

Tobacco Consultation
Department of Health
Room 712, Wellington House
133-155 Waterloo Road
London SE1 8UG

5 September 2008

Re: Department of Health Consultation on the Future of Tobacco Control

The Smoking Control Network welcomes the opportunity to respond to the Department of Health's consultation on the Future of Tobacco Control, as its members are keen to see the early introduction of a comprehensive, well funded national strategy for tobacco control in this country.

The Smoking Control Network is a collaboration of leading British health charities and commercial and professional organisations, which work together to reduce the deaths and disability caused by smoking related diseases. It aims to reduce smoking prevalence and exposure to secondhand smoke and to encourage smokers to quit.

Members

The Smoking Control Network's voluntary and professional members comprise:

<i>Asthma UK</i>	<i>British Association for Stop Smoking Practitioners</i>
<i>British Heart Foundation</i>	<i>British Lung Foundation</i>
<i>Cancer Research UK</i>	<i>Circulation Foundation</i>
<i>Diabetes UK</i>	<i>Macmillan Cancer Support</i>
<i>No Smoking Day</i>	<i>QUIT</i>
<i>The Roy Castle Lung Cancer Foundation</i>	<i>Royal College of Midwives</i>
<i>Royal College of Nursing</i>	<i>Royal Pharmaceutical Society of Great Britain</i>
<i>The Stroke Association</i>	<i>Action on Smoking & Health (observer)</i>

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The response which follows has the broad support of all members, but there may be differences between elements in this response and the more detailed responses of individual members which are being submitted in their own right.

Yours faithfully

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SCN Responses to Questions posed in the Consultation

Part A: Reducing smoking rates and health inequalities caused by smoking

Question 1: P.17

What smoking prevalence rates for all groups (children, pregnant women, routine and manual workers and all adults) could we aspire to reach in England by 2015, 2020, and 2030, and on what basis do you make these suggestions? What else should the Government and public services do to deliver these rates?

SCN supports the principle of setting prevalence targets, and hopes to see targets put in place to cut smoking prevalence in the general population and amongst routine and manual workers by 2015. Such targets must be supported by systematic measurement and reporting of changes to prevalence and an effective well funded programme to achieve long-term reductions in prevalence over the next twenty years.

Question 2: P.20

What more do you think could be done to reduce inequalities caused by tobacco use?

SCN supports high levels of taxation of tobacco to keep prices high; action to tackle smuggling to prevent this policy from being eroded, alongside increased funding for communications programmes to de-normalise smoking among the poorest households.

Question 3: P.20

Do you think the six-strand strategy should continue to form the basis of the Government's approach to tobacco control into the future? Are there other areas that you believe should be added?

SCN supports the development and introduction of a comprehensive, fully resourced tobacco control strategy based on the current six-strand strategy.

Question 4: P.23

How can collaboration between agencies be enhanced to contribute to the inland enforcement against illicit tobacco?

SCN supports an integrated approach at national, regional and local level to crack down on smuggling.

Effective co-operation will be required between all agencies in the UK - including HMRC, the Department of Health, the Borders Agency, Local Authority Trading Standards departments and Crime and Disorder Reduction Partnerships – and those of the European Commission. We also encourage the UK to work for a strong protocol on illicit trade under the Framework Convention on Tobacco Control (FCTC)¹, and to sign up to the existing EU anti-smuggling agreements, and any subsequent such agreements with tobacco companies.

¹ http://www.who.int/tobacco/framework/WHO_FCTC_english.pdf

Question 5: P.23

What more can the Government do to increase understanding about the wider risks to our communities from smuggled tobacco products?

SCN believes that increased funding should be allocated for effective communication programmes to increase understanding about the harm to our young people and poorest smokers caused by cheap smuggled tobacco.

The introduction of a positive licensing scheme to control the number of premises licensed to sell tobacco would be an effective measure to help clamp down on cheap and illicit tobacco sales.

Tobacco companies should introduce tracking and tracing systems on all cigarettes manufactured by them, so that smuggled tobacco can be identified and withdrawn.

Part B: Protecting children and young people from smoking

Question 6: P.29

What more do you think the Government could do to:

- a. reduce demand for tobacco products among young people?
- b. reduce the availability of tobacco products to young people?

SCN supports:

a: The implementation of a comprehensive fully funded tobacco control strategy aimed at the whole population is the best way to reduce demand among young people for tobacco products, as people start to perceive cigarette smoking as not normal behaviour. Further reducing tobacco marketing, through the removal of tobacco from view at the point of sale and plain packaging of tobacco products would also help to limit the appeal of tobacco products to young people. There is widespread support for such measures.

b: Ending the sale of tobacco through vending machines will help to restrict the availability of tobacco for young people. Action to reduce the number of premises licensed to sell cigarettes would also make a big impact.

Question 7: P.30

Do you believe that there should be restrictions on the advertising and promotion of tobacco accessories, such as cigarette papers?

Yes, SCN believes that the advertising of tobacco accessories should not be allowed to continue, as the tobacco industry have used this loophole in the Tobacco Advertising and Promotion Act 2003, to continue marketing campaigns that promote tobacco use. Much of such marketing is targeted at young people. Promotion of tobacco associated products, such as cigarette papers, matches and lighters, increases consumption of such products, leading to increased consumption of tobacco.

There should be restrictions on all forms of marketing of tobacco and tobacco accessories to recruit new smokers, including through sponsorship or product placement at events, in films or through other forms of entertainment.

Question 8: P.36

Do you believe that there should be further controls on the display of tobacco products in retail environments? If so, what is your preferred option?

We are particularly interested in hearing from small retailers and in receiving information on the potential cost impact of further restrictions on display. What impact would further controls on the display of tobacco have on your business, and what might the cost be of implementing such changes?

Yes - SCN supports Option 3 - the removal of tobacco products from view at the point of sale - in order to limit the exposure of children and young people to tobacco through large and prominent point of sale displays.

Question 9: P.39

Do you believe that there should be further controls on the sale of tobacco from vending machines to restrict access by young people? If so, what is your preferred option?

Yes. SCN supports Option 3 - ending the sales of tobacco via vending machines altogether - as recommended by the WHO. Although such machines account for only 1% of the overall UK market in tobacco sales, they are the source of cigarettes for a disproportionately high percentage of younger smokers.

We remind the Department of Health that no other age-restricted products are made available through vending machines, so this anomaly for tobacco should be rectified.

We reject the other proposals for technological solutions such as electronic age verification, ID coin mechanisms or infra-red remote controls, as evidence from countries that have used such methods shows that they are inherently fallible or open to abuse.

Question 10: P.42

Do you believe that plain packaging of tobacco products has merit as an initiative to reduce smoking uptake by young people?

Yes - SCN believes that this step could be an effective means to make cigarettes less appealing to young people.² England would be well placed to introduce this in conjunction with the restrictions on point of sale displays, as a trial, which must be fully monitored and evaluated.

The tobacco companies themselves have acknowledged the power of packaging as a marketing tool: An internal BAT document stated “It is very difficult for people to discriminate blind-tested. Put it in a package and put a name on it, then it has a lot of product characteristics”. Plain packaging would remove these “product characteristics” which help to make smoking appealing to young people.”

Question 11: P.43

Do you believe that increasing the minimum size of cigarette packs has merit as an initiative to reduce smoking uptake by young people?

Yes – As the majority of 11-15 year olds now buy cigarettes in packs of 10 due to price, SCN supports this proposal, though more research is needed into the issues around the sale of packs of 10, particularly into their potential use in quitting.

² Cunningham R. Smoke & Mirrors: the Canadian Tobacco War. 1996.
Excerpt at http://www.idrc.ca/en/ev-28825-201-1-DO_TOPIC.html

This is in line with the WHO FCTC recommendation in Article 16 that small packets should be prohibited, as they increase the affordability of such products to minors.

An alternative could be to introduce a minimum pack price for cigarettes which would act as a deterrent to purchase by young people.

Question 12: P.45

Do you believe that more should be done by the Government to reduce exposure to secondhand smoke within private dwellings or in vehicles used primarily for private purposes? If so, what do you think could be done? Where possible, please provide reference to any relevant information or evidence to accompany your response.

Yes, a strategy is needed to reduce the exposure of children to secondhand smoke. The DH should run more effective sustained social marketing campaigns to inform parents about the risks of smoking in enclosed spaces such as the car or the home to the health and well-being of the child.

Opinion research should also be undertaken into smoking at home.

The impact of such social marketing campaigns on reducing smoking in cars should be measured. The Government should also appraise the current international evidence to prevent smoking in cars carrying children.

Part C: Supporting smokers to quit

Question 13: P.51

What do you believe the Government's priorities for research into smoking should be?

SCN supports more research to measure the effectiveness of mass media campaigns to influence attitudes towards smoking and behaviour.

Question 14: P.51

What can be done to provide more effective NHS Stop Smoking Services for:

- smokers who try to quit but do not access NHS support?
- routine and manual workers, young people and pregnant women – all groups that require tailored quitting support in appropriate settings?

SCN supports increased investment in the Stop Smoking Services – not least as their interventions are very cost effective.

SCN supports increased social marketing aimed at smokers who find it most difficult to quit, including key groups such as routine and manual workers, and pregnant women.

SCN believes that investment must be maintained in stop smoking services and increased funding channelled particularly to the most deprived areas, where the poorest people smoke the most heavily.

SCN stresses that the Government must ensure that stop smoking services are fully funded - including provision of extra resources in advance of operational policy changes likely to yield an increased demand for support - such as the introduction of smokefree legislation.

Question 15: P.51

How can communication and referral be improved between nationally provided quit support (such as the website and helplines) and local services?

SCN favours community based initiatives to promote local services, in addition to the centralised mass media campaigns.

Question 16: P.51

How else can we support smoking cessation, particularly among high-prevalence or hard-to-reach groups?

SCN believes that all health professionals should receive training in stop smoking support, as put forward in Recommendation 12 of the NICE Guidance on Smoking Cessation Services. Stop smoking services must receive continued guaranteed funding from Government to know and address the needs of their local communities. Additional funding should be allocated and services should be extended into other community settings, to increase the breadth of access for hard-to-reach groups.

Part D: Helping those who cannot quit**Question 17: P.55**

Do you support a harm reduction approach and if so can you suggest how it should be developed and implemented?

Yes, as there will still be a percentage of smokers who find it impossible to quit, harm reduction techniques should be offered to the most hard to reach groups, such as the long term provision of nicotine replacement therapy (NRT) as an alternative to the “dirty syringe” of cigarettes. This must be supported by further research into the possible role of long-term NRT use and its effect on health and on quitting rates.

As the report on Harm Reduction in Nicotine Addiction, published by the Tobacco Advisory Group of the Royal College of Physicians in October 2007, concluded:³

- “Harm reduction in smoking can be achieved by providing smokers with safer sources of nicotine that are acceptable and effective cigarette substitutes.
- There is a moral and ethical duty to provide these products to addicted smokers.
- Current systems of regulation of nicotine products inhibit the development of innovative medicinal nicotine substitutes for cigarettes and perpetuate the use of the most dangerous nicotine products. This is unjust, irrational and immoral.
- Nicotine product regulation must therefore be reformed.
- The unprecedented and unjustifiable market freedoms enjoyed by manufacturers of cigarettes and other smoked tobacco products must end.
- The development of new, more effective, more acceptable and user-friendly medicinal nicotine substitutes for smoking needs to be encouraged.”

SCN/ 5 September 08

³ <http://www.rcplondon.ac.uk/pubs/contents/bbc2aedc-87f7-4117-9ada-d7cdb21d9291.pdf>