Protecting Children from Tobacco

A NSW Government Discussion Paper on the Next Steps to Reduce Tobacco-Related Harm

2008
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Foreword

One in two lifetime smokers will die from their habit; and a third of those deaths will occur in middle age. This is a future few parents would wish for their children.

Yet research shows that over 20% of 12 to 17 year old students in NSW have smoked tobacco in the past twelve months, and over 10% consider themselves smokers.

The teenage years are the most common time for taking up smoking, with 80% of current smokers saying they began before age 20. And the earlier one takes up smoking, the harder it is to quit. Already by the age of 20, more than 80% of smokers wish they had never started, having underestimated the addictive power of nicotine.

We must help our next generation of young people make better choices about their health.

The NSW Government is exploring a number of policy options to reduce young people’s exposure and access to tobacco. A key aim in all of these options is to ‘de-normalise’ smoking – to make it more and more the exception, rather than just simply accepted.

Some of the options canvassed in this paper may be controversial. Always with tobacco, there are competing health and business interests.

That’s why it’s time for the whole community to have its say.

The Government wants to hear from you. Which of the policy options in this Discussion Paper do you support? Where do you think the right balance on tobacco laws is? And what ideas do you have to help us stop the harm caused to our community by smoking?

Together, we can prevent our children being tempted by a habit that will lead to addiction and cut years off their lives.

I look forward to your contribution to this debate.

Verity Firth MP
Minister
Background

**Harm of tobacco smoking**

Tobacco is the leading cause of preventable death and disease in the NSW community.\(^1\) Smoking increases the risk of many cancers, and is also a major cause of chronic obstructive pulmonary disease and ischaemic heart disease.\(^2\) Indeed, tobacco affects almost every organ in the body.

Smoking is responsible for over 6,500 deaths in NSW each year.\(^3\) It is estimated that 11.7% of all deaths in Australia are attributable to tobacco.

The uptake of smoking by young people is of concern as the earlier the initiation of smoking, the earlier the risk of smoking-related disease.\(^4\) Furthermore, the age a person starts smoking is also an important predictor of success in quitting. The younger a person is when they start to smoke, the less likely it is that they will ever cease.

It has been estimated that in 2004/05, 149 Australians died as a result of exposure to environmental tobacco smoke.\(^5\) Of these, 36 are estimated to be children under the age of 15 years.\(^5\)

**Financial impacts of smoking**

The NSW Chief Health Officer’s report shows that smoking-related illnesses accounted for 55,591 hospital admissions in NSW in 2004-2005.\(^3\)

A 2005 report prepared for NSW Health estimated that in 1998-1999, the social cost of tobacco use in NSW was about $6.6 billion.\(^6\) This figure included the tangible costs of tobacco use such as net labour costs to the workforce and household, health care costs, fires and resources used in tobacco consumption as well as intangible costs which arise as a result of the high level of premature mortality caused by smoking.

**Smoking Prevalence in NSW**

Smoking rates in NSW have been declining in recent years. In the 2007 NSW Population Health Survey, 18.6% of people aged 16 years and over reported that they were current smokers (daily or occasionally),\(^7\) compared to 24.0% in 1997.\(^1\) A survey of NSW secondary school students in 2005 indicated that 8.4% of students aged between 12 and 17 years had ‘recently’ smoked (smoked in the last seven days) and that 10.3% of students were ‘current’ (that is heavy, light or occasional) tobacco smokers.\(^8\) Of these current smokers, 21.3% thought that they were addicted to tobacco.\(^8\)


Policy Context

Reducing smoking in NSW is a key commitment of the NSW Government. The target within the State Plan is to continue to reduce smoking rates by 1% each year to 2010, then by 0.5% each year to 2016.

The NSW Government has formalised its commitment to the prevention and reduction of tobacco-related harm in NSW through the *NSW Tobacco Action Plan 2005-2009* and its response to a previous Parliamentary Inquiry into the issue. NSW Health, the Cancer Institute NSW and non-government organisations work in partnership to address new challenges through a comprehensive range of tobacco control initiatives. Key to the comprehensive approach in NSW has been sustained campaign efforts reminding smokers of the benefits of quitting, as well as legislative reforms to protect the community from environmental tobacco smoke.

It is recognised however, that the NSW Government must have an even greater responsibility to protect children and young people. This protection needs to take the form of minimising the numbers of young people who take up smoking, as well as protecting children and young people from other peoples’ smoke.

Legislation in conjunction with comprehensive education campaigns are effective at reducing tobacco use among young people and influencing community behaviour and attitudes towards smoking. The enforcement of legislation aims to restrict young people accessing tobacco products, whilst the educational programs inform current smokers and young people about the health consequences of smoking.

In NSW it is illegal to sell to or buy tobacco products for people under the age of 18 years. In NSW, activities are routinely carried out to monitor retailer compliance with tobacco related legislation, such as ensuring that retailers don’t sell cigarettes to children. Recent amendments to the *Public Health Act 1991* further strengthen measures already in place to prevent young people from taking up smoking. These include banning the sale of sweet, fruit or confectionery flavoured tobacco products that may encourage children to smoke, and banning the sale of tobacco products from mobile or temporary premises including at events targeted at young people such as music festivals.

There are also a number of educational campaigns in place. These include the ongoing social marketing mass media campaigns run by the Cancer Institute NSW, as well as school based programs such as *Smoking Don’t Be A Sucker*, and other educational strategies to reduce the numbers of parents smoking around their children, be it in the home or car.

Since its introduction, the *Smoke-free Environment Act 2000* has progressively banned smoking in enclosed public places, thereby, reducing the community’s exposure to environmental tobacco smoke. This Act will continue to be enforced and its effectiveness monitored. This Discussion Paper however, aims to explore other reforms that could be implemented to address tobacco related harm, particularly with regard to children and young people.
Purpose of the Discussion Paper

With the *Smoke-free Environment Act 2000* now fully implemented, the NSW Government is looking to the next steps to reduce harm caused to the community from tobacco smoking. The Government is particularly interested in new measures to prevent the next generation of young people from taking up smoking.

A number of reforms have been suggested that might be effective in reducing the prevalence and uptake of smoking in young people in NSW.

This Discussion Paper has been prepared to assist interested parties in putting forward a submission as part of the public consultation process. This Discussion Paper provides background information on each of the proposed reforms, and some of the pros and cons of each of these approaches. The pros and cons put forward in this Discussion Paper are not exhaustive and do not necessarily represent the views of the NSW Government.

This Discussion Paper is a true consultation document and no decisions have been made on any of the measures discussed here. This consultation will assist the Government in determining future tobacco control measures for NSW.

Submission details

Community members, industry groups and stakeholders are encouraged to comment on the options raised in the Discussion Paper either electronically, or by completing the hardcopy submission form. A broad public consultation process such as this ensures the Government hears the range of views expressed by the community, industry and all stakeholders.

The Discussion Paper is available electronically from the NSW Health website (www.health.nsw.gov.au). Alternatively, printed copies may be obtained from the NSW Department of Health by telephoning 1800 357 412 or alternatively emailing tobacco@doh.health.nsw.gov.au.

A form has been developed to assist people to make a submission. An electronic submission form is accessible from the NSW Health website. Hard copy submission forms will also be accepted.

All submission forms must include the name, an electronic or postal address and the home postcode of the person or organisation putting forward the submission. Anonymous submissions will not be considered.

To participate in this public consultation, submissions must be received by 5.00pm on Sunday 22 June 2008.

Electronic submissions
Hardcopy submissions
Written submissions can be sent to:

‘Protecting Children from Tobacco Consultation’
C/- Centre for Health Advancement
NSW Department of Health
Locked Mail Bag 961
North Sydney NSW 2059

Or by email to: tobacco@doh.health.nsw.gov.au. Please include ‘Protecting Children from Tobacco Consultation’ in the subject line of the email.

Or by hand to: The reception desk, Ground floor, 73 Miller Street North Sydney. Please mark your submission ‘Protecting Children from Tobacco Consultation’, attention to the ‘Centre for Health Advancement’.
Option 1: Banning smoking in cars in which a child is present

Current situation
Children are particularly susceptible to health damage caused by inhaling environmental tobacco smoke (ETS), to which they are exposed. The primary reason for this increased susceptibility is that children’s bronchial tubes are smaller and their immune systems are less developed, making them more likely to develop respiratory and ear infections when exposed to ETS. Furthermore, because children have smaller airways, they breathe faster than adults and consequently breathe in more harmful chemicals than an adult would in the same amount of time.

According to the National Health and Medical Research Council, the negative health effects related to children’s exposure to ETS include: asthma and the worsening of symptoms of asthma; lower respiratory tract infections such as pneumonia and bronchitis; coughing and wheezing; and Sudden Infant Death Syndrome.

Some gains have been achieved through an educational approach to this issue. The NSW Department of Health and the Cancer Council NSW conducted a public education campaign to increase awareness among parents and carers of the dangers of environmental tobacco smoke for their children. This campaign known as the Car and Home: Smoke Free Zone resulted in a 55.7% increase across NSW in the number of smoke-free homes. However, despite the campaign, the survey showed that nearly 10% of smokers continued to smoke in vehicles in which children travelled.

If NSW were to ban smoking in cars with children it would not be the first Australian state to take action, as South Australia and Tasmania already have such legislation in place. Similar bans on smoking in vehicles in which children are present exist in the United States jurisdictions of Arkansas and Louisiana and some Canadian provinces.

How it could work
It would be an offence for the driver of a motor vehicle to allow a person to smoke in the vehicle if there was a child under the age of 18 years present.

Some arguments for
Banning smoking in cars where children are present would potentially:

- Reduce children’s exposure to environmental tobacco smoke in a common, confined setting;
- Send a powerful message to parents about the detrimental health effects of children being exposed to environmental tobacco smoke;
- Protect children from involuntary exposure to environmental tobacco smoke; and
- Further contribute to making smoking not a social norm.
Some arguments against
Banning smoking in cars where children are present would potentially:

- Be perceived as excessive regulation and as impinging on civil liberties of people in a private setting;
- Be difficult to enforce; and
- Divert resources from other law enforcement activities.
Option 2: Putting tobacco products out of sight in retail outlets

Current situation
As previous avenues for tobacco advertising and promotion have become more tightly regulated, the visual presence of the cigarette packet in the retail outlet has become a major focus for tobacco marketing activities. Currently, tobacco products must be displayed in a sales unit, with a limit of two packet faces for each brand variation. Nonetheless, the display of tobacco products remains a visible feature of many supermarkets, service stations, convenience stores, newsagents and other retail outlets.

Research suggests that tobacco displays can influence children’s perceptions about the availability and accessibility of cigarettes in their community, while also making it harder for intending quitters to quit.

Health authorities around the world have begun to legislate for tighter controls on the display of tobacco products in retail outlets. The majority of Canadian provinces and territories now either have in place, or are introducing legislation to move tobacco point-of-sale displays out of sight. Iceland and Thailand have legislated to ban all tobacco displays.

In Australia, legislation has been passed in Tasmania to remove tobacco products out of public view by February 2011. Further, on 6 March 2008 the Tobacco Amendment Bill 2008 was introduced into the ACT Legislative Assembly. The Bill provides amongst other things the prohibition of all tobacco products from point of sale displays.

How it could work
Retailers of tobacco products would be required to store tobacco products out of public sight. Provisions would allow retailers to display limited information about the availability and pricing of these products.

Some arguments for
Banning the display of tobacco products, and putting them out of sight would potentially:

- Reduce the likelihood of children and young people seeing cigarettes and wanting to experiment with them;
- Change young people’s perceptions about ease of access to cigarettes and social acceptability of smoking;
- Assist intending quitters by removing a visual stimulus to smoke and to purchase cigarettes;
- Assist former smokers not to relapse;
- Further denormalise smoking in the community and reinforce key health messages;
- Remove the last remaining major avenue for tobacco companies to advertise and promote their products; and
- Simplify compliance and enforcement.
Some arguments against
Banning the display of tobacco products, and putting them out of sight would potentially:

- Result in costs associated with changing the displays;
- Reduce retailers’ sales of tobacco products and hence profits;
- Limit the capacity of tobacco companies to introduce new lines; and
- Place the greatest burden on specialist tobacconists.
Option 3: Introducing a licensing scheme for tobacco retailers

Current situation
The NSW Government has previously committed to a notification system requiring tobacco retailers to inform NSW Health of the location of their premises. However, the necessary amendments have not yet been made to the Public Health Act 1991. These amendments will assist health authorities with compliance monitoring activities with tobacco laws, such as existing display restrictions and the ban on sales to minors.

Currently, the only avenue to penalise retailers caught in breach of tobacco laws is through prosecution which may result in a criminal conviction and a fine. The ability to remove a license to sell tobacco following convictions for sales to minors or other offences could prove to be a significant deterrent for tobacco retailers.

Several Australian states and territories have introduced tobacco-licensing systems. The types of licensing systems implemented vary from only retailers to the inclusion of wholesalers. Some states have a licensing system that requires retailers to apply for and annually renew their license with an associated licensing fee. Whilst other states have provisions whereby retailers may be prohibited from selling tobacco products if found guilty of selling these to young people.

How it could work
A licensing scheme could be introduced so that the Government would know where all vendors of tobacco products were, and have the power to cancel their licence should there be non-compliance with tobacco related legislation.

Some arguments for
A licensing scheme for tobacco retailers would potentially:
- Provide an increased deterrent to the sale of tobacco products to children and prevent advertising breaches;
- Enable the delivery of education and information to all retailers of tobacco products and therefore assist retailers to be aware of their legal responsibilities; and
- Assist with compliance monitoring.

Some arguments against
A licensing scheme for tobacco retailers would potentially:
- Impose direct and indirect costs on retailers; and
- Increase administrative burden for retailers and Government.
Option 4: Additional proof of age requirements for purchasing tobacco products

Current situation
In Australia, all states and territories have legislation in place prohibiting the sale of tobacco products to people under the age of 18 years. It is recommended that retailers should routinely check proof of age identification for customers purchasing tobacco products, who appear to be under 25 years of age; however, this is not currently a legal requirement.

Age restrictions also apply when purchasing alcohol. It is understood that some liquor retailers have a system whereby they ask customers purchasing alcohol for identification if they look under 25 years of age, as part of their responsible service of alcohol.

How it could work
Retailers would be required to ask all customers that appeared under 25 years of age for identification if intending to purchase a tobacco product.

Some arguments for
Requesting proof of age for people who appear under 25 years of age would potentially:
- Reduce the likelihood of minors purchasing tobacco products; and
- Lead to the denormalisation of smoking.

Some arguments against
Requesting proof of age for people who appear under 25 years of age would potentially:
- Place an increased burden upon retailers requiring them to ask a larger proportion of their customers for identification.
Option 5: Restrictions on employees under 18 years of age from selling tobacco products

**Current situation**
Employees under 18 years of age are currently allowed to sell tobacco products in NSW retail outlets. There is anecdotal evidence from compliance monitoring activities that some sales people under the age of 18 years do sell tobacco products to minors. It is also possible that young people may feel coerced into selling cigarettes to their peers.

Australia has ratified the World Health Organization Framework Convention on Tobacco Control including article 16(7), which recommends prohibiting the sale of tobacco products by persons under the age of 18 years. However, no state or territory in Australia has implemented such legislation. Other countries, such as Singapore and Norway, do prohibit the sale of tobacco products by persons under the age of 18 years.

**How it could work**
Employees under the age of 18 years would not be permitted to sell tobacco products in retail outlets.

**Some arguments for**
Restricting employees under 18 years of age from selling tobacco would potentially:
- Decrease the illegal sale of tobacco products to minors;
- Increase consistency in approach with current legislation prohibiting tobacco sales to minors;
- Reduce the exposure of employees under 18 years of age to tobacco products;
- Increase consistency with current legislation whereby minors are prohibited from selling alcohol; and
- Reduce peer pressure to sell tobacco products to young people.

**Some arguments against**
Restricting employees under 18 years of age from selling tobacco would potentially:
- Increase the difficulty of young people obtaining employment if they are not permitted to sell tobacco products; and
- Impose difficulties on small businesses run by families.
Option 6: One point of sale for tobacco in retail outlets

Current situation
In NSW there is legislation restricting how tobacco products can be displayed. In 2006 the Joint Select Committee on Tobacco Smoking in NSW recommended that this legislation be enhanced by allowing only one point of sale for tobacco per venue.

In Australia, a number of jurisdictions have restrictions in place on point of sale for tobacco products by retailers. These are separate restrictions to the number and size of tobacco displays in premises.

How it could work
Retailers of tobacco products could be restricted to only one point of purchase in their premise. For example, supermarkets would not be permitted to sell cigarettes from each check-out.

Some arguments for
One point of sale for tobacco products in retail outlets would potentially:
- Make it easier for retailers to display the Public Health Act Notice with regards to sales to minors;
- Make it easier to ensure that all vendors of tobacco are appropriately trained in their responsibilities regarding tobacco sale, particularly requirements to check proof of age;
- Reduce the number of sales people exposed to tobacco products; and
- Simplify monitoring of compliance with tobacco legislation.

Some arguments against
One point of sale for tobacco products in retail outlets would potentially:
- Create inconvenience for smokers; and
- Reduce profits to some retailers.
Option 7: Banning tobacco sales from vending machines

Current situation
Tobacco vending machines are permitted in restricted areas of licensed premises and dedicated staff amenity areas in workplaces. The restriction of vending machines to certain areas of licensed premises allows a certain level of protection from young people purchasing tobacco products in this way. This same level of protection does not extend to vending machines in staff amenity areas. The generally unsupervised nature of vending machines means that children and young people may consider these an easier option to obtain cigarettes.

In Australia, some states have legislation in place whereby members of the public cannot operate vending machines to access tobacco products.

How it could work
Vending machines for the sale of tobacco products would no longer be permitted.

Some arguments for
Banning vending machines would potentially:
- Reduce minors’ access to tobacco products;
- Assist intending quitters by removing a visual stimulus to smoke and to purchase cigarettes;
- Assist former smokers not to relapse; and
- Further denormalise smoking in the community and reinforce key health messages.

Some arguments against
Banning vending machines would potentially:
- Place a burden upon licensed premises;
- Impact on profits made by companies supplying and stocking vending machines; and
- Lead to a loss of revenue from vending machines.
Option 8: Banning tobacco products in shopper loyalty programs

Current situation
In NSW it is an offence to distribute or supply free tobacco products. However, it is not an offence for tobacco products to be included in retailer shopper loyalty programs. These programs may provide an incentive to customers to purchase smoking products from a particular retail outlet in order to receive customer benefits. Such prohibitions are in place in Queensland and the Tobacco Amendment Bill 2008, which was recently introduced into the ACT Legislative Assembly, includes a similar ban.

How it could work
Tobacco products would no longer be permissible for inclusion in shopper loyalty programs. Points would not be accrued when tobacco products are purchased, and points could not be redeemed for tobacco products.

Some arguments for
Banning the inclusion of tobacco products in shopper loyalty programs would potentially:
  • Result in no incentives or rewards being provided to customers for purchasing tobacco products.

Some arguments against
Banning the inclusion of tobacco products in shopper loyalty programs would potentially:
  • Increase the burden on retailers to exclude tobacco products from such schemes.
National strategies to reduce tobacco related harm

The Commonwealth takes a leadership role in the overarching policy for tobacco control in Australia under the *National Tobacco Strategy 2004-2009*. This strategy is a statement of resolve by Federal, State and Territory Governments to improve health and reduce social costs caused by tobacco.

The Commonwealth has a range of specific tobacco regulatory responsibilities. These include: the regulation of tobacco products through trade practices legislation; the prohibition of sponsorship and advertising of tobacco products; the regulation of tobacco packaging, including cigarette contents and graphic health warnings on cigarette packs; and the regulation of taxes on tobacco products.

While the focus of this Discussion Paper is on what NSW can do, it is recognised that there are a number of reforms outside the control of the NSW Government that would further protect children in NSW from tobacco. A key example is the price of tobacco products, as increasing the price is a key strategy for reducing young people’s consumption (particularly as children generally have lesser finances at their disposal). Another area outside the control of the NSW Government is Internet sales of tobacco products. Further controls in this regard may also protect children and young people, who are high users of this technology.

As mentioned above, the Commonwealth is responsible for legislation around tobacco packaging. There may be further opportunities to decrease the attractiveness of tobacco products by introducing generic packaging. Similarly, reducing children’s exposure to tobacco products in movies (where the celebrities are seen smoking) may be another measure to reduce the desirability of smoking to children and young people.

Your feedback to the NSW Government on national measures that could be taken will help inform the position the NSW Government takes in discussions about the national tobacco strategy with the Federal Government.
Submission to the 2008 Discussion Paper
Protecting Children from Tobacco

Details of the person putting forward the submission

Name:

Mailing Address:

Postcode:

Email address:

Note: All submission forms must include the name, an electronic or postal address and the home postcode of the person or organisation putting forward the submission. Anonymous submissions will not be considered.

Is your submission on behalf of an organisation or professional association?  □ Yes  □ No

If yes, which organisation or professional association?

_____________________________________________________________________

If no, then please indicate if you are:
(tick as many as apply)

□ a person under the age of 18

□ an owner of a retail business that sells tobacco products

□ an employee of a retail business that sells tobacco

□ a health or medical professional

□ a teacher or youth worker

□ other (please specify) ____________________________
Option 1
Do you support banning smoking in cars where children under the age of 18 years are present?
☐ Support
☐ Don’t support

*Please provide reasons for this:*
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Option 2
Do you support removing tobacco product displays out of sight in retail outlets?
☐ Support
☐ Don’t support

*Please provide reasons for this:*
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Option 3
Do you support the introduction of a licensing scheme for tobacco retailers?

☐ Support
☐ Don’t support

*Please provide reasons for this:*
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Option 4
Do you support retailers being required to ask all customers that appear under 25 years of age for identification if intending to purchase a tobacco product?

☐ Support
☐ Don’t support

*Please provide reasons for this:*
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Option 5
Do you support having restrictions on employees who are under 18 years of age from selling tobacco products?
☐ Support
☐ Don’t support

*Please provide reasons for this:*
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Option 6
Do you support limiting retail outlets to one point of sale for tobacco products?
☐ Support
☐ Don’t support

*Please provide reasons for this:*
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Option 7
Do you support banning tobacco sales from vending machines?

☐ Support
☐ Don’t support

*Please provide reasons for this:
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Option 8
Do you support banning tobacco products from inclusion in shopper loyalty programs for example where accumulating points results in gifts or benefits for example fuel discount vouchers?

☐ Support
☐ Don’t support

*Please provide reasons for this:
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National Strategies

Do you have any other reform options that are the responsibility of the Commonwealth that you would like to put forward?

☐ Yes
☐ No

*If Yes, please provide details below:*

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Additional comments

Do you have any other issues that you would like considered which relate to protecting children and young people from tobacco-related harm?

☐ Yes
☐ No

*If Yes, please provide details below:*

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To participate in this public consultation, submissions must be received by 5.00pm on Sunday 22 June 2008.

**Electronic submissions**
Visit www.health.nsw.gov.au and follow the links to the submission form.

**Hardcopy submissions**
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‘Protecting Children from Tobacco Consultation’
C/- Centre for Health Advancement
NSW Department of Health
Locked Mail Bag 961
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Or by hand to: The reception desk, Ground floor, 73 Miller Street North Sydney. Please mark your submission ‘Protecting Children from Tobacco Consultation’, attention to the ‘Centre for Health Advancement’.
References


