



Forest EU
Square de Meeûs 35
1000 Brussels, Belgium
+32 2 895 36 12
contact@forestonline.eu
forestonline.eu

Armenian Parliament
Members of the Armenian Parliament
19 Marshal Bagramyan str.
Yerevan 0095
Armenia

Brussels, 25 October 2019

Re: Tobacco Control Law

Dear Members of the Armenian Parliament,

We are writing to express the concerns of European adult smokers regarding the draft Tobacco Control Law approved by the Armenian Government on 12 September 2019 and expected to be reviewed by the Parliament.

Our EU campaign is particularly worried about its plain packaging provision, given that this type of regulation negatively impacts tobacco consumers.

In view of the upcoming discussions in the Parliament, we would like to underline that there is no credible evidence that plain or standardised cigarette packages would achieve the objective of further reducing smoking rates. Australia was the first country in the world to impose this measure, and data published by the government showed no substantial change in the decline of smoking rates. Similarly, data from the United Kingdom showed this measure had no statistically significant impact on smoking prevalence. Following its deployment in France, the French Health Minister declared that plain packaging “does not lead smokers to quit smoking”.

Furthermore, while plain packaging wouldn't give smokers additional information about the product they purchase, it would reduce consumer choice by making it almost impossible to differentiate products. Promoted by tobacco-control groups to increase shameful avoidant behaviours and achieve the denormalization of smoking behaviour, plain packaging unfortunately represents a way for governments to legally ostracize the smoking minority.

Finally, plain packaging would boost illicit trade and will thereby reduce government revenue. For example, in Australia, the market share of illegal tobacco is now 20% higher than before 2012. The measure would create an uncontrolled, unregulated, unaccountable market that circumvents regulatory controls, including where and to whom tobacco is sold, including underage people: criminals do not respect age restrictions. The Australian experience with plain packaging also shows there was no statistically significant reduction in youth smoking in the first year after its introduction. Moreover, just 3% of EU citizens think plain packaging is the most effective solution to reduce youth smoking rates, way below mandatory education in schools about the health risks of smoking (52%).

Therefore, we are calling on the Armenian Parliament to properly reflect on the draft Tobacco Control Law, take into account adult smokers' preferences and concerns and consider rejecting its plain packaging provision.

We thank you for your consideration and remain at your disposal to answer any questions you may have.

Yours sincerely,

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Guillaume Périgois
Director
Forest EU