

Submission to the Australian Government's Consultation Paper on the *Tobacco Plain Packaging Bill 2011 Exposure Draft*:

June 2011

Summary points

- **AGPN, the peak body for Australia's general practice network, supports the Tobacco Plain Packaging Bill**
- **The provisions of the Bill are consistent with the policy objectives of both the National Primary Health Care Strategy and National Preventative Health Strategy**
- **The rationale and evidence based for plain packaging is well outlined by the National Preventative Health Taskforce documentation**
- **Best practice tobacco control involves a multifaceted approach involving taxation policy, legislation, public education and health systems intervention. General practice networks and evolving Medicare Local primary health care organisations are well placed to support general practice and primary health care providers deliver evidence-based health interventions to support smoking cessation, complementing other government policy measures such as the provisions of this Bill.**

The Australian General Practice Network (AGPN) welcomes the opportunity to provide comment on the Australian Government's Consultation Paper on *Tobacco Plain Packaging Bill 2011 Exposure Draft*. AGPN represents a network of 111 local organisations (general practice networks (GPNs)), as well as eight state and territory based entities. Collectively these organisations are known as the Network. More than 90 per cent of general practitioners and an increasing number of allied health professionals and practice nurses are members of their local GPN. The Network is involved in a wide range of activities including health promotion, early intervention and prevention strategies, chronic disease management, health service development and delivery, workforce education and support

and information and data management. In particular, the Network actively supports a number of programs designed to support smoking cessation such as:

- *Lifescrpts*: evidence-based tools, including Pregnancy Lifescrpts and Indigenous Lifescrpts, to support the general practice team to work with patients to address the main lifestyle risk factors for chronic disease
- COAG Type 2 Diabetes Prevention Program which includes local lifestyle modification programs with smoking cessation modules.

AGPN supports and applauds the Australian Government in its bid to take further action to decrease smoking rates in Australia. This is in line with both *Australia's First National Primary Health Care Strategy*, which has as its cornerstone an increased focus on prevention and better management of chronic conditions through lifestyle behavioural modification and the *National Preventative Health Strategy*, which outlines a number of evidence-based measures to reduce smoking rates. Importantly, it is in line with our commitments to the WHO Framework Convention on Tobacco Control where, as the Preventative Health Taskforce acknowledged, Australia can be both a role model for other countries and play a part on helping to implement similar policies in other countries, especially low and middle-income countries where tobacco promotion is rampant and tobacco control is in its infancyⁱ.

There is sound Australian and international evidence which illustrates that government tobacco control interventions that span taxation policy, public education, legislation and health systems intervention can be highly effective. As the Government points out in its consultation paper, a number of multi-pronged intervention strategies can be attributed to the 13.9% decrease in Australian smoking rates over the past three decades (1988-2007), including the National Tobacco Campaign, advertising restrictions, health warnings on packages and increases to tobacco excise. Despite the insurmountable evidence now demonstrating the dangers of smoking, smoking related illness still kills more than 15,000 Australians every year at an estimated economic and social cost of \$31.5 billion annually. Government intervention must therefore be accelerated to reduce these unnecessary deaths and curb the social and financial burden of smoking.

The Preventative Health Taskforce pointed to a number of modifiable tobacco marketing factors that make smoking easier to take up and harder to quit including brand names and package design that not only convey social identity and aspirations but that can also induce smokers to believe their cigarettes to be lower in strength, tar and health risk than they

actually are. In addition, the Taskforce accumulated an evidence base around the potential effects of plain cigarette packaging, including a decrease in appeal to smokers and non-smokers - especially for younger people, its increase in the salience of health warnings presented on packs, and its potential to minimise the misperceptions about the relative strength, level of tar and health risks of tobacco productsⁱⁱ. As

Additional to the evidence supporting government intervention in achieving cessation rates, Australia is obliged under the World Health Organization *Framework Convention on Tobacco Control*, to which it is a signatory, to develop and implement a number of measures to reduce smoking rates. These include measures to ensure that tobacco packaging does not promote a tobacco product by any means that are false, misleading, deceptive or likely to create an erroneous impression about its characteristics, health effects, hazards or emissions; and to implement comprehensive bans on tobacco advertising, promotion and sponsorship.

Australia is therefore not an outlier in implementing this legislation, but rather a world leader in the prevention and management of largely preventable or manageable chronic disease brought on by behavioural factors. AGPN reiterates its support for this bill, and looks forward to seeing the effects of its rollout as it complements *Australia's First National Primary Health Care Strategy* and the work of the National Preventive Health Agency.

Yours sincerely



Leanne Wells
Executive Director, Policy and Business Development

ⁱ Australia: The Healthiest Country by 2020 – National Preventative Health Strategy – the road map for action (2009)

ⁱⁱ *ibid*