



**National Council of  
Women of New Zealand**

Te Kaunihera  
Wahine O Aotearoa

**National Office**  
Level 4 Central House  
26 Brandon Street  
PO Box 25-498  
Wellington 6146  
(04) 473 7623  
[www.ncwnz.org.nz](http://www.ncwnz.org.nz)

22 February 2008

S08.05

**Submission to the Ministry of Health on the Future of Tobacco Displays in New Zealand**

<b>Name/name of organisation making submission</b>	<b>National Council of Women of New Zealand</b>
<b>Contact details</b>	PO Box 12 117 Thorndon Wellington 6144





<b>Opening comments:</b>	<p>NCWNZ is an umbrella organisation representing 47 Nationally Organised Societies and National Members. It has 28 branches throughout the country attended by representatives of those societies and some 150 other societies. It also has three satellite groups and three regional consultation groups. NCWNZ is representative of approximately 350,000 women via its affiliated bodies. The Council's functions are to serve women, the family and the community at local, national and international levels through research, study, discussion and action.</p> <p>NCWNZ welcomes the opportunity to consider this consultation document on the Review of Tobacco Displays in New Zealand. In recent years NCWNZ has made a number of submissions on this subject, the last being the updating of the law controlling tobacco displays in 2003 to the Ministry of Health, as part of the Smoke-free Environment's Amendment Act.</p> <p>The NCWNZ Board has also confirmed its support of the campaign initiated and promoted by the Cancer Society, to ban all cigarette displays.</p> <p>A resolution passed by NCWNZ in 1872 had, in view of the proven link between cigarette smoking and lung cancer, asked the Minister of health to introduce legislation which would prohibit all advertising and promotion of cigarettes.</p> <p>A further resolution passed by NCWNZ in 1875 opposed any extension of advertising of cigarettes in the media.</p> <p>The responses to the questions circulated in this 'Review of Tobacco Displays' document from NCWNZ members continue to reflect these resolutions and policies.</p> <p>This submission has been prepared by the Consumer Affairs Standing Committee following consultation with the wider membership throughout New Zealand. NCW member responses are detailed in the accompanying questionnaire provided with the Consultation Document.</p>
--------------------------	--

### Comments on proposed options

#### Option 1: Current restrictions with enhanced education and enforcement

<b>Would you support this option?</b>	Yes <input type="checkbox"/> and No <input type="checkbox"/>
---------------------------------------	--



<p><b>If yes, why? If no, why not?</b></p>	<p>Members' responses reflected varied viewpoints. Those who considered <i>all</i> displays of tobacco products should be banned did not fully support this option.</p> <p>A majority supported an increase in education and monitoring to aid the banning of displays and/or enforcing compliance at retail outlets, particularly dairies and service stations. Responses considered enhanced retailer education may increase compliance to current regulations but not protect children and smokers wishing to quit.</p> <p>Also the feedback from members expressed concern that this option does not address the objective of the Smoke-free Environment Act 1990, and undermines the health message.</p>
<p><b>What possible advantages or disadvantages do you see with this particular option?</b></p>	<p><b>Advantages:</b></p> <p>A few responses considered that advantages of supporting this option gave adults the right to see tobacco products displayed and the right to choose the product they wish to buy. Some members felt that tobacco companies have a right to advertise their goods despite the effects on consumers' health.</p> <p>Smoking is not illegal. There would be no increased costs for education to the retailer and monitoring and enforcement would be beneficial.</p> <p><b>Disadvantages:</b></p> <p>Recent research clearly shows that tobacco displays provide a "trigger" to purchase for vulnerable customers and undermines attempts to quit smoking and may encourage some to restart. Other concerns expressed by members included:</p> <ul style="list-style-type: none"> <li>• Displays are a means of advertising and the Act prohibits tobacco product advertising.</li> <li>• Incentive payments to retailers may influence stock purchase and display size and location if current restrictions continued to be enforced.</li> </ul>

**Option 2: Further restrictions**

- Further limit the maximum size of tobacco displays.
- Limit the number of tobacco displays to one display per retail outlet.
- Require graphic health-warning posters to be displayed.

<p><b>Do you support any of these options?</b></p>	Yes <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/> and No <input style="width: 30px; height: 30px; border: 1px solid black;" type="checkbox"/>
--	--



<p><b>If yes, why? If no, why not?</b></p>	<p>The option to further limit the size of tobacco displays or limit the number of displays, received little feedback or support as members generally endorsed option 1 and/or option 3.</p> <p>Many responses did support the requirement for graphic health warning posters to be displayed in all retail outlets, whether tobacco displays are subsequently banned or not.</p> <p>Members supported restriction to the number of locations where tobacco can be purchased to one check-out per retail outlet, should option 3 not become law.</p>
<p><b>Would you like to see some of the above options combined?</b></p> <p style="text-align: right;">Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>For example, only one tobacco display per retail outlet <i>and</i> this display to include a graphic health-warning poster.</p>	
<p><b>What possible advantages or disadvantages do you see with these options?</b></p>	<p>If further restrictions were the favoured option, then members would support a combination of limiting tobacco displays to one display and a requirement to display graphic health warning posters. These have been already demonstrated to be effective. The addition of the Quitline telephone number on all posters in display areas, at eye level and unobstructed, received strong support from members (recommended by the Cancer Society).</p> <p>Members considered that restricting the number of locations where tobacco can be bought would minimise the exposure of young people to tobacco sales. However, this would not address the issue in small dairies. Comments from members conveyed the message that tobacco displays, even if reduced in number and size, are still an effective marketing device and promote a product harmful to public health. Vulnerable customers would still be exposed to displays.</p>



**Option 3: Ban on tobacco displays**

- Ban tobacco displays in areas accessible to under-18s.
- Completely ban all tobacco displays.

<p><b>Do you support either of these options?</b></p> <p>Ye <input checked="" type="checkbox"/> No <input type="checkbox"/> s <input type="checkbox"/></p>	
<p><b>If yes, why? If no, why not?</b></p>	<p><b>Yes</b></p> <p>A complete ban of tobacco displays is favoured by the majority of members as this is considered to be more likely to be effective in reducing consumption. A complete ban would support other efforts to prevent the uptake of smoking and increase cessation attempts, if tobacco products “out of sight” and will also avoid brand recognition. Children and young people would not be exposed to tobacco displays and hopefully smoking initiation. Advertising is known to influence young people in particular and addiction starts early in life.</p>
<p><b>What possible advantages or disadvantages do you see with these options?</b></p>	<p><b>Advantages</b></p> <p>Responses conveyed many viewpoints and opinions concerning the 4 advantages of a complete ban of tobacco displays, e.g.</p> <ul style="list-style-type: none"> <li>• supports public health message;</li> <li>• easier compliance;</li> <li>• no retailers disadvantaged;</li> <li>• easier to enforce than limited restrictions;</li> <li>• simple for retailers and public to understand.</li> </ul> <p><b>Disadvantages</b></p> <p>May increase cost initially for retailers and make it difficult for smokers to know where to purchase cigarettes and what types of products are available. However, members considered that the negative effects would be outweighed by the positive outcomes. Costs could be minimised for retailers with funding assistance.</p>
<p><b>Which is your preferred option? Why?</b></p>	<p>Members agreed that their preferred option was a complete ban of tobacco displays as outlined above. It was generally felt that banning tobacco displays in areas accessible to under 18 year olds would be very difficult to manage in most retail outlets and difficult to enforce, although it may have some positive effects if successfully controlled. A complete ban would bring tobacco retailing into line with the prohibition of other tobacco advertising and sponsorship.</p>



<b>Is there anything else you would like to comment on?</b>	<p>Members recommended that more help and resources should be available to support those wishing to cease smoking.</p> <p>Members raised two issues:</p> <ul style="list-style-type: none"><li>• duty free retail outlets, and</li><li>• how cigarette vending machines would be controlled.</li></ul> <p>Members also commented that continuing public health promotions was considered important and essential to convey the anti-smoking message.</p>
---	--

## Conclusion

The majority of NCW members who responded support a complete ban on retail displays of tobacco products. There was also considerable support for increased education for retailers and increased enforcement operations if current restrictions should continue.

Responses indicated strong support for graphic health warning posters to be displayed wherever tobacco products are sold. It was further recommended posters be displayed whether tobacco products are visible or under the counter and not on display. This would provide a consistent message that tobacco products are dangerous and addictive.

NCW NZ thanks the Minister and the Ministry of Health for the opportunity to provide feedback on the review of tobacco displays in new Zealand so that the views of our members may be taken into account in the decision making process.

Christine Low  
**National President**

Jan Brown  
**Convener, Consumer Affairs Standing Committee**