

Alþingi
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The Althing Health Committee
The Althing Offices
Austurstraeti 8-10
150 Reykjavík
Iceland

Stockholm, 11 December 2008

Subject: Philip Morris views on the possible introduction of pictorial health warnings

I am writing to you on behalf of Philip Morris AB as the Althing Health Committee is reviewing a bill for amendments to Act No. 6/2002 on tobacco prevention, which include the possibility to introduce pictorial health warnings on tobacco products sold in Iceland.

I would like to emphasize that we fully support clear and conspicuous health warnings for all tobacco product packaging. The content of these warnings should be determined by the health authorities. Tobacco products are addictive and cause serious diseases and consumers should be reminded of this. If the government/health authorities decide that pictures should be included in the warnings to illustrate the health effects of smoking, then we defer to the government on that decision. However, there are several factors that we respectfully wish to highlight in this regard:

- **Product Groups:** All tobacco products are harmful and cause disease and there would be no public health or other rationale for applying different warning requirements to different categories of tobacco products. We therefore believe that pictorial health warnings should be applied to all tobacco products sold in Iceland, i.e. cigarettes, roll-your-own tobacco, cigarillos etc. To require only manufactured cigarettes to carry the pictorial health warning could result in distortions to trade and lead to confusion among consumers. We also believe that the same rules should apply to all tobacco products at the same time.

- **Size of Warnings:** We agree that warnings should be clear and visible and do not dispute the right of the government to require us to set aside a substantial part of our consumer packaging for health warnings. However, we must retain enough of our packaging in order to be able to differentiate both our trade marks and our pack design from the products of our competitors. Currently the health warnings cover 30% of the front of the pack and 40% of the back, excluding in both cases the 3-4 mm black border around the warning. We believe that the current size of the warnings is sufficient for the warnings to be clear and prominent.

- **Number of Picture Warnings:** Based on our interpretation of Directive 2001/37/EC, Commission Directive C (2003) 3184 and Commission Decision C (2005) 1452, the Member States may chose to replace all or some of the 14 existing additional warnings with pictures selected from the Source Library. From a technical perspective, application of all available 42 images would be difficult to implement. We therefore suggest not to use all 42 images from the library, but to use one from each set of three, resulting in 14 pictures in total. The choice of the warnings should of course be determined by the Government. We believe that the warnings chosen should be rotated so that each appears on a regular basis. By mirroring the policy on written health warnings, it will allow for the pictorial warnings to be rotated in such a way as to guarantee their regular appearance.

- **Time-frame:** The new law should allow enough time for the production to be changed to new packaging and for retailers to sell out existing inventory with the former, non-pictorial warnings. As of the date the law is final, we estimate that we would need approximately 10 months to change production to the new pictorial warnings. An additional period would then be needed to ship the products to Iceland and for retailers to sell out existing inventory. Our current estimate is that approximately 12 months would be needed for that. Consequently we believe that a total transition period of 22 months would be sufficient.

We hope that the Health Committee will take the above points into consideration when considering and finalizing the law, and would be happy to meet with you or provide you with further information if you wish.

Yours sincerely,



Ulrika Dennerborg
Manager Corporate Affairs Sweden and Iceland