

RECEIVED
INDCU

13 OCT 2023



Gardner House
Hornbeam Park
Harrogate
HG2 8NA

Suella Braverman
14 East Street
Fareham
Hampshire
PO16 0BN

Concerns and Objections to the 'Smokefree Generation' Policy Proposal

Dear Suella Braverman

I hope this letter finds you well. I am writing to express my profound concern and strong objection regarding the proposed 'Smokefree Generation' policy, which seeks to prohibit the sale of tobacco products to individuals born on or after 1 January 2009 in the United Kingdom. While I wholeheartedly acknowledge the critical importance of safeguarding public health and reducing the harms associated with tobacco, I believe this proposal has the potential to give rise to significant unintended consequences, most notably a surge in the black market for tobacco products, which could, in turn, pose serious public health risks.

The cornerstone of this proposal revolves around the restriction of legal avenues for purchasing tobacco products. While well-intentioned, this approach inadvertently opens the door for the illicit trade in these commodities. Historical evidence demonstrates that when lawful channels for obtaining tobacco are limited, consumers often turn to illicit sources. This not only endangers their well-being but also provides fertile ground for criminal activities to thrive. The emergence of an unregulated black market introduces the formidable challenge of monitoring the safety and quality of tobacco products, consequently heightening the risk of smoking-related illnesses.

Furthermore, the sale of unregulated, unlicensed tobacco products carries grave health risks for consumers. These products often lack adherence to essential safety standards and quality controls, thereby exposing individuals to potentially harmful substances and elevating the likelihood of smoking-related diseases. The absence of legal oversight within the black-market ecosystem poses an imminent threat to public health in the UK.

Considering these concerns, I implore you to consider a more comprehensive approach to tobacco control that effectively addresses the potential escalation of black-market activity. Such a holistic approach should encompass not only robust public awareness campaigns and

enhanced accessibility to smoking cessation programs but also the imposition of stringent regulations and penalties targeting the unlawful sale of tobacco products. By adopting these measures, we can effectively mitigate the associated risks of unregulated tobacco and more diligently safeguard public health.

Furthermore, during the COVID-19 lockdowns, a noteworthy phenomenon emerged: legal tobacco sales experienced a significant surge. This observation underscores the fact that when illegitimate means of procuring tobacco are curtailed, consumers naturally return to legal sources. Inadvertently, the 'Smokefree Generation' policy may exacerbate the issue by diminishing the legal supply of tobacco products, consequently amplifying the demand for illicit ones. This not only places individuals at peril but also contributes to the proliferation of criminal activities.

Additionally, I wish to draw attention to a substantial concern: the impact of reduced legal tobacco sales on the National Health Service (NHS) in the UK. As legal tobacco sales have decreased, the financial resources generated from tobacco duty have also dwindled. This has placed additional strain on the NHS, which continues to grapple with the same number of smoking-related health issues despite diminishing income. The NHS is already stretched thin, and we must consider the potential consequences of further reducing the revenue that funds crucial healthcare services.

At Barkers of Harrogate we are an independent family run tobacco wholesaler and importer specialising in cigars and pipe tobacco. Our main customer base is independent tobacconists in the UK. Already, family-run tobacconists that we provide for are grappling with the growing competition from the black market. Illicit sources of tobacco products have been steadily encroaching on our customer base, drawn by the allure of lower prices and accessibility. This has resulted in financial strain and an uncertain future. This proposal will effectively close all tobacconists, many of which are small businesses which have been running for generations.

Moreover, it is imperative that we respect the individual's right to make choices about their own lifestyle, including the right to smoke, just as individuals have the right to consume alcohol. The freedom to make decisions concerning one's own body and health should be upheld, and any policies aimed at limiting personal choices must be approached with caution and a profound respect for personal freedoms.

It is worth highlighting that while tobacco is subjected to ever-stricter regulations, alcohol, which some argue can have equally, if not more, detrimental effects, is subject to comparatively fewer restrictions. This prompts a pertinent question: where should we draw the line? Striking the right balance between safeguarding public health and respecting personal freedoms is a delicate challenge we must navigate.

Furthermore, it is imperative to acknowledge that, despite the existence of stringent laws and regulations, illegal drugs continue to persist in significant quantities within the UK. It is highly likely that if tobacco were to be banned, it would not vanish; instead, it might continue to circulate within the UK's borders, but under the radar, free from duty and taxes and devoid of necessary regulations.

In conclusion, while I wholeheartedly endorse the objective of reducing tobacco-related harm and safeguarding public health, I am deeply concerned that the 'Smokefree Generation' policy proposal may inadvertently lead to unforeseen consequences. These consequences include the growth of an unregulated black market for tobacco products and the heightened risks to public health. I earnestly request a re-evaluation of this proposal in favour of a more comprehensive, balanced, and effective approach to tobacco control that preserves public health without igniting unintended challenges, restrict personal freedoms and further burdening the NHS.

Thank you for your time and consideration.

Sincerely,

A large black rectangular redaction box covering the signature area.A black rectangular redaction box covering a line of text.A black rectangular redaction box covering a line of text.

Barkers of Harrogate