

7.5

Policy Interventions: Packaging and Labelling of Tobacco Products

Several studies have revealed that many smokers still do not know that tobacco causes disease and premature death, while many others know little beyond a vague notion that ‘smoking is bad for you’, even in developed countries such as the USA.⁸⁴ This is even more true of developing countries and of non-smoking forms of tobacco use. Thus, in developing countries such as India, there is a clear need for effective ways to alert tobacco users about tobacco-related health risks associated with all forms of tobacco use and inform them about the benefits of quitting.⁸⁴

Consumer protection laws in some countries require that information be provided to smokers about the health effects of tobacco use.⁸⁴ A tobacco product manufacturer generally has a legal duty to warn consumers of any foreseeable hazards associated with the product so that consumers may exercise ‘informed choice’ in deciding to use the product. While many tobacco users in the world generally know that tobacco use is harmful, studies have shown that most smokers are unaware of the true risks, even in countries in which there is a great deal of publicity about the health hazards of tobacco. Smokers tend to be even less aware of the risks of tobacco smoke on others.⁸⁵ The information provided on the packaging of tobacco products is an obvious and essential mode of communicating these messages to tobacco users.

Many countries have introduced regulations related to the packaging and labelling of tobacco products. The Government of India, in the Cigarette Act, 1975 had called upon all packages and advertisements of cigarettes to carry a

statutory warning, ‘Cigarette smoking is injurious to health’. The Act provided specific instructions related to minimum font size, colour contrast, etc. However, these guidelines were often not followed.⁸⁵ A recently enacted legislation for tobacco control, the Cigarettes and Other Tobacco Products Act, 2003 contains provisions such as inclusion of a mandatory health warning, which is legible and conspicuous (detailed in Section 6.1).⁸⁶

The FCTC has provided guidelines for the packaging and labelling of tobacco products and called upon countries to adopt and implement, in accordance with their national laws, effective measures to ensure that tobacco product packaging and labelling do not promote a tobacco product by any means.⁸⁷

Effectiveness of health messages

There is sufficient evidence to show that prominent health warnings and messages on tobacco product packages increase both the awareness of risks and the desire to quit among smokers. The rotation of messages has been found to help in keeping this information from becoming stale and boring. Health messages continue to be effective, even if the population has become more informed about the dangers of tobacco use over time, provided the messages are sufficiently prominent and contain hard-hitting factual information. It was reported that, in Brazil, calls to the Quit Tobacco hotline for cessation assistance increased by almost 300% after picture-based warnings were introduced.⁸⁸

The tobacco industry has responded to these packaging regulations by devising methods to evade or subvert the spirit of health warnings and reduce their efficacy. In recognition of such industry tactics, it is advisable to include prescribed messages on individual sticks of smoked products and individual portion pouches of smokeless products.⁸⁸

In Canada, there has been widespread support for the health warnings on cigarette packages.

For most people, these warnings are an accurate and important source of information. Most smokers have been found to read the health messages every day. More than 7 in 10 adult smokers and almost 9 in 10 youth smokers consider health warnings to be effective as they inform them about health effects, compel them to smoke less around other people, make smoking less attractive and increase their desire to quit smoking.⁸⁹

Smokers who read, think about and discuss health warnings are more likely to quit, attempt to quit or reduce their smoking. Health warnings would be more effective if their content is more positive and if the negative messages about the health impacts of smoking are combined with positive messages about the benefits of quitting smoking.⁸⁹

Experience from other countries shows that for youth smokers, cigarette packaging is a major source of information about the health effects of smoking. It is reported that youth smokers look at the packaging more often than adult smokers and they are frequent readers of health information messages on the back panel of cigarette slide-and-shell packs.⁸⁹

Studies from Canada indicate that tobacco labelling should be such that even people with low literacy skills are able to read and understand the messages. If the words, images and concepts used in the health warnings are unable to communicate the message effectively to this group, they are more likely to reject the messages than make an effort to understand them.⁸⁹

In developing countries, it is important to target people who consume tobacco products, as not many of them have access to information about the hazards of smoking. Large health warnings are likely to detract them from the glamour and appeal of tobacco packages, making them less likely to be seen as stylish accessories. Strong warnings might also help to create a social milieu where non-smoking is the norm. They might motivate smokers to find help if they want to quit.⁸⁴

Health warnings are weak, small or non-existent in many other parts of the world, especially in developing countries. It has been reported that more than 40 developing countries do not require any warnings at all.⁸⁴ Developing countries receive inferior information about the hazards of smoking, which is not justifiable, especially since about 80% of the world's smokers live in developing countries. Therefore, there is a need for detailed specifications to be included in the legislation or regulations governing the information required on tobacco packs, to prevent companies from making health warnings difficult to read or weak in content.⁸⁴

Health warning message labelling on the product package is a critical component of a comprehensive tobacco control strategy. Health warning message labels are a cost-effective way to inform the public, especially smokers, of the hazards of tobacco use. The impact of health warning messages should be regularly evaluated for their effectiveness.⁹⁰

Characteristics of effective health warnings

The WHO and World Bank recommended that effective health warnings should have the following characteristics.⁸⁴

Content

To be effective, health warnings should contain a clear and unequivocal message about the dangers of tobacco use, in simple and stark terms (Box 7.7).⁸⁴ The wording of the message should be simple, in the principal languages of the country. The nature and extent of risk, and how to avoid or reduce the risks should be explained and addressed directly to the reader using the word 'you'. Technical language should always be avoided. The use of marker words, such as 'WARNING', has been suggested.⁸⁴

Information about sources for help in cessation (e.g. a toll-free quit line number, an Internet

Box 7.7 Examples of good warning messages⁸⁴

- Cigarettes are highly addictive.
- Quitting now reduces your risk of serious disease.
- Tobacco smoke hurts babies.
- The smoke from your cigarette harms people around you.
- Smoking causes lung cancer.
- Tobacco can make you impotent.
- Children who see adults smoking are more likely to start smoking.
- Smoking when pregnant harms your baby.
- Smoking causes bad breath, tooth loss and mouth cancer.
- Smoking can cause a slow and painful death.
- Smoking clogs your arteries and causes heart attacks and strokes.

and/or physical address where more information is available, quitting tips, and/or advice which helps in quitting) should also be included. Misleading terms, such as 'light', 'low tar', or 'mild', which give the wrong impression that tobacco at lower tar and/or nicotine concentrations is safer, should be banned.⁸⁴

Format and font

The warning message should be printed in easy-to-read black type on a white background (or vice versa) and large, upper case letters should be used. Glossy surface coatings and metallic inks should be avoided. A flat or matte finish will make the warnings legible under a wide range of lighting conditions. The text should be indelible and irremovably fixed, and a black border should surround the message in a way that does not interfere with the text of the warning or the information given.⁸⁴ There is also evidence that limiting colour choices to black and white, to achieve maximum contrast, also enhances recall. Regulations should be based on performance standards designed to ensure that consumers achieve recall rates of the health warning information comparable to recall rates for other aspects of the package, including brand name.⁹¹

Location

The health warnings should be on the top of the

front and back of the package. The warning should not be hidden or obscured by other written or pictorial matter, or when the packet is open.⁸⁴

Pictures

Experience with pictograms in Canada and Brazil shows that large warnings combined with photos are effective in discouraging smoking and increasing public awareness of the health effects of smoking. In a study conducted among 633 Canadian smokers nine months after new, large pictorial warnings were introduced, 58% reported that the pictures had made them think more about the health effects of smoking; 44% said that the new warnings had increased their motivation to quit smoking; and 38% of the smokers who tried to quit said that the new warnings were a factor in motivating their attempt.⁸⁴ In a study conducted in 2002 among 2216 Brazilians 18 years or older, 3 months after the introduction of new pictorial warnings, 73% of smokers approved of them, 54% had changed their opinion on the health consequences of smoking and 67% said that the new health warnings made them want to quit.⁸⁴ There was a strong impact on low-income and -education groups. In Australia, it was found that stronger warning labels resulted in a 29% increase in the percentage of people who 'always noticed' the warnings, and a 7% increase in people who did not smoke at least once due to the warnings.⁸⁴

In Canada, the top half of the front as well as back of cigarette packages must show one of 16 picture-based warnings. One of 16 additional detailed messages is required inside the package, either on an insert or on the inner 'sliding' part of the package.⁸⁴

Health warning messages with pictures are accessible to illiterate people, and provide significantly more encouragement to quit and to not start smoking than messages without pictures. Pictures will help ensure that even illiterate people receive important information, empowering them to better protect their health. Apart from delivering new information, pictures elicit a visceral response in viewers, so their

Box 7.8 Examples of good pictures⁸⁴

- Human heart with damaged muscles as a result of myocardial infarction
- Healthy lung and a lung with cancer
- Children and pregnant women
- Human brain showing the effects of a stroke
- Diseased mouth

impact is both cognitive (intellectual) and affective (emotional) (Box 7.8). The pictures should always be colourful and of the largest size possible to be effective.⁸⁴

Recently, the European Union come up with 42 hard-hitting picture warnings for cigarette packs to deter people from smoking. Some of picture-based health warnings in Canada and the European Union are illustrated in Figs 7.5–7.8.

Package inserts

Additional health information could be provided through inserts similar to those used with prescription drugs, or on the inner ‘sliding’ part of packages that have them. Along with textual information on tobacco addiction and tips for quitting, inserts should also contain pictures that illustrate the hazards of tobacco.⁸⁴

Timing

The time given to companies to implement new warnings should be just enough to use up existing stocks and print new packages. Although tobacco companies will typically ask for a longer time, a time allowance of 3–6 months has been found to be sufficient.⁸⁴



Fig. 7.5 Canadian health warning providing information on the relationship between smoking and heart attack in Canada⁹²



Fig. 7.6 Canadian health warning providing information on the harmful effects of smoking during pregnancy⁹²



Fig. 7.7 European Union health warning providing information on the relationship between smoking and death⁹³



Fig. 7.8 European Union health warning providing information on the relationship between smoking and heart diseases⁹³

Disclosures of toxic substances

Among more than 4000 constituents of tobacco smoke, over 60 are known or suspected carcinogens. Studies from other countries have reported that many smokers are confused about the constituents of tobacco smoke. Therefore, to exercise informed choice, it is essential that tobacco product packages provide tobacco users with prescribed factual information on the toxic substances contained in the products and their smoke.⁸⁴

However, it is important to recognize the problem with tar, nicotine and carbon monoxide (CO) measurements, and disclosures of these based on current testing methods.⁸⁸ These measurements are now recognized to be misleading. Firstly, human smoking patterns vary greatly and are not mimicked by the machine. Secondly, modern cigarette designs facilitate compensatory smoking (over-inhalation), which may lead to the smoker taking in much greater amounts of tar and nicotine than are measured by the machine. The tobacco industry uses the measurement for its own benefit by using descriptors such as 'light' and 'mild' on packages. Such terms falsely reassure smokers who might otherwise have quit the habit.⁹⁴

Experiences from other countries suggest that the machine-measured figures for tar, nicotine and CO should be removed from the packet, and a realistic measure must be established for regulatory purposes. The health warnings qualitatively deal very well with the risks of smoking, whereas misleading figures on the packet can only do harm.⁹⁴ The WHO's Scientific Advisory Committee on Tobacco Product Regulation (SACTob) also recommends that placing quantitative estimates of tar and nicotine on tobacco products should be avoided. However, consumers should be informed of the existence, if not the levels, of these and other hazardous constituents, such as tobacco-specific nitrosamines, polycyclic aromatic hydrocarbons and a host of others, and of the dangers they pose.⁸⁸

Studies have found that smokers clearly support the inclusion of toxic emissions' information on packaging. One-half of adult smokers and 6 in 10 young smokers look at or read the toxic emissions statements on the side of cigarette packages.⁸⁹

A qualitative study has reported that the most effective texts were short, clear and simple, and presented only one substance with information on the impact that the substance has on health.⁸⁹

Generic packages

From the tobacco industry's perspective, the primary job of the package is to create a desire to purchase and try the product. Therefore, cigarette packaging can act as an advertisement. When advertising is banned or strictly regulated, the package could become a very important marketing tool. With more and more regulations coming up for controlling tobacco, tobacco companies will focus on new areas of opportunity which do not rely on conventional media, such as new types and forms of packaging that can act as a means of communication as well as using famous trademarks from other fields on tobacco products and sponsorships.⁸⁸

Generic packaging is an important tobacco control measure. Generic packaging for tobacco products is plain, standardized packaging stripped of its marketing appeal. The objective of generic packaging is to 'denormalize' tobacco product use and prevent the tobacco package from being an alluring advertisement that undermines health messages, confuses consumers about the risks of tobacco use and otherwise detracts from the government's attempts to ensure that consumers are aware of the hazards of tobacco use. It has been suggested that packages should be generic both inside and outside.⁸⁸

Studies in many countries have found that that plain packaging would reduce experimentation and ongoing smoking among adolescents.⁸⁸ A significant majority of adults refused to buy

Marlboro cigarettes at half-price when they were packaged in generic brown boxes, despite the fact that they were assured of the original quality. Apart from these, health messages on plain packages were found to be more noticeable and their presence more easily recalled than messages on traditional tobacco packages.⁸⁸

Labelling as a measure to control smuggling

Tracking and tracing labelling requirements such as manufacturer identification, countries of origin and destination, tax stamp markings, etc. are important to prevent smuggling. Tracking is the systematic monitoring of the movement of tobacco products from the place of manufacture, where all relevant duties and taxes have been paid, for the purpose of assisting the competent authorities to detect, investigate and analyse illicit manufacture and illicit trafficking. Tracing means the ability of competent authorities to recreate the route taken by a tobacco product from the place of manufacture through the distribution chain to the point where all relevant duties and taxes have been paid.⁸⁸

Package size

Many countries have prohibited the sale of single or unpackaged tobacco products, or packages below a minimum size, which tend to be more affordable and accessible to the youth, who are especially price sensitive. Selling tobacco products in packages also ensures that consumers are provided with the prescribed messages, toxic substance disclosures and other important labelling information. If sales of single cigarettes are prevalent because of a large informal sector, it has been suggested that the manufacturers should place prescribed messages on individual sticks of smoked products as well as on packages.⁸⁸

Size of health warnings

Belgium has the world's largest tobacco warnings

(roughly 55% of the package, front and back) whereas in Brazil, 100% of one principal display panel must consist of a pictorial health warning. In Canada, health messages comprise at least 50% of the package's front and back panels, and provide graphic pictorial depictions showing the health effects of tobacco use.⁸⁸

Ideally, the warning/information label should cover at least 50% of both the front and back of the package. Warnings must be large enough to be easily noticed and read. The credibility of warning messages, as well as the perceived risks from tobacco use, increases proportionately with increases in the size of the warnings.⁸⁴

The tobacco industry's tactics

When Brazil enacted its law requiring graphic pictures on tobacco product packages to accompany its health warnings, the tobacco industry tried to delay implementation, arguing that it did not have the technical capacity to comply with the new requirements for pictures. The tobacco industry often uses such tactics to delay or prevent the implementation of stringent laws against tobacco (discussed in Section 6.5). The industry also argues that there will be economic and job losses in the packaging and printing industries, as well as increased smuggling due to labelling requirements. However, these arguments are without basis and are merely delaying tactics.⁸⁸

Experience from many countries shows that the tobacco industry usually tries to delay or block more effective warnings. Governments should be prepared to face these legal challenges, which are often based on constitutional rights such as free speech, or trade practices. The case for tobacco control measures, including stronger health warnings, is compelling, especially from a human rights' and consumer rights' perspective. Health-warning regulations should specify that displaying health warnings on tobacco products does not relieve tobacco companies of their liability for damage caused by the use of their tobacco products.⁸⁴



Fig. 7.9 Examples of proposed health warnings on tobacco products in India, which are being field-tested⁹⁵

Health warnings on smokeless tobacco products

In India, apart from cigarettes or other smoking tobacco products, smokeless tobacco products should also carry the most effective labels possible, due to the serious risk of disease and addiction they pose, and because smokeless tobacco use is widely prevalent among children and adolescents.⁹¹ Studies on Canadian labels have found 51% higher total recall rates for oral snuff packaging, and 65% higher total recall rates for chewing tobacco packaging, which justifies the requirement of labels that are at least as large as those in Canada.⁹¹

The size of current smokeless tobacco products packages in India is such that they can easily be carried in the pockets and it is very difficult to

recognize the warning messages on them. Therefore, it is advisable to considerably increase the size of smokeless tobacco packages. In addition to conveying proper health warning messages and making them difficult to carry, bigger packages also increase the cost of production for tobacco companies.

Health warnings in India

The Cigarettes and Other Tobacco Products Act, 2003, has asked for the inclusion of a mandatory health warning, which should include a picture of a skull and cross-bones and may include other pictorial warnings.⁸⁶ Figure 7.9 shows some of the proposed health warnings to be used on Indian tobacco packages, which are being field-tested for their effectiveness.

7.5 PACKAGING AND LABELLING OF TOBACCO PRODUCTS

KEY MESSAGES

- The WHO and the World Bank recommended warning labels on tobacco products, which are an effective way to inform smokers about the hazards of tobacco consumption, encourage smokers to quit, and discourage non-smokers from starting to smoke.
- Warnings are effective only if they contain multiple, strong and direct messages that are prominently displayed.
- Health warning message labelling on the product package is a critical component of a comprehensive tobacco control strategy. Health warning message labels are a cost-effective way to inform the public, especially smokers, of the hazards of tobacco use.