

**Submission
No 49**

INQUIRY INTO ILLEGAL TOBACCO TRADE

Organisation: Australian Council on Smoking and Health

Date Received: 6 August 2025

NSW Legislative Council's Portfolio Committee No. 5 - Justice and Communities

Inquiry into the illegal tobacco trade

Response by the Australian Council on Smoking and Health (ACOSH)

August 2025

ACOSH acknowledges the traditional owners of the land on which we are based, Whadjuk Noongar Country. We acknowledge Noongar Elders and families and pay our respects to Elders past, present and emerging.

01 August 2025

Hon. Robert Borsak MLC
Chair, Portfolio Committee No. 5 - Justice and Communities
Legislative Council,
NSW Parliament
Via: Parliament of NSW Inquiries submission webpage

Background

The **Australian Council on Smoking and Health (ACOSH)** is an independent, non-government, not-for-profit coalition of thirty-one prominent health, education, community, social service and research bodies. ACOSH members are united in their shared concern about smoking, vaping and health. Established in 1971, ACOSH works collaboratively across the public health sector. In submitting a response to the Inquiry, we also endorse recommendations **in full** of the submission to this Committee by Cancer Council NSW, with whom we work closely.

ACOSH works through advocacy and collaboration on comprehensive strategies to achieve a tobacco– and vape-free Australia by 2030. **We have never provided or received services, assistance, or support to or from the tobacco or e-cigarette industry.**

We are funded by the Western Australian Health Promotion Foundation (Healthway).

Declarations:

International research has demonstrated that industry actors selectively promote internally funded or non-peer reviewed studies as their evidence, which can misrepresent the scientific evidence base. These tacticsⁱ are designed to dilute support for strong tobacco control.

In accordance with Article 5.3 of the World Health Organization Framework Convention on Tobacco Control (WHO FCTC)ⁱⁱ, to which Australia is a signatory, we urge the Committee to remain vigilant to attempts by the tobacco industry, or its representatives, to influence public policy or decision-making in this process. Protecting public health policy from commercial and vested interests of the tobacco industry is both an international obligation and a critical safeguard to ensure decisions on policies are based on the best possible independent, evidence-based considerationsⁱⁱ.

To support transparency and accountability, all submissions and witnesses should clearly disclose any relevant affiliations and sources of funding.

Submission contact:

Laura Hunter
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E:

Response: Inquiry into the illegal tobacco trade

We acknowledge the Terms of Reference for this review, which examine the links between illicit tobacco and serious and organised crime, money laundering practices, legal protections for landlords, legislative adequacy, enforcement capability, and the social and economic impacts on small businesses and regional communities. These are all valid areas for investigation.

However, what is conspicuously absent is any meaningful consideration of the public health impact of illicit tobacco. Tobacco remains a leading cause of preventable death in Australia, responsible for 66 deaths every dayⁱⁱⁱ and driving high rates of cancer, heart and lung disease, and diabetes^{iv}. The growth of the illicit tobacco market directly undermines our internationally recognised success in tobacco control. This market not only increases access to cheaper, unregulated products but also threatens to reverse decades of public health progress by making tobacco more accessible, particularly to young people and vulnerable communities.

Importantly, this review takes place within a broader context where the tobacco industry is actively pushing narratives that seek to frame illicit trade as a problem caused by government taxes, and position retailers as victims whose profits and sales need to be protected. These arguments serve commercial interests - not public health. The people who deserve protection from the harms of the illegal tobacco trade are everyday Australians, not the industry that profits from addiction, nor those retailers who are knowingly breaking the law.

Our submission aims to re-centre health in this conversation. Without incorporating a public health lens, the inquiry risks delivering policy recommendations that compromise community wellbeing and weaken Australia's long-standing commitment to reducing deaths and disease caused by smoking.

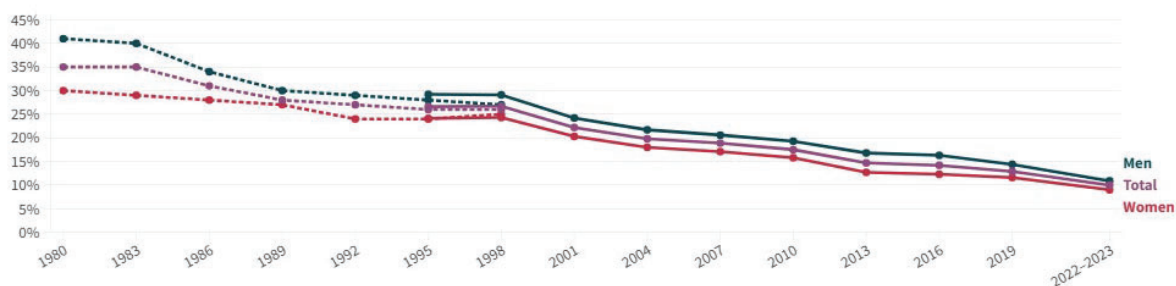
ACOSH has sought and collated high-level critiques from ACOSH member organisations, which include health and public health professionals with tobacco control and clinical expertise and have identified and summarised below important components for the Committee's consideration.

Consideration 1: Illicit tobacco is not just a law enforcement problem; it's also a health issue

Australia is recognised globally as a leader in tobacco control, with decades of strong public health policy driving smoking down from highs of more than 35% in 1980 to about 10% regular smoking in 2022-23^v. This is one of our greatest public health achievements - and one that must not be undermined^{vi}. Any discussion on tobacco, whether legal or illegal, must uphold this legacy and ensure that public health remains at the centre of decision-making.

Figure 1.3.1 Prevalence of Australians aged 18+ who regularly smoke* (%)

1980 to 1998 (ACCV data) and 1995 to 2022–23 (NDSHS data)



Notes: Anti-Cancer Council data includes those describing themselves as smoking any combination of cigarettes, pipes or cigars with no frequency specified; NDSHS data includes those reporting that they smoke any combination of cigarettes, pipes or cigars 'daily' or 'weekly'.
Anti-Cancer Council data weighted to 2001 census population data, standardised by age and sex

Sources: Centre for Behavioural Research in Cancer, analysis of data from surveys conducted by the Anti-Cancer Council of Victoria from 1980–1998, and Tobacco in Australia: Facts & issues analysis of AIHW National Drug Strategy Household Surveys 1995 to 2022–2023. ADA Dataverse, 2024.

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Tobacco in Australia
Facts & Issues

* A Flourish chart

One of the most powerful drivers of Australia's success in reducing smoking has been the steady increase in the price of tobacco. Price is a key deterrent to smoking, and this strategy has significantly contributed to declining consumption and daily smoking rates: from 24.3% in 1991 to 8.3% in 2022.^{23v} However, the rise of the illicit trade seriously undermines this approach. By having cheaper tobacco more accessible, particularly to young people and disadvantaged groups, the illicit trade is directly contributing to preventable illness and death and threatens to reverse the gains made through decades of evidence-based policy.

Recommendations

- ACOSH recommends that the Committee ensures tobacco control remains central to outputs by this Committee, by compiling and putting forward evidence-based recommendations that protect Australians from the health harms of illicit tobacco products.

To protect the integrity of this Inquiry and ensure alignment with Australia's obligations under Article 5.3 of the WHO Framework Convention on Tobacco Control, we recommend the Committee adopt a robust conflict-of-interest framework. This should include:

- Requiring all individuals and organisations making submissions to provide a full disclosure of any financial or non-financial support - direct or indirect - from entities involved in the production, distribution, or sale of tobacco, nicotine, or vaping products; and
- Excluding individuals, companies, or organisations with such links from participating in public hearings.

These steps reflect best-practice in safeguarding public health policy from vested commercial interests and will help ensure that the Inquiry's recommendations are informed by independent, evidence-based contributions.

Consideration 2: Preventing tobacco from becoming more affordable is critical to reducing smoking

Tobacco tax and pricing policies are one of the most effective policy mechanisms to reduce population consumption of tobacco^{vii, viii, ix, x, xi, xii, xiii}. In particular, young people and those from vulnerable communities, are most receptive to pricing policies^{xiv} meaning that the tobacco excise plays an important role in both initiation and quitting decisions. Recently, the NSW Premier Chris Minns called for lower tobacco excise^{xv} amid claims it fuelled the illicit trade of tobacco. However,

there is evidence that illicit tobacco trade exists in countries with and without high levels of tobacco taxes; and that countries that have reduced tobacco excise in attempts to reduce illicit trade have not been successful^{xvi}.

In the early 1990s, Canada^{xvii} halved its tobacco excise to combat smuggling across the U.S. border, but the move led to more people (especially young people) starting to smoke, and fewer quitting. Cigarettes are much cheaper in the U.S. than in Australia, yet illicit trade in tobacco is also common. Similarly, in countries such as Vietnam^{xviii}, the Philippines^{xix}, and Senegal^{xx}, tobacco is very cheap, yet illicit cigarettes continue to flood the market.

Fifteen years ago, the United Kingdom^{xvii} was also facing a problem of high levels of illicit trade in tobacco. Rather than cutting taxes under pressure from the tobacco industry, the UK Government took a smarter approach – keeping the tax and implementing a comprehensive enforcement strategy to tackle the issue. As a result, the size of the illicit trade of tobacco in the UK declined.

Enhancing enforcement mechanisms and addressing regulatory gaps are critical to improving control of the supply chain oversight and ensuring adequate resourcing for compliance efforts. It is critical that the NSW government continues to support the Federal government to maintain coordinated action towards the illicit tobacco trade issue and policy responses to it.

Recommendations

- ACOSH recommends that the NSW Government continues to support the Federal Government in retaining the tobacco excise tax as an effective, evidence-based strategy for reducing smoking prevalence.

Consideration 3: Licensing is a crucial first step but much more needs to be done to monitor compliance and enforce laws against selling untaxed tobacco

The implementation of NSW's tobacco licensing scheme is a welcome and important step forward in tackling the illicit trade of tobacco. However regulatory reform to stop illegal sales of tobacco are evolving quickly across Australia, with laws substantially strengthened in Victoria, Queensland and South Australia over the past three months. Recently passed NSW legislation and regulations now fall considerably short of national best practice^{xxi} and need to be urgently reviewed. ACOSH commends the recent announcements of plans to introduce tougher penalties, immediate closure powers, and lease termination measures. These mark strong steps forward in preventing illegal sales and protecting public health^{xxii, xxiii, xxiv, xxv}. However, to ensure these reforms are responsive to current trends, we have outlined below further legislative and enforcement improvements below. Effective licensing requires dynamic enforcement tools and robust compliance procedures, legislative clarity, and adequate resourcing^{xxi}.

Strengthening Compliance and Enforcement

1. Effective law enforcement requires adequate authority to act. Providing NSW Police with the power to enter and search licensed tobacco retail outlets, business-related vehicles and warehouse facilities and to issue closure orders and take action in the event of breaches of closure orders would support more effective detection of non-compliant activity and strengthen the state's response capacity.
2. Current legislation focuses on prohibiting the *sale* of tobacco products that do not meet federal packaging standards. However, selling products that do comply with packaging laws but on which duty has not been paid also poses a significant risk to public health objectives and revenue integrity. Recognising such conduct to also be an offence would bring NSW in

line with other jurisdictions that treat both tax evasion and packaging non-compliance as key elements of the illicit tobacco trade.

3. Legislation aiming to eliminate illicit trade in tobacco is not seeking to criminalise individuals but rather to prevent individuals and entities from profiting from supply. However, allowing possession of even small quantities of such products on commercial premises undermines this intent, allowing retailers to supply the next customer but evade prosecution by keeping the bulk of their stock of untaxed tobacco offsite in warehouses or vehicles. A legislative amendment to prohibit possession (not just sale) of any quantity of non-compliant products on tobacco retail premises (similar to the provision in place in Victoria) would close this gap.
4. Safeguards at the point of licence approval are equally important. While applicants are required to pass a 'fit and proper person' test, for a product as dangerous and addictive as tobacco we contend that licences should be issued only to those with a demonstrated commitment to the highest standards of legal and ethical conduct, processes to ensure training and probity in decision-making and capacity for secure storage, tracking and reporting of stock movements at all stages.
5. Introducing greater transparency from wholesalers would assist in tracking movement of tobacco products. Mandating that wholesale licence holders provide NSW Health with data on product-level sales volumes would enhance the system's ability to detect supply irregularities and intervene early.
6. Where property owners lease premises to retailers engaged in illegal tobacco sales, appropriate penalties should apply. This would help deter complicity and reinforce responsible leasing practices.
7. Extend the duration of retail bans imposed on individuals convicted of selling illegal tobacco or nicotine products, further strengthening enforcement and deterrence measures.

These proposed reforms offer a pathway to improving the effectiveness of the licensing system.

Arguments against resourcing enforcement fail to recognise that similar public health protections - such as liquor licensing and food safety regulations - would never be expected to operate without proper oversight. Failure to act effectively on tobacco enforcement sends a dangerous signal: that illegal sales, including to children and young people, will be tolerated.

Alignment with national best practice

While the new licensing scheme is a step in the right direction, ACOSH calls for further refinements to ensure the laws act as sufficient deterrents – bringing NSW into alignment with other high-performing jurisdictions. Through ACOSH's review of state and territory progress in our 2025 Tobacco Control Scorecard campaign released in May this year, we saw South Australia and Queensland implementing tough laws and substantial penalties for infringements. The legislative framework and investment in compliance and enforcement has had a significant impact on inspections, seizures and closure-orders in a short period of time:

- South Australia's Consumer and Business Services Department reports^{xxvi} that since 1 July 2024, millions of dollars' worth of illicit cigarettes, vapes and loose tobacco have been seized including 17.2 million cigarettes valued at \$13.7 million, 105,100 vapes valued at \$4.5 million, 6 tonnes of loose tobacco valued at \$3.1 million, 2.3 million cigarette tubes valued at \$1.4 million, and 834 nicotine pouches valued at \$25,000. More than 500 inspections have been conducted in the state, and 33 short-term closure orders have been issued.

- Queensland Health confiscated 5.8 million illicit cigarettes; 230kg of loose illicit tobacco; 14,300 illicit vapes; and 23,900 illicit nicotine pouches in April 2025 alone ^{xxvii}.

This comprehensive approach to tobacco control is something that other states and territories can model, applying best practice responses across all elements of licensing, compliance procedures and enforcement powers. Best practice features not currently in place in NSW^{xxi} include:

- Restricting tobacco retailers from purchasing from wholesalers who are not appropriately licenced in their state/territory;
- Prohibiting sale of tobacco other than in brick-and-mortar stores (e.g. online and vending machine sales);
- Prohibiting sale of tobacco by persons (shop servers) under 18 years of age; and
- Defining offences under the licensing scheme for the supply of other nicotine products, including vapes and pouches.

Recommendations

ACOSH recommends that the NSW Government:

- Further strengthens licensing, compliance procedures and enforcement powers to align with best practice across jurisdictions;
- Introduce the legislative and operational reforms outlined above, including new offences, expanded police powers, and stronger licence conditions;
- Ensure adequate and sustained resourcing for enforcement and compliance monitoring;
- Prioritise inter-agency coordination to reflect the cross-cutting nature of illicit tobacco enforcement; and
- Evaluate the impact of the licensing scheme to guide future policy and operational improvements.

Consideration 4: Maintain funding for cessation and prevention

Most Australians who smoke desperately want to stop smoking altogether^{xxviii} and it is important that the NSW Government supports comprehensive approaches to tobacco control, ensuring that compliance and enforcement of laws banning sale of untaxed tobacco is complemented by investment in proven and effective cessation strategies to help those who smoke to quit.

Embedding evidence-based smoking cessation support across the NSW Health system is a vital part of a comprehensive approach to tobacco control and enhances the impact of tobacco excise measures^{xxix}. Services such as Quitline, pharmacotherapies, and brief advice interventions are not only effective but also highly cost-efficient. Ensuring that all patients are consistently offered support to quit - through routine brief advice and referrals at every point of contact with the health system - helps normalise cessation as part of standard care and increases quit attempts across the population.

Expanding this systems-level approach into the non-government sector, including community organisations and Aboriginal Community Controlled Health Services, is critical to ensuring equitable access to cessation support particularly for people from low socioeconomic backgrounds. ACOSH works closely with Cancer Council NSW, and programs such as its *Tackling Tobacco Program* demonstrate that embedding smoking cessation into routine practice within the NGO sector is both feasible and effective.

Recommendations

- ACOSH recommends that the NSW Government ensures that compliance and enforcement of laws banning sale of untaxed tobacco is complemented by investment in proven and effective cessation strategies to help those who smoke to quit
- We recommend that the NSW Government continue investing in cessation support and consider requiring government-funded NGOs to integrate cessation into their service delivery as a condition of contracts. This must include prioritising culturally safe, community-led approaches for First Nations peoples, who continue to experience disproportionate tobacco-related harms due to ongoing commercial and colonial impacts^{xxx}.

Conclusion

ACOSH calls on the Committee to take a strong public health approach to tackling illicit tobacco, ensuring that all recommendations are grounded in evidence and aligned with Australia's international obligations.

The approach should include adopting clear safeguards against industry influence, strengthening enforcement and regulatory frameworks, and ensuring sustained investment in prevention and cessation support.

A coordinated, whole-of-government response is essential, with particular attention to supporting communities most affected by tobacco-related harms, including First Nations peoples. Through these actions, the Committee can help protect Australians from the significant health risks associated with illicit tobacco while reinforcing national tobacco control efforts.

Thank you for the opportunity to contribute to this discussion.

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