

WJC/ys/W001

John Glen
Scottish Executive Health Department Tobacco Control Division
3 E(R)
St Andrew's House
Regent Road
Edinburgh EH1 3DG

Rec'd 26/02

Dear Mr Glen

CONSULTATION ON THE DRAFT SMOKING, HEALTH AND SOCIAL CARE (SCOTLAND) ACT 2005 (VARIATION OF AGE LIMIT FOR SALE OF TOBACCO PURCHASE AND CONSEQUENTIAL MODIFICATIONS) ORDER 2007

We refer to the consultation launched on 7 December 2007 and would like to make the following comments.

We have no particular view on whether the age for sale should be increased to 18. However, we recognise the operational benefits for retailers of having an age in line with alcohol and other products.

For retailers the crucial element is that the practicalities of implementation of an increase to 18 are fully considered. This will particularly be in relation to where 16 and 17 year olds who have been able to purchase cigarettes legally being no longer able to do so. Retailers will be at the sharp end and this could lead to abuse and intimidation of shop staff if not managed effectively. As the consultation recognises, the Executive will need to undertake a communication campaign to advise the public and retailers of the change. The communications campaign must start as soon as the decision is made and be persistently repeated in the run-up to the changeover to ensure the message is assimilated and understood.

In terms of the period of time between announcement of change and effecting the increase, we would be supportive of option two for the period of transition to be a 6-12 month period. A longer period could, as the consultation points out, dilute the communication message. We are also cognisant of the move to increase the age for sale of tobacco to 18 in England and Wales that was recently announced take effect from 1 October 2007. As a retailer trading in all parts of the UK, it would be helpful on an operational level if the timing of change could be introduced in all parts of the UK at the same time which would fall within the timeframe of option two.

Yours faithfully



Ken MacKenzie
Chief Officer
SCOTTISH CO-OP



INVESTOR IN PEOPLE