



23 November 2016

Tobacco Control
Department of Health and Human Services
Via email: tobaccosellersfee@dhhs.tas.gov.au

RE: Increasing the Tobacco Licensing Fee

Thank you for extending us the opportunity to comment on the Draft *Public Health (Tobacco Seller's Licence) Regulations 2009*.

As the leading advocate for surgical standards, professionalism and surgical education in Australia and New Zealand, the Royal Australasian College of Surgeons (RACS) is committed to taking informed and principled positions on issues of public health at both state and federal levels.

Raising community awareness and minimising the harmful impacts of tobacco has been a key advocacy priority for RACS over many years. Tobacco use is known to cause certain cancers and increase the risk of other diseases and congenital abnormalities. Surgical outcomes are consistently poorer for smokers than non-smokers, with patients who smoke experiencing longer recovery times, increased risk of wound infection, and significantly increased risk for myocardial infarction and stroke. Smokers also have a higher post-surgery mortality rate than non-smokers.

In the past two decades, the percentage of Tasmanians that use tobacco has steadily decreased largely thanks to a number of state and federal government initiatives. These include; restrictions on the sale and supply of tobacco, increasing excise, limiting exposure to advertising, and government campaigns targeted at the cessation of smoking. As noted in the Regulatory Impact Statement, since 2002 tobacco licences in Tasmania have fallen between 2 to 6 per cent annually. This includes a 17 percent reduction in licenses in 2013, following added restrictions being placed upon the display of tobacco products and an increase in annual license fees.

All available evidence suggests that there is a strong correlation between the availability and pricing of tobacco, and the smoking rate in the community. Therefore, strict licensing processes are an essential component of any smoking cessation strategy. RACS therefore supports the proposal to increase tobacco license fees, and believe that the increased financial burden will act as a further disincentive to businesses to continue selling tobacco products.

Additionally, we note that the proposed legislation forecasts a reduction in the rate of government expenditure required to oversee licensing and compliance related activity. Given that the social and economic costs associated with smoking are already one of the greatest strains on health budgets in Australia, RACS believes it is only fair that these costs are passed on to tobacco retailers wherever possible.

RACS appreciates the opportunity to provide input to this important area of public policy. We look forward with strong interest to see how the Department progresses with this significant issue.

Yours Sincerely,

Dr Girish Pande, FRACS
Chair, Tasmanian Regional Committee
Royal Australasian College of Surgeons