

SFP - 32

## Sub Committees on The Smoke-free Premises etc. (Wales) (Amendment) Regulations 2012

Response from the Royal College of Physicians (RCP)

16 January 2013

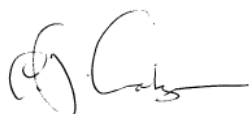
Dear Sir or Madam

### **Re: The Smoke-free Premises etc. (Wales) (Amendment) Regulations 2012**

The Royal College of Physicians (RCP) plays a leading role in the delivery of high quality patient care by setting standards of medical practice and promoting clinical excellence. We provide physicians in the United Kingdom and overseas with education, training and support throughout their careers. As an independent body representing over 27,500 Fellows and Members worldwide, we advise and work with government, the public, patients and other professions to improve health and healthcare.

The RCP is grateful for the opportunity to respond to the above inquiry being conducted by the Enterprise and Business Sub-Committee and the Health and Social Care Sub-Committee. At this stage, we would like to re-submit the comments sent in reply to the earlier consultation on this issue. To that end, please find attached a letter dated 15 March 2012 that sets out the views of both the RCP and the UK Centre for Tobacco Control Studies (UKCTCS).

Yours faithfully



Dr Patrick Cadigan  
Registrar

Enclosure: RCP/UKCTCS response to Welsh Government consultation – dated 15 March 2012

15 March 2012

Dear Sir or Madam

**Re: Welsh Government - The Smoke-Free Premises etc. (Wales) (Amendment) Regulations 2012**

The Royal College of Physicians (RCP) plays a leading role in the delivery of high quality patient care by setting standards of medical practice and promoting clinical excellence. We provide physicians in the United Kingdom and overseas with education, training and support throughout their careers. As an independent body representing over 26,000 Fellows and Members worldwide, we advise and work with government, the public, patients and other professions to improve health and healthcare.

I write on behalf of the RCP and the UK Centre for Tobacco Control Studies (UKCTCS). We are grateful for the opportunity to respond to the above consultation and would like to make the following joint submission.

We understand and sympathise with the desire to support the film and television production industry in Wales, and acknowledge the difficulty that the English exemption must create. However, the concern is that allowing this exemption will result in passive exposure of staff involved in the production to smoke, and may result in actors/actresses who do not smoke being pressured into active smoking for the purposes of the production.

Smoking imagery in film and television is also a widely recognised driver of adolescent experimentation and uptake of smoking, so the impacts of this policy change, if it results in more smoking depictions in the media, are substantially greater than those to the production staff involved.

Furthermore our own analyses of tobacco content in films popular in the UK indicates that use of tobacco remains high, and that branding is particularly common in UK productions (see attached pdf). Equivalent analyses of UK TV programming (in preparation for publication) suggest that content in UK television is much lower than in film, but remains a persistent problem in soaps and reality shows, and rarely with obvious relevance to artistic integrity – as for example in the attached still photo, featuring Marlboro branding, from the Gavin and Stacey Christmas Special.



Our concern is therefore that this amendment will signal a green light for much more widespread use of smoking in productions. We therefore counsel against the amendment. If the government chooses to support it, then we would suggest that the second criterion is amended to require that tobacco content is *strongly justified* rather than simply appropriate.

Yours faithfully

Dr Patrick Cadigan  
Registrar

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2010.pdf