

Paul Webbewood  
Department of Health  
Wellington House  
133-155 Waterloo Road  
London  
SE1 8UG

21 August 2002

Dear Paul,

Re: Proposed European Directive on tobacco advertising and sponsorship – inclusion of cigarette papers

The National Heart Forum is committed to tackling the heavy toll of coronary heart disease caused by smoking. We therefore welcome the opportunity to comment on proposals to ban tobacco advertising and sponsorship as an important measure to reduce smoking rates in the UK and other EU member states. We are pleased to note that the Department acknowledges the growth in the use of hand rolling tobacco and its willingness to address the issue.

We should like to make the following points:

1. The Department and the EU should adopt a precautionary approach to advertising by cigarette paper manufacturers, such as Rizla. The government rightly accepts that tobacco advertising increases consumption as well as influencing brand choice, and there is no reason not to assume that Rizla advertising has the same effect on consumption of hand rolled tobacco. Since any increase in tobacco consumption will mean more deaths and illness from tobacco-related disease, we believe a precautionary approach is justified.
2. The arguments for restricting advertising on cigarette papers can equally well be applied to a number of other branded products including smokers' matches, lighters, and cigarette rolling machines. We recommend that the wording in the directive covers this *category of promotion*.
3. The restrictions should also be specified in the anticipated UK legislation to ensure consistency with EU legislation. The current Tobacco Advertising and Promotion Bill does not include cigarette papers or other branded smokers' products.
4. This important consideration on cigarette paper advertising raises the very important problem of *indirect advertising* for other tobacco-branded merchandise. The exclusion of measures to control indirect advertising in the draft Directive is a serious omission and we urge the Department to press for its inclusion in the final Directive.

Yours sincerely,

Jane Landon  
Associate Director

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