

RESPONSE TO THE PROPOSED BAN ON THE PUBLIC DISPLAY OF TOBACCO PRODUCTS AT POINTS OF SALE

This is a letter from Skruf Snus AB, Sweden, to the Health and Social Ministry's consultation regarding its proposal to introduce a ban on visible display of tobacco products at points of sale.

One of our snus brands, Skruf, is available and on sale in Norway with an approximate market share of 9% of the total Norwegian snus market and, as a consequence, we would like to take this opportunity to present our view on the proposal and request that an alternative solution be found.

Skruf Snus fully supports and understands the need for fair and workable regulation regarding the display and selling of snus products. Our major concern regarding the proposal is that if the consumer is prevented from seeing the full range of snus products available, this will hinder free trade and will distort the competition between different snus manufacturers.

It is highly likely that the bigger manufacturers with the largest and most established brands will stand to gain from the proposed ban, whereas smaller and/or newer manufacturers, such as Skruf Snus, will struggle to compete in an environment where the consumer is unable to see the product choice available. The display of products at the point of sale is a vital part of a consumer's purchasing process. If this possibility is removed, it will hinder the development of smaller or 'niche' brands and will probably lead to outlets deciding not to stock these brands.

In summary, Skruf Snus believes that the proposed visibility ban is anti-competitive; favouring the interests of larger, more established companies and brands. It is believed that it will distort competition in a way that is proportionally disadvantageous to a niche or smaller player, such as Skruf Snus and make it difficult for an adult consumer to make an informed choice.

On this basis, Skruf Snus would ask the authorities to consider an alternative, more competitively neutral, strategy to achieve their policy objectives.

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