



The Director
Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601

SUBMISSION RE: British American Tobacco Australia Limited & Ors application for authorisation A91550

Thank you for the opportunity to provide our submission.

We at Cigarettes Tobacco and Cigars (CTC) Pty Ltd are the largest tobacconist franchise group in the New South Wales market place and one of the largest tobacconist retail groups within Australia, we have over 180 retailers engaged in the business of selling tobacco products and have done so for over 60 years.

On behalf of our franchisees and management group we support the need to drive illicit tobacco products out of our industry and have regularly been at the forefront of assisting the tobacco companies in this effort. We at CTC would like to make the following points in relation to the application by the applicants:

- All manufacturers have the proposed measures already in place and regularly act with our support on stores found to sell illicit tobacco.
- Stores who are found to sell illicit tobacco products and who are denied delivery by the manufacturers will be less inclined to offend if there is a holistic approach.
- Consumers will be protected from unsafe products that do not meet quality standards.
- Loss of excise revenue can be curtailed by stopping retailers from dealing in illicit tobacco.
- We believe that the focus should be on the importers and distributors of the illicit tobacco products and that manufacturers and law enforcement should continue to invest more and build focus on those areas.

If the Adjudication branch would like further information please contact us directly.

Yours Sincerely

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