



TPackSS: Tobacco Pack Surveillance System Cigarette Health Warning Label Compliance



India - 2013

In October 2013, India's health warning labels (HWLs) – which fulfill the Framework Convention on Tobacco Control (FCTC) Article 11 minimum requirements – included the following:

1. 40 percent coverage of the front of the pack, with color pictorial HWLs
2. Text warning displayed on contrasting background color
3. Three different tobacco use health warning messages, in English and regional language



Front of pack

India's HWL size ranked 6th in the WHO South-East Asia Region and 123rd globally in 2012.¹ However, FCTC guidelines recommend the use of pictorial warnings that cover 50 percent or more of the front and back of the pack, which India's HWLs did not fulfill.

TPackSS assesses health warning label compliance as HWL requirements improve in countries. In October 2013, TPackSS collected cigarette packs in Mumbai, New Delhi, and Chennai using a systematic protocol.² Cigarette packs were assessed for compliance with the current HWL policy in place at the time of data collection.³

Article 11 of the World Health Organization's (WHO) FCTC requires that Parties implement effective tobacco packaging and labeling measures to increase public awareness of the negative health impacts of tobacco products.

TPackSS systematically collected a sample of 75 unique cigarette packs that displayed the HWLs mandated by India. Packs were assessed for compliance with three key requirements.³

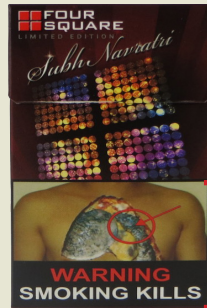
Warning Location

100 percent of packs had a pictorial warning on the front of the pack.



Warning Size

80 percent of packs had a pictorial warning that covered at least 40 percent of the front of the pack.



Warning Label Elements

100 percent of packs had "Warning" in red text and "Smoking Kills" in white text on a black background.



80%

of the unique cigarette packs assessed were compliant with the three key HWL requirements.

Area of Concern: Quality of Printed Health Warning Label

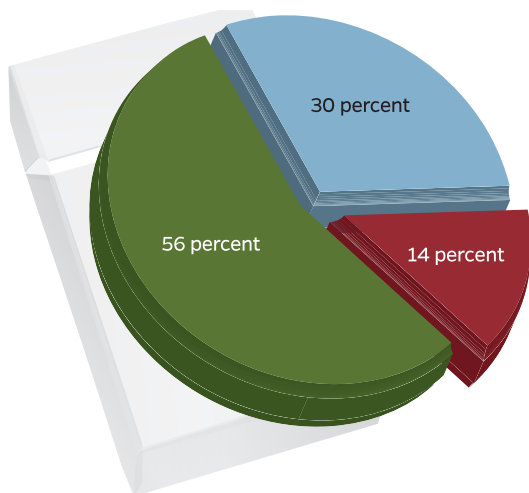
These packs are compliant with the three key HWL requirements. However, a comparison of the packs reveals clear differences in printing color and clarity. The Indian Ministry of Health and Family Welfare⁴ provides reference images for exact color, intensity and clarity for HWLs, but the packs displayed show a wide variation in color and sharpness, which can influence the overall impact of the HWL.



Reference Image



Collected packs with varying HWL colors



Breakdown of packs collected and presence of required HWLs

Total number of unique packs collected: 135

- **56 percent** of total packs had a current mandated HWL (n=75)
- **30 percent** of total packs had no HWL or a non-Indian HWL (n=41)
- **14 percent** of total packs had a previous Indian HWL (n=19)

Three in ten of all packs collected in India displayed a non-Indian HWL or no HWL. India should take action to reduce the sale of packs that do not bear the mandated Indian HWL. At a minimum, India's health warning label policy should require HWL coverage of at least 50 percent on the front and back of the pack. Exposure to best practice HWLs can improve the effectiveness of HWLs in India.

¹ Canadian Cancer Society. Cigarette Package Health Warnings: International Status Report, Third Edition. European Network for Smoking and Tobacco Prevention; 2012. http://www.ensp.org/sites/default/files/CCS_status_report_health_warnings_2012.pdf. Accessed May 25, 2016.

² Smith K, Washington C, Brown J, Vadhais A, Kroart L, Ferguson J, Cohen J. The Tobacco Pack Surveillance System: A Protocol for Assessing Health Warning Compliance, Design Features, and Appeals of Tobacco Packs Sold in Low- and Middle-Income Countries. *JMIR Public Health Surveill.* 2015;1(2). doi: 10.2196/publichealth.4616.

³ Notification G.S.R. 724(E), September 27, 2012, Republic of India; Cigarettes and Other Tobacco Products (Prohibition of Advertisement and Regulation of Trade and Commerce, Production, Supply and Distribution) Act, 2003, Republic of India.

⁴ Ministry of Health and Family Welfare. New Pictorial Warnings [G.S.R.724 (E)]. Ministry of Health and Family Welfare. <http://mohfw.nic.in/index1.php?lang=1&level=0&linkid=211&lid=1300>. Published September 27, 2012. Accessed February 4, 2016.

About TPackSS

The Institute for Global Tobacco Control (IGTC) at the Johns Hopkins Bloomberg School of Public Health developed the Tobacco Pack Surveillance System (TPackSS) project to monitor whether required health warnings on tobacco packages are being implemented as intended, and to identify pack features and marketing appeals that might violate or detract from country tobacco packaging laws in these countries.