



28 July 2016

**Submission to the Ministry of Health:**

**Standardised Tobacco Products and Packaging Draft Regulations**

The New Zealand College of Public Health Medicine would like to thank the Ministry of Health for the opportunity to make a submission on the Standardised Tobacco Products and Packaging Draft Regulations.

The New Zealand College of Public Health Medicine (NZCPHM) is the professional body representing the medical specialty of public health medicine in New Zealand. We have 224 members, all of whom are medical doctors, including 187 fully qualified Public Health Medicine Specialists with the majority of the remainder being registrars training in the specialty of public health medicine.

Public Health Medicine is the branch of medicine concerned with the assessment of population health and health care needs, the development of policy and strategy, health promotion, the control and prevention of disease, and the organisation of services. The NZCPHM strives to achieve health gain and equity for our population, reducing inequalities across socioeconomic and cultural groups, and promoting environments in which everyone can be healthy.

The NZCPHM recognises that tobacco smoking is a leading cause of preventable death and health inequalities in New Zealand<sup>1</sup> and supports the Standardised Tobacco Products and Packaging Draft Regulations. In New Zealand, it is estimated that smoking is responsible for 4500-5000 deaths every year (including deaths due to second-hand-smoke exposure)<sup>2</sup>. Therefore the NZCPHM supports the goal of making Aotearoa New Zealand a smoke-free nation by 2025 and the numerous evidence based measures across different levels in obtaining this goal, including standardised packaging<sup>1,3</sup>.

The NZCPHM has a strong policy stance over tobacco control including standardised packaging which is outlined in its Tobacco Control and Trans-Pacific Partnership Agreement policies<sup>1,3</sup>. We support standardised packaging as part of a comprehensive range of measures to help New Zealand achieve the goal of a smoke-free nation<sup>4</sup>. Standardised packaging will reduce the attractiveness of the tobacco product, particularly for younger people, thereby contributing to a reduction in smoking prevalence in New Zealand<sup>4</sup>.

In addition to standardised packaging, the NZCPHM supports other evidence based population level tobacco control interventions such as increasing the unit price of tobacco products, mass media campaigns, smoking cessation, school-based education programmes and smoke-free environments legislation to reduce the prevalence of smoking<sup>5</sup>.

In summary, the NZCPHM supports the Standardised Tobacco Products and Packaging Draft Regulations.

Thank you for the opportunity for the NZCPHM to submit on the Standardised Tobacco Products and Packaging Draft Regulations. We hope our feedback is helpful and please do not hesitate to contact the NZCPHM if we can be of further assistance.

Yours faithfully,



Dr Felicity Dumble, President Elect, NZCPHM

#### References:

1. New Zealand College of Public Health Medicine. Policy Statement on Tobacco Control. Wellington: New Zealand College of Public Health Medicine, 2012. Available at: [http://www.nzcphm.org.nz/media/31244/2012\\_06\\_tobacco\\_control\\_policy\\_statement.pdf](http://www.nzcphm.org.nz/media/31244/2012_06_tobacco_control_policy_statement.pdf)
2. Ministry of Health. Tobacco use in New Zealand: key findings from the 2009 New Zealand Tobacco Use Survey. Wellington: Ministry of Health, 2010. Available at: <http://www.health.govt.nz/publication/tobacco-use-new-zealand-key-findings-2009-nz-tobacco-use-survey>
3. New Zealand College of Public Health Medicine. Policy Statement on Trans-Pacific Partnership Agreement. Wellington: New Zealand College of Public Health Medicine, 2014. Available at: [http://www.nzcphm.org.nz/media/31247/2014\\_08\\_14\\_nzcphm\\_tppa\\_policy\\_statement\\_revised.pdf](http://www.nzcphm.org.nz/media/31247/2014_08_14_nzcphm_tppa_policy_statement_revised.pdf)
4. New Zealand College of Public Health Medicine. Submission to Ministry of Health on Proposal to Introduce Plain Packaging of Tobacco Products in New Zealand. Wellington: New Zealand College of Public Health Medicine, 2012. Available at: [http://www.nzcphm.org.nz/media/31303/2012\\_10\\_04\\_nzcphm\\_plain\\_packaging\\_consultation.pdf](http://www.nzcphm.org.nz/media/31303/2012_10_04_nzcphm_plain_packaging_consultation.pdf)
5. Wilson N. Review of the evidence for major population-level tobacco control interventions. Wellington: Ministry of Health, 2007. Available at: [http://www.ccdhb.org.nz/Meetings/CPHACpapers/2007\\_06\\_14/infoonly/review-evidence-major-population-level-tobacco-control-interventions.pdf](http://www.ccdhb.org.nz/Meetings/CPHACpapers/2007_06_14/infoonly/review-evidence-major-population-level-tobacco-control-interventions.pdf)