

**Submission on  
Smokefree Environments (Tobacco Plain Packaging) Amendment Bill**

**Submission on behalf of:**

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**To: Health Select Committee**

Parliament Buildings  
Wellington

Date: 28 / 03 / 2014

We thank the Committee for the opportunity to make a submission on the *Smokefree Environments (Tobacco Plain Packaging) Amendment Bill* (abbreviated as 'the Bill' hereafter).

The Department of Public Health is one of the leading public health research departments in New Zealand, and includes researchers with substantial experience and expertise in tobacco control and tobacco control research. Our researchers have published numerous scientific papers on tobacco control, including on plain packaging.

We draw attention to the comprehensive submission made by the ASPIRE 2025 research group, some of the key members of which are based in the department.

Tobacco products deprive 4,500-5,000 New Zealanders of life every year, yet are actively promoted to consumers with attractive branding that is designed to appeal to key target groups. Tobacco use is the major contributor to inequalities in the occurrence of major diseases and life expectancy among Māori, Pacific populations and those from low socioeconomic groups. The Bill will help protect future generations from the scourge of tobacco addiction, and greatly facilitate the achievement of the Government's goal of making New Zealand a smokefree country by 2025.

The evidence base for plain packaging is robust, and includes:

- Evidence from empirical studies and internal documents that tobacco companies use on-pack branding as a marketing vehicle to portray smoking as attractive and aspirational;
- Evidence from experimental and naturalistic studies, branding theory and the tobacco industry's internal documents that plain packaging will reduce the appeal and perceived quality of tobacco products, notably among youth and young adults, and increase the salience and impact of on-pack pictorial health warnings;
- Evidence that plain packaging can reduce misleading perceptions of reduced harm created by some brand variants such as those with using white and silver to connote "light" and blue to connote "mild";

- Evidence from Australia that, despite the tobacco companies' dire predictions, plain packaging did not lead to increased transaction times in shops or small retailers going out of business. Nor did the predicted explosion in smuggled tobacco products eventuate. Furthermore, post-implementation studies are now beginning to show that plain packaging has had a positive smokefree effect, with for example smokers reporting a diminished experience from smoking and large increases in quitline calls;
- Evidence of strong and broad-based support among the public.

Plain packaging will remove the last bastion of tobacco product marketing. However, plain packaging is not simply the removal of brand imagery, but the replacement of on-pack livery that promotes tobacco products with dissuasive colours and larger health warnings that discourage smoking and support quitting. Plain packaging will replace packs that actively appeal to children and young people, as is currently the case, with dissuasive packaging which deters experimentation and the subsequent addiction and misery that almost invariably results.

The research evidence supporting the immediate introduction and implementation of plain packaging is clear. We do not consider that New Zealand should wait on international litigation about plain packs, as this is deliberately timed by the tobacco industry to delay the adoption of the policy. Plain packaging is the logical next step in achieving the New Zealand Government's objective of achieving a Smokefree Aotearoa /New Zealand by 2025 and meeting its FCTC obligation to remove all forms of tobacco advertising.

We also recommend that measures should be added to strengthen the Bill and maximize its effect on achieving a Smokefree New Zealand. These include:

- Requiring dissuasive cigarette sticks;
- Specifying the brand and variant names that may be used and restricting these to those currently in use;
- Introducing a wider and frequently replaced array of evidence-based pictorial warnings (including up to 95% of the front of pack), and
- Reformatting the Quitline information so this is more visually salient and impactful and exploring other ways by which the pack can be made a vehicle for promoting and supporting quitting (such as mandating quit advice inserts).

Therefore, we ask the Committee to proceed the Bill to all stage without any delay.

I wish to appear before the committee

No

Signed:

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Name: Professor Richard Edwards