



Association of Directors of Public Health – submission to the Independent Review on the Standardised Packaging of Tobacco, 2014

The Association of Directors of Public Health (ADPH) is the representative body for Directors of Public Health (DsPH) in the UK. It seeks to improve and protect the health of the population through DPH development, sharing good practice, and policy and advocacy programmes.

www.adph.org.uk

Directors of Public Health (DsPH) are the frontline leaders of public health working across health improvement, health protection, and health care service planning and commissioning.

ADPH has a strong track record of collaboration with other stakeholders in public health, including those working within the NHS, local authorities, government and other sectors.

ADPH has previously submitted detailed responses to a range of consultation exercises related to tobacco control measures – consistently calling for government to implement evidence-based national action to:

- reduce the harm and health inequalities caused by tobacco – particularly in the most deprived communities;
- reduce the burden of premature death and disability caused by tobacco;
- protect the future health of children in the UK (in light of the 200,000-plus children in the UK who take up smoking each year).

ADPH is a member of the Smokefree Action Coalition – a group of more than 190 organisations - committed to promoting public health and reducing the harm caused by tobacco.

[http://www.smokefreeaction.org.uk/](http://www.smokefreeaction.org.uk)

In July 2013, the Association of Directors of Public Health expressed its strong disappointment and concern over the Government's announcement that it would not move forward with action on the introduction of a minimum unit price for alcohol and standardised packaging of tobacco products. In light of these decisions, and concerns that the Government was seemingly allowing vested interests to adversely influence policies intended to improve the public's health, the ADPH President Dr Janet Atherton confirmed that it was no longer tenable for the Association to be involved with the Government's Responsibility Deal, and that therefore the Association of Directors of Public Health was:

- withdrawing from involvement with the Responsibility Deal in its entirety;
- calling on the UK Government to take action now to reduce health inequalities and the health and wider societal harm caused by tobacco and cheap alcohol across the UK, by moving ahead with minimum unit pricing for alcohol and standardised packaging for tobacco products.

In doing so she commended the approach being taken by the Scottish Government to pursue measures – including standardised packaging for tobacco products - that would contribute to reducing tobacco related harm and improve public health in Scotland; and also welcomed the Welsh Government's expression of concern at the delay in progressing with standardised packaging.

ADPH has therefore welcomed the Government's subsequent establishment of an Independent Review of standardised packaging for tobacco products and welcomes the opportunity to submit evidence.

Our submission presents:

- the outcomes from a **new survey** of Directors of Public Health in England on the issue of standardised packaging and the likely impact on local communities
- examples of local research and activity in relation to standardised packaging (Appendix B).

We would of course be happy to share further in-depth detail and commentary collated in relation to both the survey responses and the examples of local research and activity.

Survey of Directors of Public Health on standardised packaging of tobacco

Directors of Public Health (DsPH) are designated Chief Officers within upper tier/unitary English Local Authorities. DsPH and their Local Authorities have statutory responsibilities for improving the health of their local population.

DsPH are the chief source of advice and expertise for local government on tackling health inequalities, with a focus on health improvement, health protection and healthcare public health. Within this remit is responsibility for wider tobacco control activities and smoking cessation (including NHS Stop Smoking Service).

Given the expertise, status and influence of DsPH as local leaders for public health, we considered it was important to collate and submit DPH views, as additional evidence to inform the Review on standardised packaging, and so ADPH, in collaboration with the Faculty of Public Health (FPH) and with support from Public Health England (PHE), undertook a survey of all Directors of Public Health in England to elicit their views on the issue of standardised packaging and the likely impact on local communities.

The survey – which was sent to the *132 DsPH in post in England - took place between 23rd December 2013 and 7th January 2014. Given the tight timescale for submitting evidence to the Review (which included the 2-week Christmas holiday period) we believe the high rate of response (78 responses) indicates the importance of this issue to DsPH. Given more time, we believe an ever higher response rate would have been achieved.

**There are currently 132 DPH posts across the 152 top-tier LAs in England – some of which are employed across more than one LA or are 'covering' LAs without a substantive DPH in place.*

The questions, answers and analysis of the responses are set out below. Further detailed breakdowns are contained in Appendix A.

The key points highlighted by the survey were:

- 100% of those who responded supported the introduction of standardised packaging and considered the major impact to be to discourage children and young people from taking up smoking, whilst also having a positive impact on encouraging smokers to quit.
- 94% of the Directors of Public who responded considered that standardised packaging would have a positive impact on reducing health inequalities, particularly in relation to children and young people, and to those from deprived communities - including children.
- 65% of the Local Authorities had considered the issue of standardised packaging and the majority discussed this at the Health and Wellbeing Board or with lead Cabinet Members for Health & Wellbeing, Council Leaders and other Council members. Tobacco Control Alliances were also used to consider the issue. 29% of Councils had adopted a formal position on standardised packing.

Summary of responses to the survey

Q1. Has your Authority considered the issue of standardised packaging? (yes/no)

Of 78 individual responses, 51 (65%) responded yes and 27 (35%) responded no.

If yes, what form did this consideration take? (open text)

Health and Wellbeing Boards were the most popular forum for discussion, followed by individual discussion with lead Cabinet Members for Health & Wellbeing, Council Leaders and other Council members. Tobacco Control Alliances were also used to consider the issue.

This response indicates that local authorities are aware of the importance of standardised packaging, as a topical issue, that has implications for their local community.

See Appendix A for detailed breakdown.

Q2. Has your Authority adopted a formal position on this issue? (yes/no)

Of the 76 responses to this question, 22 (29%) said yes, whilst 54 (71%) said no.

This suggests local authorities used existing structures such as Health and Wellbeing Boards or Tobacco Control Alliances to discuss and agree their position, rather than take a formal stance.

Q3. As a DPH, is it your professional opinion that standardised packaging should be introduced? (yes/no)

Significantly of the 75 responses to this question, 100% agreed that standardised packaging **should** be introduced.

What impact do you expect this to have? (Open text)

Of those who responded to the question 'what impact do you expect this to have' (67 detailed responses), the most significant impact identified (by 36 responders) was that of reducing the initiation of smoking, and particularly that amongst young people.

DsPH also felt that standardised packaging would make smoking less attractive, would reduce tobacco consumption, and encourage smokers to quit.

See Appendix A for detailed breakdown.

Q4. Do you consider that standardised packaging would have an impact on health inequalities in relation to any specific population groups? (yes/no)

If yes, please specify which groups and how (open text)

Of the 77 responses to this question, 72 (94%) agreed that standardised packaging would have an impact on health inequalities in relation to specific groups.

DsPH said that the groups most likely to be affected were children and young people (n.35), and people from deprived communities including children (n.29). DsPH also considered that those with health problems (ranging across mental health issues, long term conditions and respiratory conditions); young females, existing smokers; and those from ethnic minority groups would be positively influenced by standardised packaging.

It was felt that standardised packaging would help those with challenging financial circumstances if they were able to quit smoking ('help save money for essentials'), and stop children and young people from smoking cigarettes ("reduce attractiveness for children"). Salience of health warnings was also likely to increase ("improves effectiveness of health warnings"), thus contributing to a reduction in smoking prevalence and health inequalities overall.

See Appendix A for detailed breakdown.

Conclusion

As highlighted by this new survey of Directors of Public Health:

- 100% of those who responded supported the introduction of standardised packaging and considered the major impact to be to discourage children and young people from taking up smoking, whilst also having a positive impact on encouraging smokers to quit.
- There is good local engagement and activity on this issue – however national action is needed in order to reduce health inequalities and the health and wider societal harm caused by tobacco.

ADPH strongly believes that there is extensive evidence to support the case for immediate action by Government on standardised packaging for tobacco products in order to reduce health inequalities and the health and wider societal harm caused by tobacco; and supports the conclusions of the systematic review of the evidence for plain tobacco packaging, commissioned by the DH and carried out by the Public Health Research Consortium, that “there is strong evidence to support the propositions set out in the Framework Convention on Tobacco Control relating to the role of plain packaging in helping to reduce smoking rates; that is, that plain packaging would reduce the attractiveness and appeal of tobacco products, it would increase the noticeability and effectiveness of health warnings and messages, and it would reduce the use of design techniques that may mislead consumers about the harmfulness of tobacco products.”
http://phrc.lshtm.ac.uk/project_2011-2016_006.html)

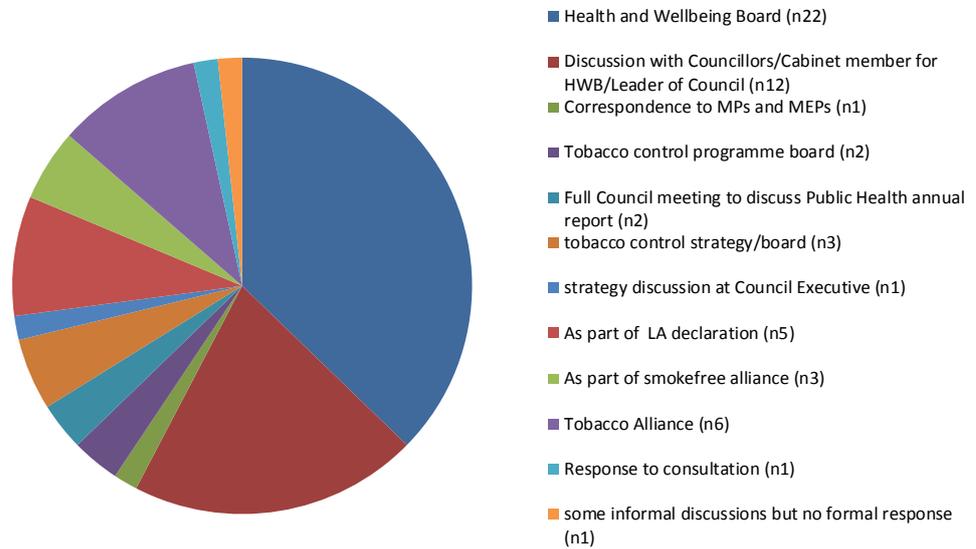
**Association of Directors of Public Health
January 2014**

Appendix A – Survey of Directors of Public Health on standardised packaging

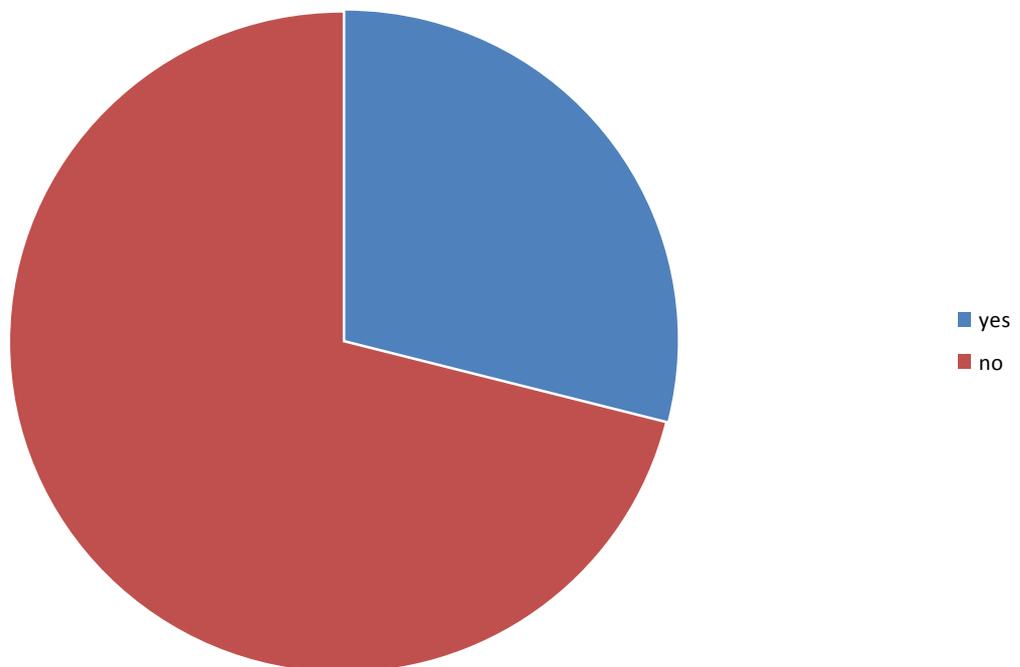
Summary of responses

Q 1. Has your Authority considered the issue of standardised packaging?

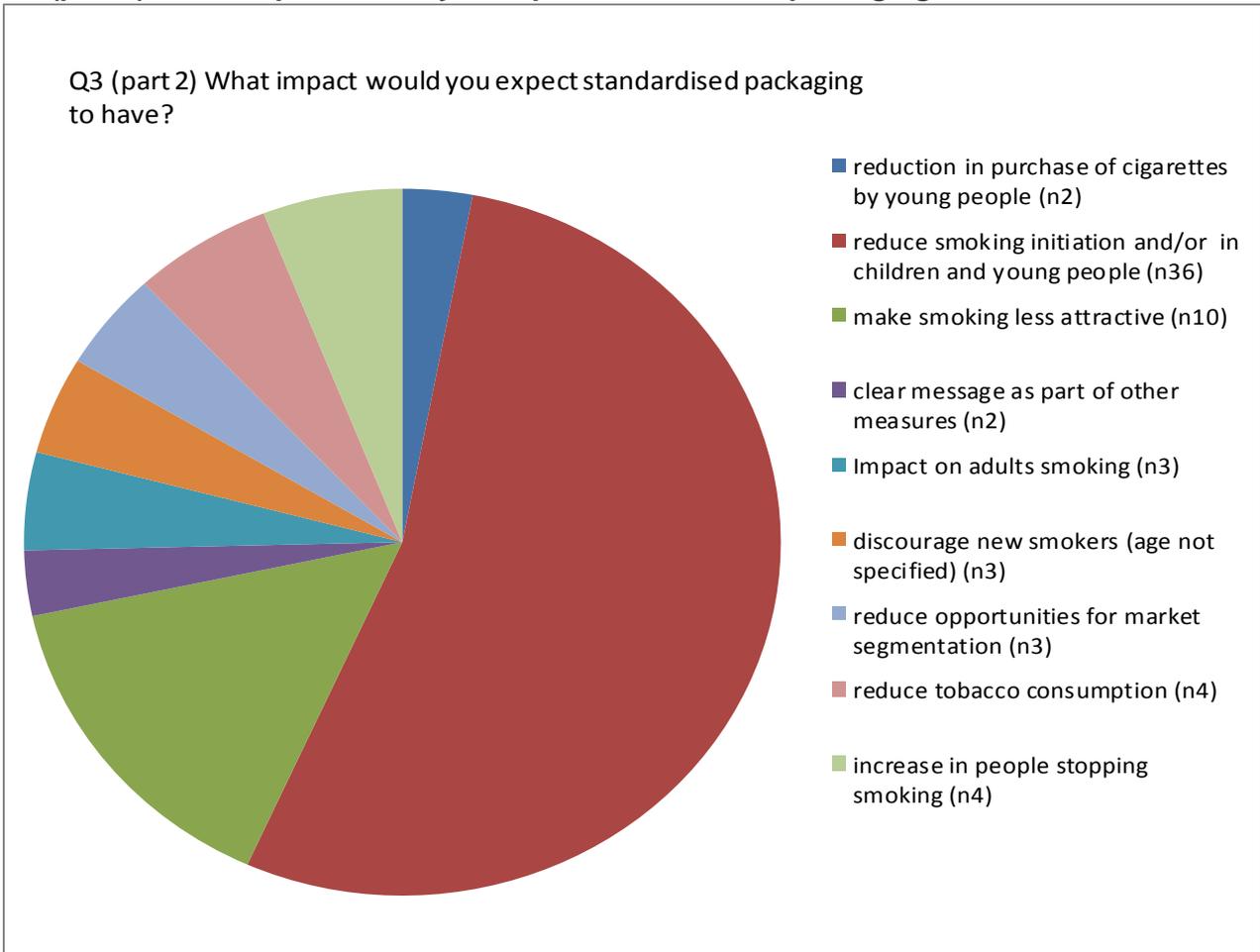
Has your Authority considered the issue of standardised packaging? (of 78 responses, 51 said 'yes')



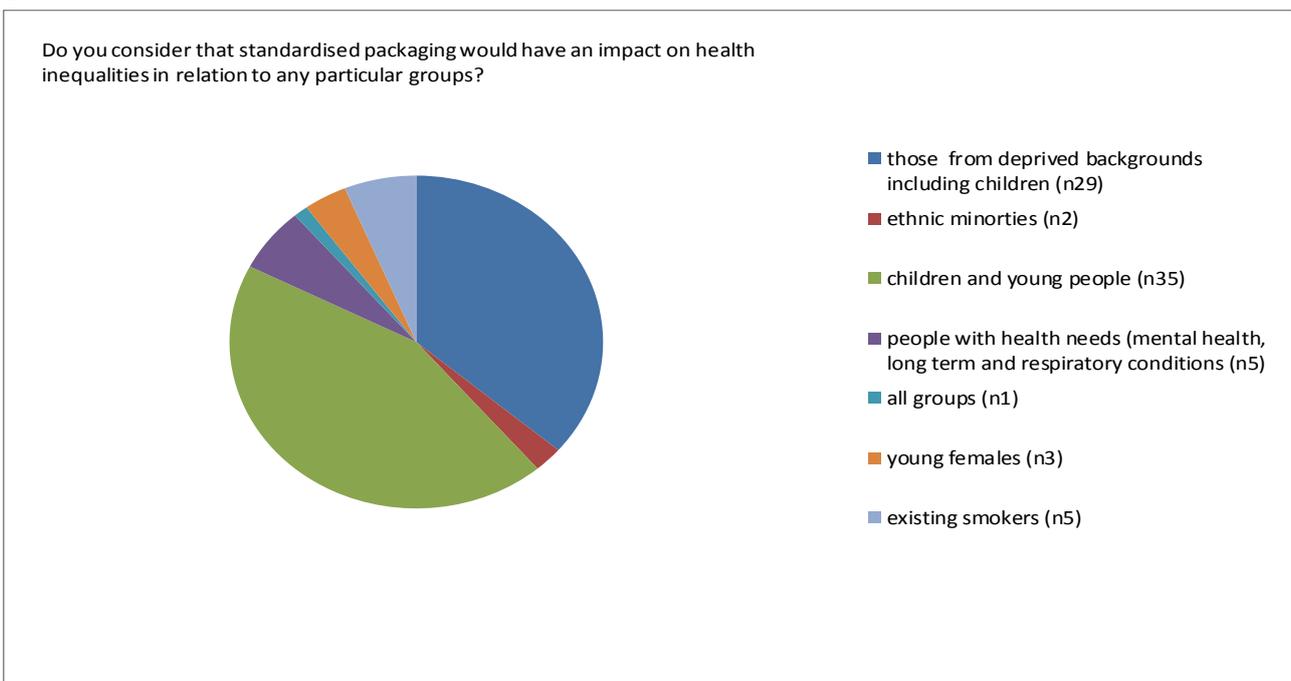
Q2. Has your Authority adopted a formal position on this issue?



Q3 (part 2). What impact would you expect standardised packaging to have?



Q4. Do you consider that standardised packaging would have an impact on health inequalities in relation to any specific population groups? If yes, please specify which groups and how



Appendix B – Examples of local research and activity in relation to standardised packaging

Below are examples of recent research on standardised packaging conducted by a range of Local Authorities. Given more time, ADPH would be happy to collate further examples of local research & activity to present to the Review.

Durham County Council

Durham County Council is the lead commissioner of 'Fresh' (the first sub national tobacco programme) for all north east local authorities. Fresh asked the views of the public out on the street around standardised packaging and a video of this can be viewed at: - <http://www.youtube.com/watch?v=cjth2-4OBRE&feature=relmfu> .

This includes:

- Young women discussing how some brands would tempt young people to buy cigarettes
- A former smoker explaining the lure of brands and peer pressure
- A shopkeeper explaining why standardised packaging would reduce the appeal of the packet to children, and why it could result in customers having more money to spend on higher profit items.
- The North East Trading Standards Association explaining why they do not believe this would lead to an increase in smuggling

There is already strong public support for plain, standardised packaging measure. Adults within the North East were shown an image of a plain standardised pack and 66 per cent said they support requiring tobacco to be sold in plain, standardised packaging, with the product name in standard lettering. Only 10 per cent of adults opposed plain packaging. In addition, figures from Cancer Research UK show that 85% of North East adults believe children should not be exposed to any form of tobacco promotion.

(ASH. Smoke Free England survey 2012. Prepared by YouGov)

Evidence from a Durham School: Belmont School in County Durham were conducting an investigation into subliminal messaging by company advertising. A number of young people looked at the tobacco industry imagery, they also looked at packaging. They had not initially made the connection between cigarette packaging and advertising. However when they discussed this further and when they were shown examples of packaging there was an immediate favourable response to the colourful packaging especially from young females (smokers). One young male student said, "I don't know how they sleep at night". His reaction was to that of the industry tactics of promoting their product which harms and kills people.

Swindon Borough Council

Smokefree Southwest conducted some local research on behalf of Swindon Borough Council on the public's reaction to cigarette packaging. The Plain Packs Protect First Impressions video here: <http://tinyurl.com/ngh69ev>

Dudley MBC

Dudley Kick Ash Campaign: <http://www.youtube.com/watch?v=kcnZ4UZhJQ0>

The video clip can also be accessed from the Dudley Kick Ash website where the young people document all their work: <http://www.dudleykickash.com/portfolio/campaigns/>

Warwickshire County Council

Warwickshire County Council was one of the early adopters of the Local Government Tobacco Control Declaration. More information on activity in Warwickshire can be found at: <http://publichealth.warwickshire.gov.uk/> and <http://hwb.warwickshire.gov.uk/>

ADPH
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