

## QUESTIONNAIRE

**Q1. Article 14 of the Smoking (Northern Ireland) Order 2006 provides the power for the Department to amend the age of sale of tobacco products, but this must not be lower than the present age of 16 years. Do you think the Department should:**

**continue with the present age limit of 16;**

**increase the age limit to 17; or**

**increase the age limit to 18?**

**Please tick the appropriate box to indicate which of the options you favour.**

No Change

Increase to 17

Increase to 18

**If you wish to comment on your preferred option, please do so here.**

The choice of option 3 will in our opinion provide a greater likelihood of long term health gain for future generations. Moving the age limit to a par with alcohol re-enforces the health risk message associated with cigarettes and also makes enforcement action in relation to under-age sales more uniform across tobacco and alcohol.

It is our belief that the progression into smoking and alcohol are closely linked chronologically. The lower the age of entitlement the greater risk of poor lifestyle choices in young people who are still impressionable. It is also our belief that those who start smoking at 16 or under are more likely to progress to alcohol and in some instances illicit drugs.

As well as raising the age limit for purchase we would also hope that that the legislation will provide significant penalty for those who buy cigarettes for someone under 18.

It is our view that robust and effective enforcement will be critical to this legislation

## General

**Q2. Do you have any views on the conclusions reached by the Department to screen out from further assessment the implications of the proposals in respect of:**

- (a) **Social Impact Assessment (New TSN, Homelessness etc);**
- (b) **Rural ;**
- (c) **Environmental;**
- (d) **Human Rights;**
- (e) **Victims;**
- (f) **Community Safety & Other Areas?**

Is there any other evidence which you consider should have been taken into account in these assessments?

No the evidence worldwide is clear on the need for measures such as this.

The Department would particularly welcome comments on the following:

**Q3. Do you agree with the decision that the proposals do not require a full equality impact assessment? (see Annex 1 of consultation package). If not, please explain why?**

Yes

It is our view that ill-health creates inequality and that tobacco is a key factor in many cases of mortality and ill-health in NI. Furthermore we believe that the evidence related to tobacco makes it appropriate in this instance to enforce an action that can only be of benefit to all sections of the population.

**Q4. Is there any other qualitative or quantitative information which you consider should have been taken into account in performing this exercise?**

No

**Q5. Are you aware of any evidence - qualitative or quantitative - that the proposals may have an adverse impact on equality of opportunity or on good relations? If so, please provide details. Can you suggest any ways of avoiding or minimising such adverse impact?**

No

**Q6. Are you aware of any other equality implications likely to arise from the proposals?**

No

## **Partial Regulatory Impact Assessment (RIA)**

(see Annex 2 of consultation package)

### **Health**

**Q7. Do you have any views on the assessment of health impacts?**

We fully endorse a raising of the age limit based upon the irrefutable evidence of health impact outlined in the Appendix.

**Q8. Are there any other potential health impacts that you consider should have been addressed?**

No

**Q9. Is there any other material evidence that you consider should have been taken into account in this assessment of health impacts?**

No

### **Economic**

**Q10. Do you have any general comments on the overall approach that was taken in completing the RIA?**

No

**Q11. Do you consider that there are other issues that need to be taken into account in the assessment of the impact on business?**

No

**Q12. Do you agree with the analysis of the sectors and business/organisations that might be particularly affected by the proposals?**

Yes

**Q13. What are your views on the identification and assessment of the costs and benefits?**

We believe the savings to health expenditure, and gains in population health over time will be good for society in the long term.

### **Public Expenditure and Public Service**

**Q14. Do you agree with the Department's view that a separate Economic Appraisal is not required?**

Yes

### **Impact on Small Businesses**

**Q15. Do you agree that the proposals will not have a disproportionate impact on small businesses?**

Yes, this assertion is being supported by the negligible impact made by the smoking ban as a whole on small businesses.

**Q16. Are there any impacts on small businesses that you consider should have been addressed?**

No

**Q17. Is there any other material evidence that you consider should have been taken into account in assessing the impact on small businesses?**

No

### **Rural Proofing**

**Q18. Do you agree that the proposals will not have a disproportionate adverse impact on rural business?**

Yes

**Q19. Are there any rural impacts that you consider should have been addressed?**

No

**Q20. Is there any other material evidence which you consider should have been taken into account in this assessment of rural impacts?**

No

### **Additional Comments**

**Q21. Do you have any other comments or suggestions on the Integrated Impact Assessment Overview? (Annex 1 of consultation package)**

No