

INQUIRY INTO ILLEGAL TOBACCO TRADE

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1. EXECUTIVE SUMMARY

1.1 Illegal tobacco use is an escalating public health and law enforcement challenge in New South Wales and across Australia. Despite national and state efforts to strengthen regulation, enforcement, and penalties, an estimated 40% of all tobacco consumed in Australia in 2024 was illegal - representing a \$6.7 billion loss in excise revenue and a growing public health threat.¹

This submission makes the case for urgent, coordinated action to combat the illegal tobacco trade, drawing on evidence, community concerns, and best-practice policy. It advocates for a comprehensive, multi-pronged strategy grounded in national consistency, effective enforcement, retail reform, and youth protection.

1.2 Key Issues

- **Organised Crime Involvement:** The illegal tobacco trade is now embedded in serious and organised criminal networks, who exploit regulatory gaps and view the industry as low-risk and high-reward.
- **Retail Proliferation:** Community members in Mackellar have reported a rapid rise in tobacconist and vaping stores - often located near schools and styled to attract children - prompting concern about youth access and criminal activity.
- **Youth Exposure:** The visibility and density of tobacco retail outlets, especially those targeting children with confectionery-style shopfronts, increase the likelihood of smoking initiation among young people.
- **Inconsistent Regulation and Weak Enforcement:** Australia's current fragmented licensing and enforcement regime fails to adequately deter illegal activity, particularly in under-resourced states like NSW.

1.3 Community Voice

The submission includes extensive testimony from concerned constituents in Mackellar, who have documented the alarming increase of tobacconist stores in their suburbs - often within walking distance of schools and bus stops - and expressed strong support for tougher regulation and enforcement.

¹ [June 2025, FTI Consulting, Illegal Tobacco in Australia 2024](#)

2. RECOMMENDATIONS

2.1 Licensing, Regulation, and Retail Controls

1. Introduce location-based restrictions, including minimum distances from schools, playgrounds, childcare facilities and youth spaces.
2. Cap the number of retail tobacco licences per population or local government area.
3. Prohibit clustering of tobacconists by introducing minimum separation distances (e.g., 150-500 metres).
4. Ban child-attractive marketing tactics such as toys and sweets in shopfronts and restrict children from entering tobacconist premises.
5. Separate tobacco from general retail environments to reduce normalisation.
6. Publicly report licensing data by location to enhance transparency and compliance.
7. Implement fit-and-proper person tests and allow for licence revocation where necessary.

2.2 National Consistency and Enforcement Reform

8. Establish a nationally consistent licensing regime covering the entire supply chain.
9. Introduce a unified national enforcement framework with minimum penalties and powers.
10. Create a permanent national illegal tobacco and vape intelligence capability.
11. Mandate national public reporting on enforcement actions.
12. Expand resourcing of enforcement bodies and allow broader law enforcement engagement in compliance activities.

2.3 Penalties and Deterrence

13. Ensure all jurisdictions impose strong penalties for serious offences, including commercial possession, unlicensed sale, sale to minors, and trafficking.
14. Introduce long-term property closure orders for non-compliant businesses.

2.4 Community Engagement and Awareness

15. Launch a targeted public awareness campaign on the harms of illegal tobacco, its ties to organised crime, and its impact on public health and government revenue.

3. INTRODUCTION

- 3.1 Tobacco use remains the leading risk factor contributing to death and disease in Australia. In 2018 alone, it was responsible for nearly 20,500 deaths - accounting for 13% of all deaths - and 8.6% of the total burden of disease nationwide.² The health, social and economic toll of tobacco is immense, with tobacco-related illness costing the Australian economy more than \$137 billion annually, through healthcare costs, lost productivity and premature death.³ Preventing addiction before it starts remains one of the most impactful and cost-effective public health interventions available to governments at all levels.
- 3.2 In response to this burden, Commonwealth, state and territory governments have taken commendable steps in recent years to strengthen regulation, enforcement, licensing and penalties to curtail both legal and illegal tobacco use. Legislative reforms, including the *Public Health (Tobacco and Other Products) Act 2023* and its consequential provisions, reflect the Commonwealth's commitment to tobacco control. Last year the Federal Government established an Illegal Tobacco and E-Cigarette Commissioner role to co-ordinate efforts. The NSW Government has introduced major reforms, including the formation of a dedicated multi-agency taskforce, a new tobacco licensing scheme commencing 1 July 2025, and a significant suite of strengthened enforcement powers - ranging from severe financial penalties to short and long-term closure orders for non-compliant retailers.
- 3.3 Comparable actions have also been taken in other states. Victoria, South Australia, and Queensland have introduced or expanded licensing and enforcement regimes, backed by significant public investment and stronger penalties. These measures acknowledge the escalating presence of organised criminal networks profiting from illegal tobacco and vape trade, which pose a serious risk to community health and the rule of law.
- 3.4 Despite these actions (albeit some being more recent), an estimated 40% of all tobacco consumed in Australia in 2024 was illegal, with the volume of illegal product growing significantly year-on-year.⁴ The potential lost excise in 2024 alone was \$6.7 billion⁵, and the number of retailers selling tobacco - legal or otherwise - has now risen to almost 20,000.⁶ Alarming, young Australians aged 18-24 are increasingly turning to traditional and illegal tobacco products⁷, reversing decades of progress in youth smoking prevention.
- 3.5 The enforcement challenge is real and urgent. While the Australian Border Force and ATO seized over 1,750 tonnes of illegal tobacco in 2024, this represented a 19% decrease in total volume seized compared to 2023 - suggesting that significant quantities

²29 Feb 2024, [National Drug Strategy Household Survey 2022-2023: Tobacco smoking in the NDSHS - Australian Institute of Health and Welfare](#)

³ Ibid.

⁴ June 2025, [FTI Consulting, Illegal Tobacco in Australia 2024](#)

⁵ Ibid.

⁶ 19 May 2025, [SMH, Lucy Macken and Riley Walter, 60 tobaccoists for every McDonald's: How Sydney's streets became consumed by smoke shops.](#)

⁷ 24 March 2025, James Martin & Edward Jegasothy, Harm Reduction Journal, [Fanning the flame: analysing the emergence, implications, and challenges of Australia's de facto war on Nicotine.](#)

are entering Australia undetected.⁸ The market continues to be dominated by unregulated tobacconists, which account for almost half of all illegal loose-leaf tobacco sales, and 96% of vapes are still being accessed via black-market sources without prescription.⁹

- 3.6 The illegal tobacco and vape trade is now firmly embedded in the operations of serious and organised criminal groups, who view it as a low-risk, high-reward enterprise. It undermines legitimate businesses, reduces government revenue, increases youth exposure to addictive products, and jeopardises decades of public health gains.
- 3.7 As an Independent Member of Parliament and former GP committed to evidence-based health reform, I strongly support coordinated, cross-jurisdictional action to combat this growing threat. The NSW Legislative Council Inquiry into the Illegal Tobacco Trade offers a vital opportunity to assess the effectiveness of current policy settings, identify enforcement gaps, and strengthen our collective capacity to protect communities from harm.

⁸ [June 2025, FTI Consulting. Illegal Tobacco in Australia 2024](#)

⁹ 24 March 2025, James Martin & Edward Jegasothy, Harm Reduction Journal, [Fanning the flame: analysing the emergence, implications, and challenges of Australia's de facto war on Nicotine.](#)

4. MACKELLAR COMMUNITY CONCERN ABOUT PROLIFERATION OF TOBACCONISTS

4.1 Residents of Mackellar on the Northern Beaches of Sydney are growing increasingly alarmed by the rapid spread of tobacconist and vaping stores across their communities, particularly in neighbourhood shopping strips and areas close to schools. In suburbs such as Newport, Dee Why, Mona Vale, Bilgola Plateau, Frenchs Forest, Narrabeen and Avalon, locals report a surge in shopfronts selling tobacco, vapes and sweets aimed at young people - with some stores styled like candy shops and located within walking distance of primary schools. Residents have voiced strong concerns about the influence of these shops on youth, the apparent ease with which illegal products are being sold, and the broader role such businesses may play in enabling organised criminal activity. Many question the economic viability of these stores based on legal sales alone, and are calling for urgent investigations, tougher enforcement, and a proactive stance from all levels of government to protect young people and uphold community wellbeing.

Examples of constituent correspondence:

4.2 Frenchs Forest resident:

“There are currently 3 of these convenience stores in Newport, 2 in Mona Vale and 1 on Bilgola Plateau. Two of these are not far from schools. Surely the ATO has enough people to undertake an operation targeting these stores. Maybe closing the stores and fining the store traders \$100k and closing the property down for 12 months. Australia is losing the war on tobaccos and vapes as long as criminal syndicates form for this industry. These addictive nicotine items are falling through the cracks to get into these retail shops ... if we want NSW to win the war on tobacco and vapes we need to shut down all tobacconist businesses that sell tobacco, vapes and bongs etc and have (an) entire ban of tobacconist licences under the retail sector.”

4.3 Newport resident:

“Are you aware that three tobacco shops have opened up in the Newport shopping strip in the recent year(s). Is there anything being (or can be) done to close them down or discourage them?”

4.4 Newport resident:

“I am writing to you to express our concern over the amount of vaping shops sneaking into our community. As a doctor, you know how bad vaping is especially in our young and impressionable youth. I just don’t understand how shops like Glass Avenue - who support and provide a much-needed service - can’t afford the rental increases in Newport but these empty vaping shops can. We have 3 in Newport!

One (tobacconist) next door to a popular coffee shop Zubi has bongs and other smoking devices on display which can be seen clearly through the open doors by our young children. They draw in our youth by selling American lollies and other sweet treats. I really hope you can help and change this increasing threat to our communities’ health.”

4.5 Frenchs Forest resident:

“Following the opening of tobacconist at the Forestway Shopping Centre, now (another one) in a quiet street corner shopping area - Sorlie Rd in Frenchs Forest. This is a

widespread issue which is being investigated by journalists of Sydney Morning Herald. I would like to see us (as) a community addressing the matter proactively before the issue hits us real hard. The kids deserve the protection of the grown-ups and all levels of the governments. We cannot watch them being destroyed.

4.6 Avalon Beach resident:

"I am writing because I have noticed in the last year a large number of tobacconist shops opening in the Northern Beaches. There is 1 in Avalon, 3 in Newport, at least 4 in Mona Vale, today I noticed a new one in Narrabeen, they appear to be popping up everywhere. It seems quite obvious that they could not exist on the small amount of sales they may get on soft drinks, lighters and legal tobacco, I personally have not seen a single person walk into any of these stores. I also don't feel like there aren't a large number of smokers in the local area. Which leaves people wondering is it something illegal, it is a growing concern as more appear. It would be really great to know that these places and operators are being investigated."

4.7 resident:

"I am writing to you as a long-term resident of _____ and a deeply concerned member of our community regarding the recent opening of a tobacco and vape store in our local shopping strip. This store is situated alarmingly close, less than 500 metres from _____ Primary School, which raises immediate and serious concerns about the influence it could have on our children. Even more troubling is the shop's decor, which is styled like a candy store. This seems like a deliberate tactic to attract the attention of young children, which is both inappropriate and irresponsible. The arrival of this store has only added to the challenges, casting a shadow over the area and prompting widespread dismay among local residents. The notion of cheap \$10 a pack cigarettes and sweets being sold under the same roof, within walking distance of a primary school, is not just disturbing, it's unacceptable. What kind of message are we sending to the next generation?"

4.8 Collaroy resident:

Another tobacco shop I know of is in Collaroy Plateau around the corner from Augusta shops. This one is near two primary schools: Wheeler Heights and St Rose.

5. DENSITY AND LOCATION OF TOBACCONISTS

- 5.1 The density and location of tobacco retailers is a critical factor influencing smoking initiation, particularly among young people. Research has demonstrated that individuals living in areas with a higher concentration of tobacco outlets are significantly more likely to smoke.¹⁰ Conversely, smoking rates decline in communities where exposure to retail tobacco outlets is reduced.
- 5.2 There is international evidence supporting the implementation of location-based restrictions on tobacco sales. Many jurisdictions - including parts of the United States (such as California, Illinois, Louisiana, and New York), as well as countries such as China, Turkey, Ghana and India - have established “tobacco-free zones” near schools and other youth-centric locations.¹¹ In India, for example, the sale of tobacco products within 100 yards of educational institutions has been banned since 2003.¹² These measures have been shown to reduce retailer density and are associated with lower youth smoking rates.
- 5.3 Australia’s National Tobacco Strategy 2023-2030 includes the priority action item of exploring ‘options to further regulate where tobacco products are retailed, including regulatory approaches to control or restrict the number, type and location of tobacco outlets’.¹³ While all States and Territories have or are currently introducing licensing schemes, none of these schemes cap the number of licenses being issued or restrict where tobacco retailers are located. Restrictions on the number and locations of tobacco licensees was recommended by the Victorian Parliament’s Public Accounts and Estimates Committee Inquiry into Vaping and tobacco controls in August last year, but this has not been adopted.¹⁴ Northern Beaches Council has announced it will make a submission to this inquiry, advocating for changes to the Standard Instrument Local Environment Plan. These changes would empower local governments to prohibit tobacco shops from operating near schools, parks, playgrounds, and other recreational spaces.
- 5.4 It is recommended that the protection of children be a guiding principle of any policy that regulates the density and location of tobacco retailers. This includes setting minimum distance requirements between tobacco outlets and youth-focused locations such as childcare centres, schools, and sporting grounds. Moreover, evidence suggests that prohibiting tobacco outlets from operating in close proximity to each other further reduces overall density, especially in economically disadvantaged communities where retailer clustering is often most pronounced.
- 5.5 Internationally, municipalities such as Huntington Park and Santa Clara County in California have implemented minimum spacing requirements between tobacco retailers of 200 and 500 feet respectively.¹⁵ Other strategies include capping the total number of tobacco retailers based on population size - a model used in Hungary, where only one

¹⁰ 28 April 2016, National Library of Medicine, Ackerman, Etow, Bartel and Ribisl, [Reducing the Density and Number of Tobacco Retailers: Policy Solutions and Legal Issues](#)

¹¹ Ibid.

¹² Ibid.

¹³ [National Tobacco Strategy 2023-2030, pg 23.](#)

¹⁴ [August 2024, Victorian Parliament Public Accounts Committee Inquiry Vaping and tobacco controls.](#)

¹⁵ 28 April 2016, National Library of Medicine, Ackerman, Etow, Bartel and Ribisl, [Reducing the Density and Number of Tobacco Retailers: Policy Solutions and Legal Issues](#)

tobacco shop is permitted per 2,000 residents.¹⁶ Similarly, San Francisco has both capped the total number of retailers per district and banned new outlets from opening within 500 feet of an existing store.¹⁷

- 5.6 A phased approach is recommended to bring existing tobacco retail numbers within allowable limits over time, which could gradually reduce the number of retailers by allowing limited new licences only when existing licences lapse or are revoked.
- 5.7 These regulatory strategies, if adopted in NSW and nationally, would meaningfully reduce tobacco availability and youth access and exposure, helping to curtail smoking uptake and ultimately improving community health outcomes. I strongly encourage the Inquiry to consider these measures as part of an effective, evidence-based approach to tobacco control.

¹⁶ Ibid.

¹⁷ Ibid.

6. TOBACCO PRODUCT MARKETING IN RETAIL ENVIRONMENTS

- 6.1 Preventing the initiation of smoking by young people is a global public health priority and remains a central rationale for restricting tobacco marketing. Despite regulatory efforts, tobacco retailing stores in Australia continue to serve as a key pathway through which children and adolescents are exposed to both direct and indirect tobacco marketing. Recent data show that 13.5% of school students aged 12-17 reported ever smoking in 2022-23.¹⁸
- 6.2 Emerging research shows that adolescent exposure to tobacco-related products can be associated with increased long-term tobacco use. Exposure to tobacco retailing, even in the absence of overt advertising, has been linked to increased likelihood of experimentation, initiation, and eventual uptake of smoking among minors. Retail signage, price lists, and the general visibility of tobacco product availability can act as triggers to purchase and reinforce the perception that tobacco use is normal or socially acceptable.
- 6.3 There is widespread visibility and accessibility of tobacco retailing across Australian shopping precincts in malls, centres and high streets, which are frequented by youth. Many tobacco retailers are located near youth-focused businesses and often feature child-attractive elements such as toys, confectionery, and colourful displays in their windows or at their entrances - effectively functioning as a form of indirect marketing to children.
- 6.4 There are several regulatory gaps that leave children unnecessarily exposed to tobacco promotion in retail environments. These include:
- The absence of restrictions on the location of tobacco retailers, including proximity to schools, playgrounds, or youth services.
 - Laws in some jurisdictions still allow minors to sell tobacco products.
 - No bans exist on child-friendly displays - such as toys and lollies - in tobacconist windows or at their entrance points.
 - Lack of prohibitions on selling tobacco in shops that primarily cater to children.
- 6.5 These gaps present a clear and urgent opportunity to strengthen tobacco control laws. To better protect young people from the harmful influence of tobacco marketing, state and federal governments should consider:
- Prohibiting tobacconists from using toy or confectionery displays in shopfronts or entrances.
 - Restricting access of children and minors to tobacconist premises.
 - Establishing zoning and density restrictions to limit the number and location of tobacco retailers.

¹⁸ [27 June 2025, AIHW, Alcohol, Tobacco & Other Drugs in Australia.](#)

- Separating the sale of tobacco from general retail environments entirely, phasing tobacco out of mixed-business models (e.g., supermarkets and convenience stores), in line with best practice examples such as that of the Netherlands.

6.6 As recommended by Gartner et al. (2021) in the *Medical Journal of Australia*, Australian governments should support retailers in transitioning away from tobacco sales as part of a long-term vision for a smoke-free society.¹⁹

¹⁹ [15 Nov 2021, Gartner, Wright, Hefler, Perusco, Hoek, It is time for governments to support retailers in the transition to a smoke-free society.](#)

7. LICENSING SCHEMES

- 7.1 Australia currently lacks a coherent national approach to tobacco licensing, despite long-standing federal policy commitments to a 'consistent whole-of-government approach to tobacco control.'²⁰ This includes the stated goal of implementing 'a consistent licensing scheme covering all aspects of the tobacco supply chain in Australia,' as outlined in the National Tobacco Strategy.²¹
- 7.2 At present, tobacco retail licensing is administered separately by states and territories, resulting in a patchwork of regulations and enforcement standards. Achieving the national consistency envisioned in the National Tobacco Strategy could be realised through a federal licensing standard - similar to the approach used for medicines and poisons under the Commonwealth Poisons Standard - which states and territories then adopt and implement through their own legislation. This model would ensure uniform minimum standards while respecting local regulatory authority.
- 7.3 In 2020, the Commonwealth Parliamentary Joint Committee on Law Enforcement on Illegal Tobacco recommended that the Australian Government explore options for a nationally consistent licensing regime.²² The committee noted that this scheme should include the licensing of tobacco products, manufacturing supplies, and equipment, and could be most effective if implemented alongside a track-and-trace regime. Such a system would allow for better oversight of the tobacco supply chain and provide authorities with tools to identify and disrupt illegal activity.
- 7.4 Currently, there are no national or state-based restrictions on the number of tobacco retailers or where they may operate. This lack of constraint presents a serious challenge to enforcement and monitoring. Evidence presented to the Victorian Parliament's Public Accounts and Estimates Committee Inquiry on Vaping and Tobacco Controls (2023) recommended the introduction of retail density limits, including a cap on the number of licences issued in each local government area and a prohibition on tobacco retailers operating within 150 metres of a school.²³ These measures would help reduce youth exposure and improve the effectiveness of compliance checks.
- 7.5 In addition, there is an urgent need for greater transparency in the administration of tobacco retail licences. Jurisdictions should be required to publicly report the number of licences issued, voluntarily surrendered, not renewed, or suspended and cancelled - along with the reasons for these actions. This data, broken down by local area, would support better policy evaluation, reveal trends in tobacco retailing (including the rise of new tobacconists), and improve community confidence that the law is being enforced.
- 7.6 Finally, to effectively address the scale and complexity of illegal tobacco and vaping product supply, Australia must establish a permanent national illegal tobacco and vape intelligence capability, beyond the current remit of the Illegal Tobacco and E-cigarette Taskforce. This would support national coordination of enforcement, intelligence sharing across jurisdictions, and evidence-based policy responses.

²⁰ [National Tobacco Strategy 2023-2030, pg 23.](#)

²¹ Ibid.

²² [2020, Parliamentary Joint Committee on Law Enforcement – Illegal Tobacco](#)

²³ [August 2024, Victorian Parliament Public Accounts Committee Inquiry Vaping and tobacco controls.](#)

8. PENALTIES FOR ILLEGAL IMPORTATION AND ENFORCEMENT

- 8.1 Australia has operated under a fragmented enforcement regime for illegal tobacco, with penalties varying between federal and state jurisdictions. At the federal level, the Australian Border Force (ABF) Force and Australian Tax Office (ATO) seized over 1,750 tonnes of illegal tobacco in 2024, however this represented a 19% decrease in total volume seized compared to 2023 - suggesting that significant quantities are coming into the country undetected. Concerns have been raised recently that only a small percentage of incoming containers are inspected by ABF, and ATO officers don't have the resources, or the desire, to pursue organised crime gangs for a few hundred thousand dollars of excise and risk personal safety repercussions.²⁴
- 8.2 At the state level, enforcement remains under-resourced: for example, NSW - with only 28 authorised inspectors overseeing thousands of tobacco retailers - often responds to breaches with minor on-the-spot fines rather than maximum penalties. Tough penalties exist in South Australia - first-offence fines can reach \$750,000 for advertising or selling without a licence, with penalties rising to \$1.1 million for repeated breaches; sales to minors or possession for sale carry penalties of up to \$1 million for a first offence, rising to \$1.5 million²⁵. Queensland has followed suit with harsher penalties and closure orders and new NSW legislation (effective mid-2025) includes offences for commercial possession or sale of illegal tobacco punishable by up to \$1.5 million and seven years' imprisonment, along with closure orders of up to 12 months for non-compliant premises.²⁶ Victoria has similarly introduced licensing requirements (with fit-and-proper-person tests) and penalties of up to \$1.7 million for businesses and jail terms of up to 15 years for individual.²⁷
- 8.3 Despite these advances, improvements are needed at both state and federal levels around the country to close enforcement gaps:
- **Increase resourcing and staffing** for tobacco enforcement, including expanding inspectorate and authorising broader police involvement, especially in NSW.
 - **Mandatory licensing schemes** with fit-and-proper ownership tests, background checks, and licence revocation powers (modelled on Victoria's system) to prevent unscrupulous operators entering the trade.
 - **Unified federal legislation** setting baseline maximum penalties and closure powers, to ensure all states have capacity to pursue serious offences involving commercial or large-scale illegal tobacco handling.
 - **Mandated public reporting** of enforcement data: number of warnings, fines, prosecutions, licence suspensions or cancellations per area.
 - **Integrated intelligence systems and permanent national illegal tobacco taskforces** to support real-time information-sharing, coordinated investigations, and targeted disruption of organised networks across jurisdictions.

²⁴ [Illegal tobacco is a deadly \\$10 billion industry wiping out legitimate businesses - ABC News](#)

²⁵ [SA's new penalties tackling illegal tobacco and vapes take effect | Consumer and Business Services](#)

²⁶ [Suite of tough new illegal tobacco measures unveiled](#)

²⁷ 12 Nov 2024, The Guardian, Benita Kolovos, [Victoria seeks to snuff out tobacco wars with nation's 'toughest' cigarette sales rules and 'fit and proper persons' test | Victoria | The Guardian](#)

9. PUBLIC AWARENESS CAMPAIGN

- 9.1 A targeted public awareness campaign is urgently needed to educate the community about the harms and consequences of illegal tobacco. Many consumers are unaware that purchasing illegal tobacco supports organised criminal networks, undermines public health objectives, and contributes to significant tax evasion that deprives governments of revenue used to fund health and social services. A well-designed campaign should highlight the legal risks associated with selling or purchasing illegal tobacco, the potential health dangers of unregulated products, and the broader social harms caused by the illegal tobacco trade. Increasing public understanding of these issues is essential to reduce demand, support compliance efforts, and foster community support for stronger enforcement and regulatory measures.

10. CONCLUSION

- 10.1 The illegal tobacco trade poses an ongoing threat to public health, community safety, and lawful commerce in NSW. This submission calls for the adoption of a nationally coordinated, community-informed, and enforcement-led approach to reform. By acting decisively nationwide to cap retailer numbers, limit store locations, strengthen regulation, protect children from exposure to tobacco-related products and undertake a targeted public awareness campaign, we can improve our response in combatting the illegal tobacco crisis more effectively.