

The Thoracic Society of Australia and New Zealand response to the National Tobacco Strategy 2022-2030 Consultation

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Introduction

The Thoracic Society of Australia and New Zealand (TSANZ) is a health promotion charity whose mission is to lead, support and enable all health workers and researchers who aim to prevent, cure, and relieve disability caused by lung disease. TSANZ is the only Peak Body in Australia that represents all health professionals working in all fields of respiratory health.

The TSANZ has a membership base of over 1800 individual members from a wide range of health and research disciplines. The TSANZ is a leading provider of evidence-based guidelines for the treatment of respiratory disease in Australia and New Zealand and undertakes a large amount of professional education and training. The TSANZ is also responsible for significant research administration and coordinates an accredited respiratory laboratory program.

As the leaders in lung health, we promote the:

- highest quality and standards of patient care
- development and application of knowledge about respiratory health and disease
- highest quality air standards including a tobacco smoke free society and effective regulation of novel nicotine delivery systems
- collaboration between all national organisations whose objects are to improve the wellbeing of individuals with lung disease and to promote better lung health for the community
- professional and collegiate needs of the Membership

The TSANZ thank the Department of Health (DoH) for the opportunity to respond to the consultation on the Draft National Tobacco Strategy 2022-2030. Tobacco remains the leading cause of preventable death and a primary risk factor for many non-communicable diseases such as chronic lung disease, cardiovascular disease, diabetes, and cancer. Despite recent declines in tobacco use, 11% of Australians are still smoking daily, and 22% of all cancers, 78% of lung cancer, and 41% of respiratory disease can be attributable to smoking¹. Page 3, Figure 2 of the Draft strategy reports that tobacco use contributes to ten of the top 15 highest total burden (DALYs) in Australia, where respiratory diseases make up three of the 10, and two of those (COPD and lung cancer) far outweigh the others. The proposed strategy made by the Department of Health will have a large impact on the field of respiratory health, Thoracic Society members, and subsequently the many patients who we support and treat whose lives are impacted by tobacco. We will continue to advocate through evidence-based practice and policy to improve respiratory health for all.

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Consultation Topic

The Australian Department of Health is seeking stakeholder feedback on the Draft National Tobacco Strategy (NTS) 2022-2030 through a survey consisting of six (6) questions.

TSANZ Feedback

The Thoracic Society is supportive of the Draft National Tobacco Strategy. Ending tobacco use in Australia is an urgent priority the Thoracic Society highly endorses. A target of $\leq 5\%$ daily smoking by 2030 would result in significant benefits, including improved quality of life, reduced health service utilisation, reduced disease burden, and help close the socioeconomic and health inequality gaps caused by tobacco for smokers, their families, and the wider Australian population. The Thoracic Society has addressed each individual question posed by the Department of Health in further detail below.

1. Do you agree with the goals and smoking prevalence targets for the draft NTS 2022-2030? Please provide an explanation for your selection.

The Thoracic Society strongly agree with the goals and smoking prevalence targets. We acknowledge that it will take exceptional investment and coordinated efforts across Government, Industry and Not-for-Profits to reach the ambitious national daily smoking prevalence target of less than 10% by 2025, and 5% by 2030. However, Australia's history pioneering tobacco control policies and practices, will provide a solid foundation for the aspiring aims needed to maintain this global leadership status.

2. Do you agree with the objectives for the draft NTS 2022-2030? Please provide an explanation for your selection.

The Thoracic Society agree with all objectives listed in the draft NTS 2022-2030. We note that denormalisation of the tobacco industry is the priority listed last, however, if denormalisation was successful, it would have substantial benefits and implications across all other listed objectives. We therefore recommend this objective be moved towards the top of the list. The Thoracic Society emphasises the need for greater access to evidence-based and proven quit smoking services that is equitable and affordable. Pressure must continue to be applied on reducing the uptake of tobacco use among new smokers, particularly in light of concerning trends showing dramatic increases in uptake of electronic nicotine delivery systems among youth, where between 2016 and 2019 a 275% increase was observed for youth aged 18-24 years, and 380% increase for youth aged 25-29 yearsⁱ. This is of particular concern as evidence shows that use of electronic products are associated with a three-fold increase in taking up cigarette smoking among never smokersⁱⁱ. Therefore, objectives to prevent and reduce harms associated with the marketing and use of novel and emerging products is essential to preventing a new wave of tobacco users in Australia.

Any objective which intends to boost access to quit supports for existing tobacco users must also be a key focus of the NTS. We recommend prioritising financial investment to maximise use of existing assets and infrastructure proven to be effective, such as prescription for evidence-based pharmacotherapy in combination with gold-standard behavioural counselling through Quit lines. This will require improved delivery and prioritisation of health professional training to deliver brief advice to smokers, which will likely need a change in attitudes by senior management and executive teams to make tobacco control efforts a priority in practice, rather than a luxury service that is

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largely delivered ad hoc in clinical services with perceptions that it is someone else's job to support quit attempts.

Focussed objectives prioritising prevention of new smokers and support to quit for existing smokers who are experiencing inequality gaps, disadvantage and are at higher risk for tobacco use, is also an essential target that must receive adequate attention. Importantly, there are many silos operating in practice where efforts are being duplicated and valuable assets are not shared. A coordinated approach needs to be re-worked to maximise the value of investment for finite resources.

3. Do you agree with the guiding principles for the draft NTS 2022-2030? Please provide an explanation for your selection.

The Thoracic Society recommend prioritising smoking cessation and denormalisation of the tobacco industry as a primary guiding principle, given the cascading impacts that will be seen across all other stated objectives. The Department of Health must continue to work together with appropriate stakeholders in partnership to make evidence-based change, as stated in the guiding principles, however, the strategy for how partnership and engagement will happen needs a significant reorganisation as the current approach is not working effectively. There are inordinate amounts of tobacco control research occurring through universities, local government agencies, in clinical care and through not-for-profit organisations. Effective channels to funnel these assets into clinical practice, policy decisions and for public use, are near non-existent. This is resulting in considerable duplication of efforts, ineffective use of finite financial investments and a potential asset bank of diverse and comprehensive quit smoking solutions that are not being used to their full potential. A first step to implementation of this NTS should be a mass outreach initiative with an open invitation to any and all potential partners who are not conflicted with links to the tobacco industry.

Article 5.3 of the World Health Organisation (WHO) Framework Convention on Tobacco Control requires public officials to protect public health policies in relation to tobacco control "from commercial and other vested interests of the tobacco industry". Recent moves by Big Tobacco companies such as Phillip Morris International's acquisition of British healthcare company Vectura have caused concerns in the medical and research field, as many individuals are now inadvertently linked to Big Tobacco through their ties with Vectura. The Department of Health should take necessary precautions when consulting with stakeholders to ensure Big Tobacco's move into the health sector is met with scepticism. Past policies and campaigns by the DoH have caused a steady decline in smoking rates over the last 20 years¹, and so continued pressure on tobacco companies as well as the development of Australian policies to combat the tobacco industry are paramount in reducing tobacco use in Australia.

4. Do you agree with the priority areas for the draft NTS 2022-2030? Please provide an explanation for your selection.

The Thoracic Society are supportive of the priority areas of the draft NTS 2022-2030. Continued awareness of the addictive and harmful properties of tobacco and electronic nicotine delivery systems is required to promote change and develop tobacco control policies. An effective means to do this would be through mass media campaigns to accurately report evidence in relation to tobacco use, vaping, quitting and the tobacco industry, but in a novel and innovative means that engages the public rather than acts as yet another misguided though well-intentioned scare campaign or regurgitation of the same messages about the negative consequences for using tobacco industry products. The public are largely desensitised to these messages, particularly among our young Australians, where the harms and risks are largely known, but ignored due to perceptions of indestructibility synonymous with those young of age or mind. Additional benefit of these

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campaigns would be to promote uptake of existing evidence-based quit smoking services, strategies and treatments known to be effective in helping smokers quit, with instructions on how to access these services, and they would help to counter misinformation propagated by the tobacco industry and inadvertently through media outlets attempting to deliver transparent and balanced public information.

Existing evidence-based strategies and pharmacotherapies are being underutilised. Therefore, efforts to increase uptake of these gold-standard service and treatment models must be a priority, rather than investing in ancillary efforts with unproven efficacy and safety. Strengthened policies and legislation for emerging nicotine technology is required urgently, as the black market surrounding electronic nicotine delivery systems has been left unchecked for too long. This has resulted in reports that current efforts to curtail these illegal practices are ineffective, and they are ridiculed by the black-market industry and the public^{iii,iv,v}.

5. Do you agree with the actions listed under each priority area for the draft NTS 2022-2030? Please provide an explanation for your section.

The Thoracic Society agree with the actions listed under each priority area. Transparency is a priority for all involved in this process. Tobacco companies have been trying to get a seat at the table for policy discussions as recently as the last consultation on the NTS^{vi}. The DoH must ensure there is appropriate governance to support consultations and remove any potential influence that may come from companies or individuals who have conflicts of interest and are not declaring them^{vii}.

The Thoracic Society draw attention to the importance of multifaceted media in this space; public health and awareness campaigns are critical to the success of the NTS. Australians of Aboriginal and Torres Strait Island descent, Culturally and Linguistically Diverse (CALD) backgrounds, and those living in low socioeconomic areas are amongst the worst affected by tobacco and whose partnership and voice must be most heard during consultations surrounding tobacco. It is vital that Aboriginal and Torres Strait Islander people and organisations are prioritised as partners and key stakeholders throughout the whole NTS process, from development through to delivery, evaluation and framing of the next iteration. Similarly, extra efforts should be made to foster agency for individuals within these organisations, involving engagement across all levels within communities, from grassroots to executives within Aboriginal Community Controlled Health Organisations (ACCHOs). This could be further enhanced to focus on empowerment for these communities with provision of resources and support to capacity building community-driven solutions.

Health communication involving young people as ambassadors and partners will help create a culture for the next generation against tobacco, as they are our future leaders, policy makers, and health professionals. The Thoracic Society note that anti-smoking campaigns in Australia have fallen well below the best-practice minimum benchmarks^{viii}. With social media, influencers, and other subliminal advertising strategies used by Big Tobacco^{ix}, it is important that young Australians are empowered with a voice in this space to counter Big Tobacco misinformation, which is supported by the DoH to counter the free flow of this type of marketing. We recommend the Government also consider how we plan to think differently and innovatively, using marketing, behaviour change and pop-culture as weapons against the tobacco industry, rather than continuing to take the blows as Big Tobacco uses all the tricks of the trade with budgets to match. We believe this is an opportunity to do something more than previously attempted in Australia to disrupt the whole of the industry, empowering communities and young people to reject smoking, vaping, and nicotine similar to what has been achieved by California's Truth Campaign^x.

6. Please provide any additional comments you have on the draft NTS 2022-2030.

The Thoracic Society recommend the development of an implementation plan and strategies for the NTS 2022-2030 which should also undergo an opportunity for feedback, by those without conflicting interests to the NTS. This plan should include facilitating stakeholder partnerships and collaborations to support implementation and should be linked with the introduction of national legislation and regulatory frameworks, which in turn will provide a structure to better support the NTS. The Thoracic Society recommends also linking this implementation plan to the budget to ensure its rollout is consultive and effective.

Concluding Remarks

The National Tobacco Strategy 2022-2030 is a strategy which aims primarily to improve the health of all Australians by reducing the prevalence of tobacco use and its associated health, social, environmental and economic costs, and the inequalities it causes. The Thoracic Society supports this strategy and thank the Department of Health for the opportunity to respond to this consultation. We hope to continue working together as the strategy is implemented, to tackle respiratory health issues and to improve respiratory health for all Australians.

Yours sincerely,



Professor John Upham
MBBS FRACP FThorSoc PhD
TSANZ President

References

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