



Public Health Directorate
 Box SH1108
 Cambridgeshire County Council
 Shire hall
 Castle Hill
 Cambridge
 CB3 0AP

1 March 2019

Dear Licensing Team,

Re. Review of a premises licence (Polska Chata, 50 Market Place)

I am writing to support the application for the review of the premises licence for the above property.

I am a Consultant in Public Health working in the joint public health team in Cambridgeshire County Council and Peterborough City Council. The Director of Public Health is a responsible authority under the Licensing Act 2003, and is responsible for promoting and protecting the health and wellbeing of the local populations they serve.

I have significant concerns about the impact of selling illicit tobacco on the health of the local community and summarise the key evidence around the harmful health impacts of this activity here.

Smoking prevalence in Fenland:

Smoking prevalence in Fenland has significantly declined in recent years with adult smoking rates falling from 28.1% in 2011 to 16.3% in 2017¹. This demonstrates an important public health success and will be due to a number of different factors, including national legislative changes, the delivery of smoking cessation services and wider tobacco control activity, including enforcement services.

However, 16.3% of the local population are still smoking. This is still higher than the regional and national averages and presents a significant health risk to smokers and those around them. We also know that certain groups in our community have higher smoking rates than this, and smoking is a significant cause of health inequalities. The smoking prevalence rates in routine and manual workers in Fenland is considerably higher than the average at 23.4%.

The impact of smoking:

The National Tobacco Control Plan (2017)² clearly summarises the significant impact of smoking on our health and society. Smoking remains the single largest cause of preventable deaths and one of the largest causes of health inequalities in England. More than 200 people a day die from smoking related illness which could have been prevented. Many of the conditions caused by smoking are chronic illnesses which can be debilitating for the sufferer and make it difficult to carry out day to day tasks and engage with society and the economy.

¹ Local prevalence figures are taken from the Local Tobacco Control Profiles published on the Public Health England fingertips website.

² Information about the impact of smoking is taken from the National Tobacco Control Plan for England, published in 2017 and found here: <https://www.gov.uk/government/publications/towards-a-smoke-free-generation-tobacco-control-plan-for-england>.

Smoking is estimated to cost the national economy in excess of £11 billion per year, with £2.5 billion of this falling to the NHS, £5.3 billion falling to employers due to smoking breaks and absenteeism, and £4.1 billion falling to wider society, due to unemployment, economic inactivity, social care and wider costs associated with issues such as illicit tobacco and organised crime.

Illicit tobacco:

Illicit tobacco, including illegally manufactured cigarettes, counterfeit cigarettes and smuggled cigarettes, is a growing issue. As consumption of non-illicit tobacco has decreased over recent years, the volume of use of illicit tobacco has remained stable and the market share of illicit tobacco has therefore increased³. This presents a significant public health concern:

- The sale of illicit tobacco undermines public health efforts to reduce smoking prevalence by increasing the availability and affordability of tobacco products.
- Illicit tobacco has not been subjected to the same stringent testing for quality control and regulation that governs tobacco generally and therefore may contain even more harmful chemicals and toxins than are permitted by these tests.
- There is also concern that children and young people may be easier to target by the low price and unregulated packaging that accompany illicit cigarettes, and they may therefore act as an easier gateway into smoking.
- Illicit cigarettes do not comply with the legal requirements designed to reduce the chances of unattended lit cigarettes starting a fire, and therefore present fire safety concerns.
- Illicit tobacco damages legitimate business within our community. Tobacco smuggling is serious organised crime and the proceeds made from it are used to fund further criminality, perpetuating the cycle of harm.

In summary, given the significant burden of illicit tobacco on the health of the community, I support the review of the premises licence for Polska Chata (Little Europe) due to the illicit tobacco activity identified on site in January 2019.

Yours sincerely,



Katie Johnson
Consultant in Public Health
Cambridgeshire County Council & Peterborough City Council

³ Source: Local Tobacco Control Profiles, Public Health England.