



TPackSS: Tobacco Pack Surveillance System Cigarette Health Warning Label Compliance



Indonesia - 2015

As of November 2015, Indonesia's health warning labels (HWLs) – which fulfill the Framework Convention on Tobacco Control (FCTC) Article 11 requirements – included the following:

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



Indonesian HWL size ranked 4th in the WHO South East Asia Region and ranked 79th globally in 2015.¹ However, FCTC guidelines recommend the use of pictorial warnings that cover 50 percent or more of the front and back of the pack, which Indonesia's HWLs do not fulfill.

TPackSS assesses health warning label compliance as HWL requirements improve in countries. In November 2015, TPackSS collected cigarette and kretek packs in Jakarta, Semarang, and Surabaya using a systematic protocol.² Cigarette and kretek 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 207 unique cigarette and kretek packs that displayed the HWLs mandated by Indonesia. Packs were assessed for compliance with four key requirements.³

Warning Location

100 percent of packs had a pictorial health warning positioned on the top of the front and back of the pack.



Warning Size

75 percent of packs had a pictorial health warning that covered 40 percent of the front and back of the pack.



Warning Label Elements

98 percent of packs had white health warning text on a black background.



Warning Text Size

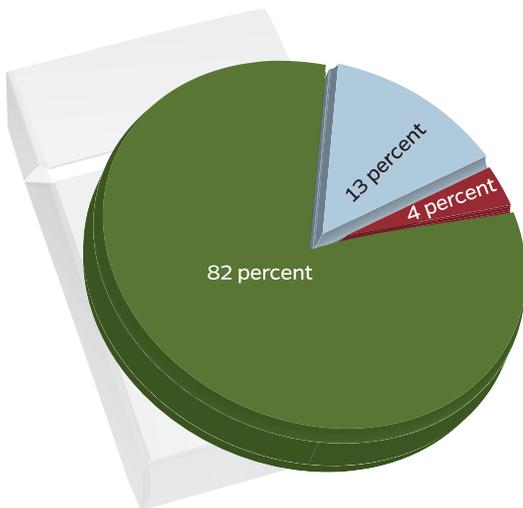
89 percent of packs had health warning text in capital letters and "PERINGATAN" in 10 pt. font.



69% of the unique cigarette and kretek packs assessed were compliant with the four key HWL requirements.

Area of Concern: Misleading Descriptors

Current Indonesian HWL regulations prohibit the use of misleading descriptors such as “mild” and “bold” unless they are part of an established trademark. The packs displayed are noteworthy in that they show examples of tobacco companies taking advantage of the regulation by using misleading descriptors in the brand name or by displaying misspellings. Allowing brand names and packaging text to include any misleading descriptors can create an erroneous impression about the product and its impacts on health.



Breakdown of packs collected and presence of required HWLs

Total number of unique packs collected: 252

- **82 percent** of total packs had a current mandated HWL (n=207)
- **13 percent** of total packs had no HWL or a non-Indonesian HWL (n=34)
- **4 percent** of total packs had a previous text only Indonesian HWL (n=11)

*Percentages do not add up to 100 percent because of rounding.

Approximately two in ten of all packs collected in Indonesia displayed a previous text only Indonesian HWL, no HWL or a non-Indonesian HWL. At a minimum, Indonesia’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 Indonesia.

¹ Canadian Cancer Society. Cigarette Package Health Warnings: International Status Report, Fourth Edition. Campaign for Tobacco Free Kids; 2014. http://global.tobaccofreekids.org/files/pdfs/en/WL_status_report_en.pdf. Accessed May 25, 2016.

² Smith K, Washington C, Brown J, Vadnais 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):e8 DOI: 10.2196/publichealth.4616.

³ Regulation of the Health Minister of the Republic of Indonesia Number 28 of 2013 Concerning Imprinting of Health Warnings and Health Information on Tobacco Product Packaging. April 12, 2013. Republic of Indonesia.

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.