

19 June 2025



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Dear Sir/Madam

Stroke Foundation's response to the Queensland Government's Tobacco and Other Smoking Products and Other Legislation Amendment Bill 2025

I am writing on behalf of Stroke Foundation to express our support for the proposed amendments to the *Tobacco and Other Smoking Products Act 1998* and the *State Penalties Enforcement Regulation 2014*, to be included in the Tobacco and Other Smoking Products and Other Legislation Amendment Bill 2025.

Stroke Foundation is a national charity that partners with the community to prevent stroke, save lives and enhance recovery. As the voice of stroke in Australia, we stand alongside survivors of stroke and their families, healthcare professionals and researchers, and build community awareness, foster new thinking, and support survivors on their journey to live the best possible life after stroke.

There are an estimated 9,098 stroke events in Queensland annually.¹ More than 89,000 survivors of stroke are living in Queensland.¹ The lifetime costs associated with strokes that occurred in Queensland in 2023 exceed \$3.2 billion (\$366,000 per person), including healthcare, lost productivity and unpaid carer costs.¹ Research shows that without a concerted effort to improve stroke prevention and awareness, the number of stroke events in Australia is expected to nearly double by 2050.¹

More than 80 percent of strokes can be prevented through addressing key modifiable risk factors, including smoking, uncontrolled high blood pressure, obesity, excess alcohol consumption, and high cholesterol.² Stroke Foundation is committed to reducing the number of preventable strokes in Queensland through programs such as our successful *My health for life* behaviour modification program, which is being delivered in partnership with the Queensland Government and the Healthier Queensland Alliance. This program is empowering Queenslanders to stay well and reduce their risk of developing chronic conditions, including stroke.

People who smoke are twice as likely to have a stroke compared with those who have never smoked.³⁻⁶ The more an individual smokes the greater their risk of stroke.⁴

Importantly, an individual's risk of stroke decreases after they quit smoking, and stopping smoking has been shown to have both immediate and long-term health benefits.⁷ Two to five years after quitting, there is a large drop in an individual's risk of stroke,⁷ and after 15 years their risk of stroke is similar to that of a person who has never smoked.⁷ As such, Stroke Foundation is strongly supportive of measures to reduce the prevalence of smoking in the Queensland community.

The highly successful approach to tobacco control by Australian governments (comprised of public health policy initiatives including health promotion, increased taxation on tobacco products, and tobacco advertising and plain packaging legislation) has had a significant impact on the prevalence of smoking over the last three decades. It is likely that the fall in the prevalence of smoking in the Australian community over the last thirty years, resulting from the Australian Government's tobacco control initiatives, has contributed to the observed reduction in the rate of stroke events over the same period.⁸

There are now significant concerns that the emergence in recent years of vaping products, including e-cigarettes, may erode the gains that have been made over the last 30 years in reducing smoking rates

and exposure to tobacco smoke, particularly among younger Australians. There are also concerns about the harms caused by these products.

In the last few years, data from the Australian Taxation Office and Australian Border Force have shown notable increases in illicit tobacco seizures across Australia.⁹ The illicit tobacco and other nicotine product market perpetuates the use of these products, and Stroke Foundation is concerned about the impact that this growing market could have on smoking prevalence in the Australian community. This illicit market also has a number of other serious consequences, including unique health risks (in addition to the well-established negative health impacts of tobacco), significant losses in tax revenue and the funding of organised crime.⁹

While price is a major driver of illicit product use in Australia (which has been made worse by the ongoing cost of living crisis), research from Australia and internationally suggests that this is not the case for all consumers.⁹ Therefore, further research is needed to determine the various other factors that are driving increased use of illicit products in Australia.

The proactive monitoring and enforcement of laws, including increased prosecution of retailers selling illicit products, are examples of policy measures that could address this growing market in Australia.⁹ It has been suggested that the participation of organised crime syndicates in the illicit tobacco and other nicotine product market has been inadvertently encouraged by the lower penalties associated with the supply of these products, compared with other addictive substances such as cannabis and methamphetamine, making this market extremely profitable.⁹ Therefore, the introduction of meaningful penalties to discourage the involvement of retailers and criminal syndicates in the sale of illicit products may be another effective strategy to halt this trade in Australia.⁹

In 2024, Stroke Foundation supported the Queensland Government's proposed changes to the *Tobacco and Other Smoking Products Act 1998*, which were focused on the illicit tobacco and other nicotine product market, and complemented the reforms introduced by the Federal Government during the same period.

We note that since these reforms were implemented last year, the Queensland Government has introduced the highest on-the-spot fines of any state or territory in Australia, and has significantly boosted enforcement activities, with regard to illicit tobacco and vapes. These initiatives are delivering results, with Queensland Health, supported by the Queensland Police Service and the Therapeutic Goods Administration, seizing Australia's largest ever haul of illegal cigarettes and vapes by a health authority in March this year, followed by Queensland retailers being hit with more than \$5 million in fines in April.¹⁰

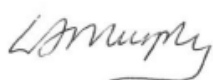
Unfortunately, despite these successes, illicit tobacco and vapes are still readily available in a variety of Queensland retailers. Therefore, Stroke Foundation welcomes the further legislative reforms proposed in the Bill, aimed at cracking down on retailers that fail to comply with the law, reducing the profitability of the illegal market, and strengthening frontline enforcement.

Finally, in addition to continuing to invest in supply-side restrictions such as these, we strongly support continued investment by all Australian governments in nicotine demand reduction strategies.

We commend the Queensland Government's ongoing efforts to ensure that Queenslanders are among the healthiest people in the world by 2026, through concerted action to promote healthy behaviours and prevent illness.

Thank you for the opportunity to provide feedback on the Bill.

Yours sincerely



Dr Lisa Murphy
Chief Executive Officer
Stroke Foundation

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