

01-51

Smith L (Lee-Anne)

From: Glen J (John)
Sent: 01 March 2007 10:03
To: Smith L (Lee-Anne)
Subject: FW: SGF response to smoking consultations

JOHN GLEN
Tobacco Control Team
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-----Original Message-----

From: Gordon MacRae [mailto:g.macrae@scotgrocersfed.co.uk]
Sent: 28 February 2007 16:31
To: Glen J (John)
Subject: FW: SGF response to smoking consultations

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My apologies, the previous versions contained no contact details.

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Registered Office: 222 Queensferry Rd, Edinburgh, EH4 2BN.*

From: Gordon MacRae [mailto:g.macrae@scotgrocersfed.co.uk]
Sent: 28 February 2007 15:51
To: 'john.glen@scotland.gsi.gov.uk'
Subject: SGF response to smoking consultations

SGF is happy for our responses to be made public.

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SGF

Scottish Grocers' Federation

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28 Feb 2007

Dear Mr Glen,

Response to consultation on the draft Smoking, Health and Social Care (Scotland) Act 2005) (Variation of age limit for sale of tobacco purchase and consequential modification) order 2007

Thank you for the opportunity to respond to this consultation which represents a landmark moment in Scotland's approach to the nation's health. As the authoritative voice of the Scottish convenience store sector, SGF (Scottish Grocers' Federation) is eager to ensure that the policy objectives of Ministers and the Scottish Parliament are realised through a smooth transition. We wish to avoid a situation which exposes staff to abuse, intimidation and violence by consumers who have their legal right to buy tobacco products removed overnight.

Principle of varying the age limit for sale of tobacco

SGF does not take a view on what the appropriate age limit to purchase tobacco should be. Our response focuses on the practical impact of any change which Minister's may choose to pursue.

Time-scale for varying the age limit for sale of tobacco

SGF believes that of the two options to increase the age limit for purchasing tobacco, option 3 would provide the most practical solution. Indeed in the event of an age limit rise to 18, a 12-18 month timeframe is not only desirable but is essential. This option would provide Ministers with the opportunity to address the woeful lack of support for retailers to enforce an increased number of responsibilities relating to age restricted products.

Support for retailers

SGF believes that any change to the age limits on age restricted products should be viewed in conjunction with recent changes to law surrounding other age restricted products such as the new alcohol licensing regime. A balanced approach which matches retailers' responsibilities with the right to have the necessary tools to police the new law should be forthcoming.

The introduction of a free, compulsory proof of age card for all 12-26 year olds should be viewed as an urgent priority. Scotland does not have an ID or proof of age culture despite

attempts by industry to encourage its use. SGF promotes 'Challenge 21' to our members but the absence of a national card requests for ID can create moments of conflict in stores. Staff deserve the protection and support a national proof of age scheme would provide. An industry led scheme is limited in the penetration it can have and leadership from Government is required.

We welcome the introduction of the National Entitlement Card and the Young Scot Card which are welcome moves in the right direction. They are not however answers to the problem because they are predominately used by a limited group of 12-15 year olds. Scottish Ministers must prioritise proof of age for people legally entitled to purchase age restricted products. A target of 100% coverage by 2009 should be set.

Communications Campaign

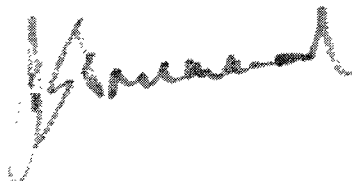
It is our view that the budget for a public information campaign is under budgeted by around £150,000. A minimum spend of £350,000 is necessary for an effective paid for advertising campaign in addition to PR and below the line activities.

SGF takes issue with the suggestion in para 8.2, page 16, of the consultation, that a longer lead in time would dilute the message. On the contrary coupling the campaign with a proof of age campaign to coincide with the new alcohol licensing regime would strengthen the message rather than diminish it. Equally it would be unwise to run the focussed communications campaign for the full duration of the transition period. It is likely that any campaign would run for a similar duration no matter whether the transition is 6 or 18 months.

Future measures to curb tobacco use in Scotland

SGF welcomes the recognition that any change to the age limit to purchase tobacco will not change Scotland's smoking culture alone. We will be responding to the recommendations by the Smoking Prevention Working Group in detail separately but wish to state our concern that no representative from the retail industry was part of the working group or able to contribute in any meaningful way. This anti-business approach belies the suggestion that Scottish Ministers engage with all stakeholders equally. SGF works hard to promote responsible retailing to all our members, consults individuals and organisations on the content of our responses to issues of public concern and supports retailers to understand and meet their social and legal responsibilities. Only by viewing industry as part of the solution to these challenges can there be any reasonable hope of effecting long lasting change.

Yours sincerely



John Drummond