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Date 13 February 2007
Your Ref
Our Ref SB/JL/JB

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rec'd ispa

Dear Mr Glen

**CONSULTATION ON SMOKING PREVENTION WORKING GROUP REPORT:
TOWARDS A FUTURE WITHOUT TOBACCO**

Thank you for giving our organisation the opportunity to comment on this important topic. Our response to the consultation document is as follows:

This is a useful and thoughtful document and we support the direction and lead given by Scotland on this subject. The issues around reducing smoking also need to be cross-Border as much of the media is UK-wide rather than local, and perhaps greater emphasis on UK co-operation needs to be higher on the agenda.

We agree with all the recommendations, particularly those about the need to support continuing surveys for 13 and 15 year olds (recommendation 3), licensing vendors (recommendation 6), raising the legal age for purchasing tobacco products (recommendation 7) and urging the UK government to raise tobacco tax at a rate faster than inflation (recommendation 8).

The role of additives employed by the tobacco industry need to be recognised and discussed. These include such approaches as adjusting the pH of the smoke so that the nicotine is more bioavailable (and hence addictive), adding small amounts of menthol so that the throat is slightly anaesthetised and children are less likely to cough and splutter at their early attempts at smoking, and also adding familiar flavourings such as chocolate to make smoke more appealing to children. At the very least, cigarette manufacturers should be forced to describe the additives that are used and why, on each packet. There should perhaps be a differential taxation system based on such additives, so that the cigarettes that are plainly aimed at the novice smoker would be taxed more heavily. This would have the effect of discouraging the uptake of smoking whilst giving slightly less effect on the older generation who are already addicted and are unlikely to be able to give up.



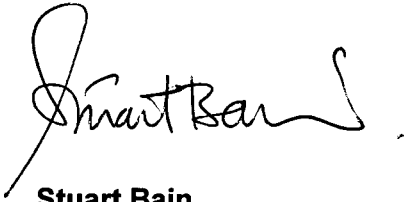
Chairman David Campbell CBE
Chief Executive Stuart Bain

*NHS National Services Scotland is the common name of the
Common Services Agency for the Scottish Health Service.*

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If you require clarification on any of our comments, Dr James Chalmers, Consultant in Public Health Medicine, Information Services, will be pleased to help. He can be contacted on 0131 275 6136.

Yours sincerely

A handwritten signature in black ink that reads "Stuart Bain". The signature is written in a cursive style with a large initial 'S' and a long horizontal stroke at the end.

Stuart Bain
Chief Executive