FCA

Framework Convention Alliance
for Tobacco Control

TOBACCO WARNING LABELS

While many tobacco users generally know that tobacco use is harmful, studies show that most are unaware of the true risks, even in countries in which there has been a great deal of publicity about the health hazards of tobacco.[1] As the World Bank noted in 1999, "People's knowledge of the health risks of smoking appears to be partial at best, especially in low- and middle-income countries where information about these hazards is limited."[2] Smokers tend to be even less aware of the risks of tobacco smoke to others.[3] Health warning labels, on cigarette packages as well as all marketing materials, help inform consumers of these dangers and are an important component in a national health education program which costs government nothing.

Implementing the FCTC

Article 11 of the FCTC states that warning messages should cover at least 50% of the principal display areas of the package (i.e. both the front and back), but at a minimum must cover at least 30% of the principal display areas. It also requires that the messages be rotated and encourages the use of pictures and pictograms as well as the use of non-health messages (e.g. "Quit smoking — Save money").

What Makes an Effective Warning Label

To be effective, package warnings must be noticeable, relevant and memorable. They should also address the concerns of smokers and potential smokers alike.[4] Studies have found that:

- To command attention, warning labels should occupy a *minimum* of 50% of the top of the front and back of the package. They should be in color. Type style and size also must be specified to avoid industry efforts to undermine the impact of the warning.

- Messages should convey both the nature and magnitude of the risks, since studies show smokers underestimate most risks associated with tobacco use. Pictorial warnings are also necessary, particularly in countries with low literacy rates or where research shows smokers are ignoring standard warning labels.

- Warning labels need to be rotated periodically to avoid overexposure. Sample text messages include: **CIGARETTES KILL; TOBACCO IS ADDICTIVE; SMOKING CAUSES HEART DISEASE; SMOKING CAUSES 85% OF ALL LUNG CANCER DEATHS; TOBACCO SMOKE CAN HARM THOSE AROUND YOU; QUITTING REDUCES YOUR CHANCE OF HAVING A HEART ATTACK.**

- Warning labels should be applied to all tobacco products, not just cigarettes.[5]

Warning labels are unique among tobacco control initiatives in that they are delivered at the time of smoking. Virtually all smokers are exposed to warning labels, and pack-a-day smokers are potentially exposed to the warnings over 7,000 times per year.[6] Prominent health warnings and messages on tobacco product packages have been found to

lead to an increased awareness of risks and an increased desire to quit,[7] even among smoking youth.[8] An international comparative study has shown that smokers in countries where a warning depicts a particular health hazard of smoking (e.g., impotence) are much more likely to know about that hazard.[9] Tremendous progress is being made worldwide by governments to improve package warnings. The size of warnings is increasing and a growing number of countries require or will soon require picture-based warnings. And, as countries implement the FCTC, revolutionary improvements to package warnings will continue around the world.[10]

A Picture Says a Thousand Words

As the saying goes, "a picture says a thousand words." Pictures can assist smokers to visualize the nature of a tobacco-caused disease or affliction, and convey health messages to populations with low levels of literacy.[11] Five countries have finalized laws requiring picture-based warnings: Canada, Brazil, Singapore, Thailand, and Australia. The European Union, in a 2001 directive on tobacco products, gives member countries the option of adding pictures to mandatory text warnings on tobacco products. Thus, the principle of large, picture-based warnings has been accepted on five continents. Amongst the many arguments for such warnings:

- Such warnings are likely to reach children, particularly the children of smokers, who are the most vulnerable to starting smoking.

- Tobacco product packaging is the ideal tool for communicating with smokers, who are exposed to images printed on packs at least 20 times per day.[12]

Size Matters

Given tobacco's exceptionally hazardous nature and tobacco companies' failure to adequately disclose risks, warnings should occupy at least as much area on tobacco product packaging as any artwork, trademarks or slogans designed to make tobacco products attractive.[13] Canada, Brazil, Australia, Finland, Belgium, Singapore and Thailand all have laws requiring that health messages comprise, on average, at least 50% of the front and back of the package. Countries should implement the largest package warnings possible. The larger the warnings, the better. Countries can and should require that at least 80% of the front and back be reserved for package messages. The front of the pack is more important than the back.

Industry Arguments and Rebuttals:

The tobacco industry has come up with a variety of arguments to undermine warning label regulations. Some common industry arguments include:

- *It is too expensive and technically difficult for us to keep changing the warning labels on tobacco packaging.* This claim is simply not true. Tobacco companies routinely change their packaging for promotions and the rollout of brand extensions. It is no more difficult or expensive to add new warning labels. The tobacco industry made this argument in Canada and Brazil. However after the regulations were finalized, the impossible became possible and the industry printed picture-based warnings on packages.

- *Neither larger warnings nor the use of pictures will be any more effective than the existing warnings.* There is overwhelming evidence that the effectiveness of warnings increases with size, and that picture-based warnings are far more effective than text-only messages.[14] If better warnings would not work, why is the tobacco industry so opposed to them? The industry opposes effective warnings precisely because they know that such warnings will contribute to a decrease in sales and profits.

- *Smokers already know the health effects of smoking.* Studies show that a large proportion of smokers have an inadequate knowledge of the health effects. Many smokers underestimate the health risks. But even those smokers who believe that smoking is associated with health risks may well have an under-appreciation of the severity and magnitude of those risks. Research has shown that an understanding of both risk and severity is necessary to motivate quitting. Picture-based warnings can be effective in conveying the severity of those risks.

- *Mandatory health warnings constitute an expropriation of the tobacco industry's packages and trademarks.* The tobacco industry made the same claim in other countries that have implemented picture-based warnings, but governments rejected these claims. And despite these initial claims, no legal challenges have since been filed claiming that the warnings violate WTO trade agreements respecting intellectual property. Further, implementing provisions in the FCTC (such as minimum size for warnings, or the option to use pictures) does not infringe upon international trade laws.

- *The warnings 'demonize' smokers and make them feel like outcasts.* In fact, the warnings provide smokers with helpful information on the health effects. Most smokers want this information, and certainly want their children to have this information. The tobacco industry is continuing its decades-long strategy of trying to minimize the effectiveness of package warnings. The tobacco industry is no friend of smokers — the tobacco industry kills its best customers.

- *If the government wants to put out those messages, it should use billboards or TV commercials.* The most important and cost-effective communications medium is the package. It has universal reach, and the cost of package warnings is paid for by tobacco companies, not government. Further, the combination of a mass media campaign and enhanced package warnings is more effective than the mass media campaign on its own.

Resources on the Web

"Evaluation of New Warnings on Cigarette Packages," Prepared for the Canadian Cancer Society (2001) *www.cancer.ca/ccs/internet/standard/ 0,3182,3172_334419_436437_langIden,00.html*

Studies prepared for the Canadian Department of Health on various aspects of warning labels: *www.hc-sc.gc.ca/hecs-sesc/tobacco/research/archive/index.html*

"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" (Canadian Cancer Society, 2001) *http://www.globalink.org/tobacco/docs/packaging/evidence.doc*

Sample Warning Labels from Select Countries: *htp://fctc.org/links/packaging.shtml*

Endnotes

1. R. Nathan. *Model Legislation for Tobacco Control: A Policy Development and Legislative Drafting Manual*. (Paris: International Union for Health Promotion and Education, 2004).

2. World Bank. *Curbing the Epidemic: Governments and the Economics of Tobacco Control* (Washington, D.C.: World Bank, 1999).

3. R. Nathan, op. cit.

4. Health Canada. "Regulatory Impact Analysis Statement." *Canada Gazette* Part II, Vol. 134, No. 15, (July 2000).

5. R. Borland. "Tobacco Health Warnings and Smoking-Related Cognitions and Behaviours." *Addiction*, Vol. 92, (1997); International Union Against Cancer Tobacco Control Fact Sheet No. 2. "Health Warnings/Messages on Tobacco Products." (1996) <www.globalink.org/tobacco/fact_sheets/02fact.htm>

6. D. Hammond, G T. Fong, et al. "Impact of the graphic Canadian warning labels on adult smoking behaviour." *Tobacco Control*. Vol. 12, No. 4 (December 2003), p. 391-395.

7. R. Nathan, op. cit.

8. G.T. Fong, et al. "Effects of the Canadian Graphic Warning labels Among High School Students: A Quasi-Experimental Longitudinal Survey." (Paper presented at the *National Conference on Tobacco or Health*, San Francisco, November 2002).

9. D. Hammond, et al. "The effects of warning labels on knowledge about the health risks of smoking: Findings from the International Tobacco Control Policy Evaluation Survey." (Paper presented at the meeting of the *Society for Research on Nicotine and Tobacco*, Prague, Czech Republic, March 2005).

10. E.J. Strahan, et al. "Enhancing the Effectiveness of Tobacco Package Warning Labels: A Social Psychological Perspective." *Tobacco Control*. Vol. 11, No. 3 (September 2002), p.183-190.

11. Canadian Cancer Society. *Confronting the Tobacco Epidemic: Recommendations for Regulations Under the Tobacco Act.* (March 1998).

12. Les Etudes de marche Createc, *Effectiveness of Health Warning Messages on Cigarette Packages in Informing Less Literate Smokers: Final Report*. (Ottawa: Communication Canada, 2003).

13. Framework Convention Alliance. *Packaging & Labeling: Recommended Text*. (Briefing Paper for INB-3, 2001).

14. G.T. Fong, et al. *Quasi-experimental evaluation of the enhancement of warning labels in the United Kingdom: Findings from the International Tobacco Control Policy Evaluation Survey*. (Paper presented at the International Congress of Behavioral Medicine, Mainz, Germany, August 2004).