



5 November 2020

Dear Sir/Madam,

RE: Statutory Review of the Western Australian *Tobacco Products Control Act 2006*

The Collaboration for Evidence, Research and Impact in Public Health (CERIPH), School of Public Health, Curtin University welcomes the opportunity to contribute to the statutory review of the Western Australian *Tobacco Products Control Act 2006* (the Act) and endorses the submission provided by the Cancer Council of Western Australia.

CERIPH is a multi-disciplinary research centre within the School of Public Health, formerly known as the Western Australian Centre for Health Promotion Research (established in 1986). CERIPH seeks solutions that promote health, prevent disease and protect populations from harm, and we build individual and organisational capacity through our partnerships, applied research, education and workforce training. Recognising the complexity of health and its determinants, our multidisciplinary collaboration provides leadership and evidence to support action across educational, organisational, socio-economic, environmental and political domains to improve population health in our region

As the leading cause of preventable death and disease tobacco smoking continues to have a significant impact on the lives of too many Western Australians. We share Cancer Council WA's belief that nobody should live in poverty, be socially excluded or die early because of tobacco, but unfortunately smoking continues to have a significant impact on the lives of too many people who are affected by poverty, disadvantage and inequality.

We recognise the achievements that the State Government and the Department of Health WA have made in tobacco control and public health to date. However, while people continue to die prematurely from tobacco-caused disease we cannot afford to be complacent and need to take urgent action. As the first statutory review of the Act since 2011, CERIPH welcomes this thematic review as it is a timely opportunity to ensure that tobacco reform in WA is strengthened to further protect the health of all Western Australians.

In endorsing the submission provided by Cancer Council WA, CERIPH specifically acknowledges the importance of the following recommendations:

- Prohibiting the display of any form of price board at point of sale.
- Prohibiting the supply of certain novel and flavoured products.
- Prohibiting the supply of e-cigarettes and e-cigarette accessories.
- Prohibiting advertising and promotion of e-cigarettes and e-cigarette accessories.
- Enabling local governments to have some control over tobacco sales outlets within their jurisdiction by:
 - adding an explicit carve-out to enable local governments to enact local laws to prohibit or phase out the sale of tobacco within their Local Government area; and
 - allowing local governments to formally object to licence applications on specified grounds.
- Prohibiting the use of e-cigarettes in enclosed and outdoor public places in which tobacco smoking is prohibited under the Act or Regulations.
- Expanding smoke-free outdoor public places.

As per the submission provided by Cancer Council WA, we endorse these recommendations for the following reasons:

- Australia's tobacco smoking rates are continuing to decline (although at slower rates than previously); however, e-cigarette use is increasing.
- Changes such as reducing access to tobacco and other novel nicotine and tobacco products, reducing opportunities for promotion, and increasing smoke-free environments would contribute to a reduction in the consumption of tobacco and other novel nicotine and tobacco products by reducing opportunities to smoke, encouraging quitting activities, and preventing relapse by former smokers.
- Research we have conducted specifically supports these recommendations:
 - Motivations for use, identity and the vaper subculture: A qualitative study of the experiences of Western Australian vapers [1]
 - An investigation of the e-cigarette retail shop environment in Perth, Western Australia [2]
 - E-cigarette promotion on Twitter in Australia: Content analysis tweets [3]
 - E-cigarette advocates on Twitter: Content analysis [4]
 - E-Cigarettes: Implications for health promotion in the Asian Pacific Region [5]
 - The rise of e-cigarettes: implications for health promotion [6]
 - No smoking here: Examining reasons for noncompliance with a smoke-free policy in a large university [7]
 - An exploratory study of smokers and stakeholders expectations of the implementation of smoke-free policy in a university setting [8]

The growing body of evidence, community support and the significant impact that tobacco smoking continues to have on many Western Australians, particularly people who are socially disadvantaged, signifies the urgent need for legislative reform as a critical component of a comprehensive approach to tobacco control.

CERIPH is pleased to contribute a response to the statutory review of the Western Australian *Tobacco Products Control Act 2006* for the reasons provided in Cancer Council WA's submission. We urge the WA Government to give the above recommendations full consideration.

Should you wish to discuss this issue further, please do not hesitate to contact me.

Yours sincerely,



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References

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