a key priority for Cancer Research UK for many years.

A report by the Cabinet Office Behavioural Insight Team, *Applying Behavioural Insight to Health*, noted that 'If we know anything from behavioural science, it is that behaviour is strongly influenced by what we think others are up to*.'* The removal of tobacco displays exploits this effect.

Research part-funded by Cancer Research UK found that in Ireland, the prohibition of tobacco displays has been followed by a decline in the number of young people who believe

that smoking is widespread among their peers. Before the removal of displays, 62% of young people thought that more than one in five children their own age smoked. This fell to 46% after the displays were removed. See:
McNeill A et al (2010) Evaluation of the removal of point of sale tobacco promotional displays in Ireland. *Tobacco Control* doi:10.1136/tc.2010.038141

If the legislation allowing tobacco displays were repealed, the displays would reinforce the message that smoking is commonplace and that cigarettes are a normal consumer product, even if the packs were plain and standardised.

In Australia, the only country so far to legislate for plain packaging of tobacco products, the measure is being introduced in addition to, not instead of, the removal of point-of-sale displays. It is seen as a natural progression from, not an alternative to, the removal of displays.

See:
Australian Government (2010) *Taking Preventative Action, A Response to Australia: The Healthiest Country by 2020, The Report of the National Preventative Health Taskforce*.
The removal of displays is also a recommendation of the guidelines to Article 13 of the WHO Framework Convention on Tobacco Control, to which the UK is a Party. Parties are also urged to consider adopting plain packaging. For details of the guidelines, see:
http://www.who.int/fctc/guidelines/article_13.pdf.

Retail registration
We support Action on Smoking and Health in their calls for the licensing of tobacco retailers and monitoring of the tobacco industry's promotional expenditure.