Dear Chair and Committee Members

Cancer Council Australia writes to provide our strong support for the provisions relating to plain packaging in Bill S-5 and for the Canadian Government’s commitment to implement plain and standardized packaging for tobacco products.

Australia was the first country in the world to implement plain packaging for tobacco products in 2012 and it has been an unqualified success. Extensive evaluation of the implementation of plain packaging in Australia has shown that it is effective, is working as intended and has contributed to the record drop in smoking prevalence seen in Australia. Australia’s comprehensive approach to tobacco control has resulted in a decline in smoking prevalence evidenced in results of its National Drug Strategy Household Survey (NDSH survey), which showed that smoking declined significantly between 2010 and 2013 (from 15.1% to 12.8%), a record reduction of 15.2%. The average three-yearly percentage decline across the nine surveys since 1991 had been 7.6%, with the previous biggest fall being 11%. Results from the 2016 NDSH survey are yet to be released.

In April 2015, the British Medical Journal published a suite of studies showing that plain packaging in Australia was working exactly as intended – reducing the appeal of tobacco products, increasing the effectiveness of health warnings and reducing the ability of the pack to mislead about the harms of tobacco use. These early results also provided some evidence that plain packaging was influencing cessation behaviour.

In February 2016, the Australian Government released the results of an independent post-implementation review of plain packaging, which showed that the measure contributed to the record decline in Australian smoking prevalence over the review period. The review further concluded that the health benefits of plain packaging in improved public health outcomes are expected to grow substantially into the future.

We are dismayed to see that the tobacco industry and their allies continue to peddle myths in Canada about the impact of plain packaging in Australia as they have in other countries who have committed to this important public health measure. The
tobacco industry spread misinformation based on tobacco industry funded reports that have no scientific merit and purposely misrepresent data from Australia’s evaluation.

Two main claims they rely on are that plain packaging ‘has not worked’ and that it has led to an explosion of illicit tobacco use in Australia. Both these claims have been conclusively proven as false by the extensive evaluation undertaken by the Australian Government and studies published in scientific journals.

Cancer Council Victoria has developed a website called Plain Facts [https://www.cancervic.org.au/plainfacts](https://www.cancervic.org.au/plainfacts) which provides access to evaluation undertaken to date, summarises this information into useful Fact Sheets and also provides critiques of tobacco industry funded reports and refutes the misinformation they distribute.

As outlined above, there is no question that plain packaging is working as intended. The Effects of legislation section of the Plain Facts website provides extensive information on the positive impact of plain packaging. Fact Sheet no. 1 on the impact of the legislation and Fact Sheet no. 4 on what has happened to smoking prevalence in Australia provide useful summaries for your Committee’s consideration.


The tobacco industry’s second main claim is that plain packaging has fuelled illicit tobacco sales and use in Australia. A number of studies looked at various measures of illicit tobacco availability and use after plain packaging was introduced in Australia and there is no evidence of an increase in the availability or use of illicit tobacco products more generally. The Plain Facts website collates this information.


The tobacco industry continues to fund KPMG to produce reports that we believe overestimate the level of illicit trade in tobacco products in Australia and are at odds with estimates of use of illicit tobacco reported in Australian Government surveys. The KPMG reports have been regularly critiqued⁴. It is important to note the disclaimers at the beginning of these reports which warn governments and others against relying on the contents. The Committee should also note Robin Cartwright, a KPMG partner, in a letter to the UK Public Health Minister Jane Ellison, dated 2 May 2014 and released under the UK Freedom of Information Act, admitted that: “The report we released recently, Illicit Tobacco in Australia – 2013 Half Year Report, has been somewhat misrepresented by others, without our consent, to suggest it supports the contention that plain paper packaging could lead of itself to an increase in tobacco smuggling and duty avoidance.”

The tobacco industry and their allies will continue to do everything they can to prevent or slow down the implementation of plain and standarised packaging in
countries such as Canada. The two inaccurate claims that plain packaging has not worked in Australia and that it has increased illicit tobacco are not the only ones your Committee are likely to hear. We also draw your attention to the *Industry Opposition* section of the Plain Facts website where other misinformation they have spread is outlined and the facts to disprove these claims provided.

See:  

If you have any further questions on the information provided in this submission or the impact of plain packaging in Australia please do not hesitate to contact us.

Cancer Council Australia congratulates the Canadian Government for putting public health interests ahead of those of the tobacco industry by committing to the introduction of plain and standardised packaging. We stand in full support of the right of the Canadian Government to protect the health of their citizens from the devastating death and disease caused by tobacco use.

Yours sincerely

Kylie Lindorff  
Member, Tobacco Issues Committee  
Cancer Council Australia  
Email: kylie.lindorff@cancervic.org.au

---

2 [http://tobaccocontrol.bmj.com/content/24/Suppl_2/](http://tobaccocontrol.bmj.com/content/24/Suppl_2/)  