



**SCHOOL OF PUBLIC HEALTH
THE UNIVERSITY OF HONG KONG**

香港大學公共衛生學院

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Chairman
Panel on Health Services
Legislative Council
Legislative Council Complex
1 Legislative Council Road
Central, Hong Kong

Dear Sirs,

**Written Submission to the Panel on Health Services
Special Meeting on 6 July 2015**

Tobacco kills more than 7,000 people prematurely in Hong Kong every year, and of these, about 5,700 die from active smoking and 1,300 die from passive smoking. Smoking impairs almost every part of the human body. In Hong Kong, the annual economic loss attributable to smoking is about HK\$5.3 billion based on a conservative estimate. Strong tobacco control measures are urgently needed to save thousands of lives, prevent the numerous smoking-induced diseases and premature mortality, and reduce the gross health and economic burdens to smokers, nonsmokers and the community as a whole. Stronger tobacco control measures introduced more quickly will yield greater benefits sooner.

Many people, especially smokers and young people, under-estimate and deliberately or unconsciously ignore the detrimental health risks caused by smoking and secondhand smoke. Stronger and more striking health warnings on cigarette packaging are the most important source of health information for smokers and are effective to motivate many smokers to quit, and prevent nonsmokers particularly young people from smoking initiation. The bigger the size of the graphic health warnings, the greater will be the warning effects. The attractiveness of the cigarette packs and the advertising effects of the cigarette displays at points of sale will also reduce. The current health warnings on cigarette packs in Hong Kong are too weak as they fail to indicate all the smoking-induced diseases and the absolute risk of premature mortality caused by smoking.

As shown in the 2014 Report of the Surgeon General of the US Department of Health and Human Services, more and more diseases have been confirmed to be caused by smoking and secondhand smoke exposure. For example, liver cancer, colorectal cancer, tuberculosis, orofacial clefts, rheumatoid arthritis, stroke and diabetes, etc. are newly identified to be causally linked to smoking. To improve the health education and warning effects, we support the Government's proposal to increase the health warnings to 12 different versions so as to include more smoking-induced diseases and other adverse outcomes that most smokers are unaware of. We also support an increase of the size of the health warnings to cover 85% of the cigarette pack in Hong Kong, which will provide stronger health education and warning effects. Hong Kong is lagging behind in its efforts on health education and warnings about the harms of tobacco, as many countries have bigger size warnings. For example, Nepal has the graphic warnings of at least 90% of the cigarette pack surface area, followed by Thailand (85%), Pakistan (85%), Australia (82.5% with plain packaging). Australia has successfully

implemented plain packing banning the use of cigarette logos, colours or other designs on the pack, and their evaluation studies have shown remarkable health benefits. We strongly support an increase of graphic warning to 85% in Hong Kong. We recommend that the next step for Hong Kong is to go for plain packaging or standard packaging following Australia, the UK, and Ireland, in order to save many thousands more lives killed by smoking. I recall in the Legislative Council meeting passing the proposed increase in tobacco tax in June 2014 that many legislators urged the Government to increase public education on tobacco. This is the time that we expect these legislators to support the proposal, which does not need public funding to implement.

For mortality, the World Health Organization (WHO) warns that at least one in two smokers dies prematurely from smoking-induced diseases, that is, the absolute risk of a smoker to be killed by smoking is 1/2. Recent evidence shows that the absolute risk associated with smoking could be as high as 2/3. Most smokers and nonsmokers only have vague ideas that smoking is harmful but do not know the very high absolute premature mortality risk of smoking of 1/2. The warning message showing this absolute risk that “tobacco kills half of smokers” will be the first to convey this simple, clear and striking WHO warning that most smokers and the general public will understand. Failing to do so is almost like hiding such serious risks and depriving the public of this important health information of the absolute death risk of smoking.

E-cigarette use has increased rapidly particularly among young people. E-cigarettes have created increasing problems to tobacco control and public health in many western countries. E-cigarettes are now marketed as harm-free and safe in many countries before governments are ready to control them. However, more and more studies have revealed that e-cigarettes contain and deliver toxic substances to the users and the environment. The research in Japan and US confirmed that e-cigarettes produce carcinogen, such as acetaldehyde, formaldehyde, tobacco-specific nitrosamines (TSNAs), etc. Although e-cigarettes may be less dirty than cigarettes, the long-term health effect of e-cigarette use remains unknown. In addition, studies have found high dual use rates in both adolescents and adults. Smokers do not switch from cigarettes to e-cigarettes. Most smokers use cigarettes some of the time and use e-cigarettes in smokefree environment to circumvent smokefree laws. The dual use poses a health risk to the users.

At present in Hong Kong, e-cigarettes are classified as poisons under the Pharmacy and Poisons Regulations (Cap 138A) only if they contain nicotine. E-cigarettes claimed to be nicotine-free are not regulated at all. If e-cigarettes are allowed to be promoted as the e-cigarette marketing in the US and Europe at the moment, e-cigarettes use will increase quickly in young people, which will re-normalise cigarette smoking and tobacco use, reduce the effects of tobacco control measures, and make enforcement of smokefree laws very difficult. All claims of e-cigarettes as safe and harmless are not substantiated by proper studies or testing. There are also safety concerns of the equipment itself as it is an electronic device with a battery generating heat and vapor which are of uncertain nature. It is likely that many organic substances when vaporized by heat will generate some toxic chemicals harmful to humans. It is impossible or impracticable for governments to test and regulate all such substances and devices (existing ones and future products) under different heating conditions.

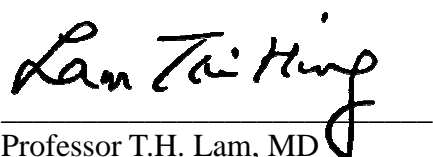
At present, the prevalence of e-cigarette use is low. Hence, as a public health precautionary measure, we support a total ban of all e-cigarette products including those claimed to be

nicotine-free. The ban should include manufacturing, import, export, possession, trade, sale and use, which is similar to the very successful total ban of smokeless tobacco starting in 1987 in Hong Kong. This is the best approach for Hong Kong to prevent the epidemic of e-cigarettes before it has become widespread. Failing this, Hong Kong will have great problems like the US in partial bans or regulations or restrictions which would allow all or some of the above. Before any regulations can be passed, the e-cigarette industry, together with the tobacco industry will quickly expand its marketing and promotion to increase the prevalence of use. When there are a substantial number and proportion of users in the community, governments would face tremendous challenge to come with effective regulations and restrictions.

The smoking ban at the bus interchanges in the tunnel portal area is an extension of the smoke-free area. We believe that it is only a small but important step forwards for achieving a more comprehensive smokefree law to protect the public from all secondhand smoke exposure. We strongly recommend to extend the smoking ban to include all bus stops, all queues in all public places, indoor and outdoor, and the outdoor areas of all catering venues, and the outdoor areas within 10 metres of the entrance of all buildings. Many countries have successfully introduced more comprehensive smokefree laws, including designated smokefree zones in busy walkways in Japan, smoking ban in queues and entrance of buildings in Singapore, and in public transport waiting areas in the US and Australia, with remarkable effects.

Hong Kong needs to quickly strengthen its tobacco control legislation so as to reduce the smoking prevalence to single digit figure within a few years. This would mean saving thousands of lives and billions of dollars and preventing the tragedies of many families suffering from the loss of their loved ones due to tobacco use. Children and young people will be benefited quickly from not being exposed to the aggressive e-cigarette marketing. We strongly support the proposals on tobacco control submitted by the Government to the Panel on Health Services of the Legislative Council and urge the LegCo to support and to ensure that these proposals be implemented as soon as possible!

Yours sincerely,



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