



**NATIONAL SECRETARIAT**

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*Preventative Health Taskforce Secretariat  
Population Health Strategy Unit  
Department of Health and Ageing  
MDP 16  
GPO Box 9848  
CANBERRA ACT 2601*

*Dear Sir/Madam,*

*The Australian Airports Association gratefully acknowledges the opportunity to comment upon a specific issue raised in the National Preventative Health Taskforce Paper titled "Australia: The Healthiest Country by 2020".*

*The Australian Airports Association (AAA) is a non-profit organisation founded in 1982 and represents the interests of over 270 airports Australia-wide, from the local country community landing strips to the major international gateway airports. The Charter of the Association is to facilitate co-operation among all member airports and their many and varied partners in Australian aviation, whilst maintaining an air transport system that is safe, secure, environmentally responsible and efficient for the benefit of all Australians.*

*In more general terms the AAA is totally supportive of the Taskforce's aims and objectives, particularly the need for tobacco sales to be highly regulated so as to protect children from unlawful purchase opportunities. However, currently in Australia, tobacco is a legal product for purchase and consumption by those over age 18 – effective retail protocols need to be in place to prevent under-age consumption.*

*As might be expected, the AAA does not support further restrictions on duty free tobacco sales at Australia's international airports. All airports with duty free sales outlets are members of the Association and accordingly, we believe we are uniquely placed to provide the Taskforce with an alternative overview.*

*The following information should be considered in the context of duty free tobacco sales at Australia's international airports.*

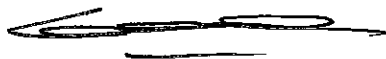
- *The duty free retail environment/experience is not exposed to many passengers under the age of 18 and most, in any event, are accompanied by an adult, normally a parent or for the purposes of international travel, a guardian;*
- *Our research suggests that less than 10% of international passengers passing through Australia's airports, are under the age of 18;*

- *The duty free retail environment at each airport already treats tobacco sales differently to other product offerings. There is no product promotion, customer communication is limited to price information and any tobacco product display is limited to one area within each store;*
- *It is a retail environment where obtaining accurate age identification is not an issue – all customers carry a current passport;*
- *Duty free shopping in Australia is an established and integral part of the international travel and tourist experience for overseas visitors;*
- *Shopping is rated the No. 3 activity (after sightseeing and eating) for tourists visiting Australia and approximately 45% of tourist shopping is duty free purchases;*
- *For many international visitors, the controlled purchase of tobacco products is an important aspect of their shopping experience – around 20% of duty free transactions (not revenue) contain tobacco products;*
- *Both overseas and Australian customers enjoy one of the best and most competitive tax and duty free shopping experiences available in the world – maintaining such an internationally competitive duty free retail offer is critical to Australia's continued attractiveness as a tourist destination;*
- *Any changes to current duty free sales access at Australia's airports will simply see purchases of tobacco products move offshore to airports in other countries with a consequent impact on jobs in Australia – a great many sales staff are involved in duty free sales at Australia's airports. Why put their jobs at risk by simply transferring a sales opportunity to another country that does not necessarily share Australia's commitment to good health and happiness?*

*Finally, the AAA believes that reputable retailers should be able to sell lawfully available tobacco products to customers above the legal age. While supporting the majority of issues outlined in the discussion paper, we are concerned about the likely unintended consequences of proposed changes to tobacco sales at airport duty free outlets. Such changes would negatively impact on competition, revenue, employment, international tourism and further investment at Australia's international gateway airports.*

*We wish the Taskforce well with their deliberations on what is a difficult consumer-related matter for international passengers travelling to and from Australia.*

*Yours faithfully,*



*Ken Keech  
Chief Executive Officer*