

## Amplifying warnings . . . blocking deception Guidelines on tobacco packaging and labelling a top priority

Warnings on tobacco product packs have the power to increase awareness of the health effects of tobacco use and to reduce tobacco consumption. The bigger the warnings are, the better they work. And when pictures and words are used together, the warnings have greater impact.

This simple-sounding wisdom is the result of careful evaluation of various compulsory warning requirements implemented by governments in a range of countries. (See research references at end of media brief)

Article 11 of The Framework Convention on Tobacco Control (FCTC) requires governments of all countries that have ratified the treaty to adopt and implement effective measures to ensure that:

- Every packet or package containing tobacco products carries a health warning describing the harmful effects of tobacco use. These warnings should have official government approval. They should be large, clear and visible, preferably covering at least 50% of the principal display areas (but must cover no less than 30%). And they may include pictures.
- There is no "false, misleading or deceptive" packaging or labelling of tobacco products. Terms such as "low tar", "light", "ultra-light" or "mild" are considered examples of such misleading information.
- Every packet or package of tobacco products displays information on relevant constituents and emissions of the products, in addition to the main health warning.

## A mixed bag of results

Explicit though Article 11 may seem, experience has shown that there has been mixed progress in putting its provisions into effect.

On the positive side:

- At least 25 countries have finalised requirements that tobacco packs must carry picture warnings. Many other countries are in the process of introducing these requirements.
- The size of warnings is increasing, with a growing number of countries requiring warnings even larger than the 50% of front and back display areas recommended in the FCTC.
- At least 43 countries have specifically banned the descriptors "light" and "mild" for cigarettes.
- Countries have found accurate, effective and simple ways of providing additional information on the content and emissions of tobacco products.



But the urgency of adopting clear guidelines to direct and expedite implementation of Article 11 is underscored by the fact that:

- A number of countries that have ratified the FCTC have still not effectively implemented Article 11.
- The tobacco industry is finding ways around the ban on misleading descriptors specified in the text of Article 11 such as "light" or "mild" by adopting alternative descriptors ("smooth" and "fine") or by devices such as colour coding or incorporating ISO tar yield numbers into the brand (Kent Blue 8 or Kent Silver No 4). The WHO Scientific Advisory Committee on Tobacco Product Regulation has concluded that the ISO tar and nicotine ratings are misleading.

## Guidelines are ready for debate

Much-needed guidelines for implementation of Article 11will be considered by the 3<sup>rd</sup> Conference of the Parties to the FCTC.

The draft guidelines to be discussed provide specific guidance on how regulations on package warnings can ensure that they have the strongest possible impact. They provide countries with guidance on how to prescribe the location of messages, the size of messages, the use of pictures, the use of colour and the rotation of messages for optimal effect.

They also provide direction on the content of messages, suggesting particular themes, and noting that "the tone should be authoritative and informative but non-judgemental" and that simple, clear, concise and culturally appropriate language should be used.

In most cases the rationale for specific guidelines is given, utilising the evaluative research that has been done in pioneering countries. For example, in recommending the combined use of text warnings and pictures, the guidelines explain that there is evidence that picture warnings are:

- More likely to be noticed.
- Rated as more effective by tobacco users.
- More likely to remain salient over time.
- Better able to communicate the health risks of tobacco use.
- More thought-provoking, in terms of tobacco use and cessation.
- More likely to increase motivation and intent to guit.
- Associated with more attempts to guit.

Other matters on which the guidelines provide direction are:

 Advising how information on constituents and emissions of tobacco products can be made meaningful to the public by governments requiring

- "qualitative statements," such as: "Smoke from these cigarettes contains benzene, a known cancer-causing substance."
- Explaining how pre-marketing testing of messages can be done inexpensively and can prevent the publication of messages that have counter-productive results.
- Recommending measures for the enforcement of labelling and packaging provisions, including the empowerment of authorities to recall non-compliant tobacco products and publicise the names of offenders.
- Recommending the imposition of penalties that are severe enough to deter non-compliance and that increase with repeat violations.

The Framework Convention Alliance (FCA) believes that the adoption of guidelines on packaging and labelling is a top priority for promoting FCTC implementation and that the 3<sup>rd</sup> Conference of the Parties should adopt the draft guidelines in full and without change.

## Some research on impact of tobacco warnings

See generally: D Hammond, GT Fong, R Borland, KM Cummings, A McNeill, and P Driezen, "Text and Graphic Warnings on

Cigarette Packages: Findings from the International Tobacco Control Four Country Study" (2007) American Journal of

Preventive Medicine 32(3): 210-217; D Hammond, GT Fong, PW McDonald, R Cameron, and KS Brown, "Impact of the Graphic

Canadian Warning Labels on Adult Smoking Behaviour", (2003) *Tobacco Control* 12(4): 391-395; D Hammond, GT Fong, PW

McDonald, S Brown, and R Cameron, "Graphic Canadian Cigarette Warning Labels and Adverse Outcomes: Evidence from

Canadian Smokers" (2004) American Journal of Public Health 94(8): 1442-1445; Environics Research Group Ltd, "Evaluation of

New Warnings on Cigarette Packages" (prepared for the Canadian Cancer Society, 2001), available online at: <a href="http://www.cancer.ca/ccs/internet/standard/0,3182,3172\_334419\_436437\_langId-en,00.html">http://www.cancer.ca/ccs/internet/standard/0,3182,3172\_334419\_436437\_langId-en,00.html</a>; Canadian Cancer Society.

"Controlling the Tobacco Epidemic: Selected Evidence in Support of Banning All Tobacco Advertising and Promotion, and

Requiring Large, Picture-Based Health Warnings on Tobacco Packages" (Ottawa: Canadian Cancer Society, International Union

Against Cancer, 2001), available online at: <a href="http://www.globalink.org/tobacco/docs/packaging/">http://www.globalink.org/tobacco/docs/packaging/</a>; and studies prepared for the

Canadian Department of Health (available online at: <a href="http://www.hc-sc.gc.ca/hecs-sesc/tobacco/research/archive/index.html">http://www.hc-sc.gc.ca/hecs-sesc/tobacco/research/archive/index.html</a>),

the Australian Health Department (available online at:

<a href="http://www.health.gov.au/pubhlth/strateg/drugs/tobacco/warnings.htm">http://www.health.gov.au/pubhlth/strateg/drugs/tobacco/warnings.htm</a>),

and the New Zealand Health Department (available online at:

 $<\!\!\!\text{http://www.ndp.govt.nz/tobacco/smokefree environments/review of regulations.html}\!\!>\!\!).$ 

For more information see: www.fctc.org

The FCA is an international alliance of more than 350 non-governmental organisations committed to global tobacco control