

Two strands, one strategy: End tobacco displays, introduce plain packaging

January 2011

Who we are

The Smokefree Action Coalition is an organisation of over 160 health and welfare organisations including the BMA, royal medical colleges such as the Royal College of Physicians, the Royal College of General Practitioners and the Royal College of Paediatrics and Child Health, and charities such as the British Heart Foundation and Cancer Research UK, committed to reducing the burden of harm caused by tobacco products.

What we are calling for

Since 2007 we have been campaigning for a comprehensive tobacco strategy that would put an end to tobacco displays and require tobacco products to be sold in plain packaging.

Why we support these policies

Tobacco kills 100,000 people a year in the UK and approximately **340,000 under-16s** try cigarettes for the first time each year¹ and it is estimated that eight out of ten smokers start before the age of 19.²

A large and growing evidence base shows that tobacco display and packaging are major drivers of youth smoking. In the words of Health Secretary Andrew Lansley “*It’s wrong that children are being attracted to smoke by glitzy designs on packets.*” Pack displays also undermine adult smokers trying to quit, triggering relapse.^{3 4}

Ending tobacco displays and plain packaging are essential to the Government’s policy of changing the environment to improve health

The Smokefree Action Coalition welcomes the Government’s commitment in the Public Health White Paper *Healthy Lives Healthy People*, that “*Reducing smoking will continue to be a focus for public health. We will work to create environments that further discourage smoking and help bring about cultural change to make it less attractive.*”

To quote Richard Thaler, who advises the Government on behaviour change from his book *Nudge*, “*It is legitimate for choice architects to try to influence people’s behaviour in order to make their lives longer, healthier and better.*”⁵

We particularly welcome the Secretary of State for Health’s announcement that the Government will consider introducing plain packaging of tobacco products. We are concerned, however, that this may be considered as an alternative rather than as well as the removal of tobacco product displays.

This briefing contains:

- a. The case for removing tobacco point of sale displays
- b. The case for cigarettes being in plain packaging
- c. Why both policies should be implemented

(a) THE CASE FOR REMOVING TOBACCO POINT OF SALE DISPLAYS

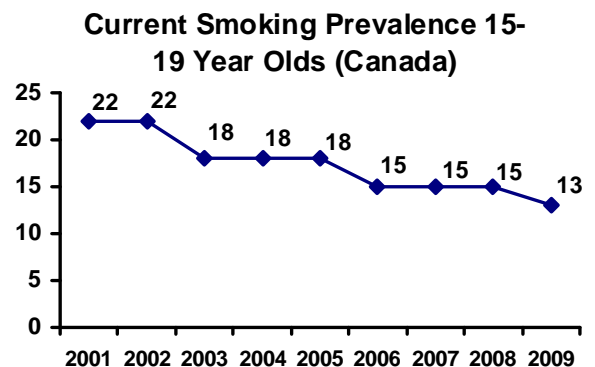
Children are protected from tobacco marketing

The advertising ban has reduced overall awareness of tobacco promotion and brands among the young making shop displays the most important source of tobacco marketing.

- As recognised in the Cabinet Office's recently published 'Applying behavioural insight to health', "*If we know anything from behavioural science, it is that behaviour is strongly influenced by what we think others are up to.*"⁶
- Removing tobacco displays uses precisely this effect: in Ireland, fewer young people now believe smoking is widespread among their peers. Before removal, 62 per cent thought that more than one in five children their own age smoked. This fell to 46 per cent afterwards.⁷

When other risk factors are controlled for, young non-smokers' susceptibility to start smoking increases with greater awareness of brands and tobacco marketing at point of sale.

- Research with 25,000 young people in New Zealand, where advertising is also banned, found that those 15 year olds most exposed to shop displays are almost three times more likely to try smoking, and exposure to shop displays is a greater risk factor than even parental smoking.⁸
- A recent systematic review of international research has confirmed previous findings with seven out of eight studies showing a link between exposure to shop displays and youth smoking.⁹
- Tobacco industry lobbyists have suggested that similar legislation in Canada is associated with an increase in youth smoking. In fact, official data show youth smoking in Canada has fallen steadily.^{10 11}



Retailers are able to adapt

The policy of removing tobacco displays aims to reduce take-up of cigarettes so that shops have time to adapt as they have done despite the long-term decline in smoking rates from 45% of the population in 1974 to 21% of the population today.¹² Ireland recently successfully removed displays of tobacco. Their experience was that:

- The UK Association of Convenience Stores found the average cost of compliance in Ireland was **£300** for those retailers who had to pay, but the industry paid for many to convert.¹³
- Peer reviewed economic research¹⁴ from the Republic of Ireland, using data from AC Nielsen, shows no impact on retailers from removing PoS displays. It will help reduce smoking rates over the long-term, giving retailers time to adapt.
- A report on the Irish experience in the trade magazine *The Grocer* found that "*the outlook may not be as gloomy as feared – at least not for retailers.*"¹⁵

(b) THE CASE FOR PLAIN PACKAGING OF TOBACCO PRODUCTS

A new approach, with a growing evidence base: Peer reviewed studies have found that compared to current branding, plain packaging for tobacco products reduces false beliefs about the relative harm of tobacco products, is less attractive, especially to young people, improves the effectiveness of health warnings and reduces pressure to smoke.

Less misleading: Adults and young people (11-17 year olds) are significantly more likely to rate 'silver' and 'gold' packs as lower tar, lower health risk and either easier to quit smoking (adults) or their choice of pack if trying smoking (youth). Plain packs significantly reduce false beliefs about health risk and ease of quitting, and young people rate them as significantly less attractive and appealing for trying smoking.^{16 17 18}

Less attractive, especially to young people: Following the introduction of advertising bans, tobacco manufacturers have increasingly turned to packaging to make their products more attractive. In a study comparing existing branded packs with plain cardboard packs with the name and number of cigarettes in small standard font, plain packs were found to be significantly less attractive.^{19 20 21 22}

Improves the effectiveness of health warnings: Reducing the extent of branding on cigarette packaging progressively increases the dissuasive effect of health warnings as does increasing the size of warnings. Of 13 options tested in one study, plain packs with large warnings were significantly more likely to elicit cessation related behaviours.^{23 24 25 26}

Tested in real life settings. Recent research, in which young adults were asked to use plain packs and were questioned about their feelings towards them, confirm findings that standardised packaging increased negative perceptions and feelings about the pack and about smoking. It also increased avoidant behaviour such as: hiding or covering the pack; smoking less around others; forgoing cigarettes; and increased thinking about quitting. Almost half in the post-study interview reported that plain packs had either increased avoidant behaviour or reduced consumption.²⁷

Reduces pressure to smoke: Large-scale research in the UK demonstrates that even after advertising is not allowed, branding continues to drive teen smoking. Awareness of packaging and new pack design are key elements of industry marketing.^{28 29 30}

(c) WHY BOTH POLICIES SHOULD BE IMPLEMENTED

Legislation to remove displays of tobacco products at the point of sale has been passed by parliament and is due to start in October 2011 in large shops and in October 2013 for small retailers. If it is successful, legislation for plain packaging of tobacco products is unlikely to come into force before 2015.

- Every year 340,000 children under sixteen try cigarettes for the first time.³¹ Smoking is so harmful that it is entirely appropriate that government should protect children both by putting tobacco out of sight in shops **and** requiring plain packaging.
- In Australia, the only country so far to commit to mandating plain packaging, it is being introduced in addition to, and not instead of, display removal.³² It is seen as a natural progression not an alternative to display removal.
- Display removal are also a recommendation in the guidelines to Article 13 of the WHO Framework Convention on Tobacco Control (to which the UK is a Party), with Parties urged to consider, in addition, adopting plain packaging.³³

These measures, taken together, will achieve the public health objectives of reducing young people's uptake of smoking and helping those trying to quit.

The tobacco industry will mount very strong opposition to plain packaging

The tobacco industry will not get rid of tobacco displays just because tobacco has to be put in plain packs because even displays of plain packs will continue to reinforce the social norm that smoking is mainstream and acceptable.

Plain packaging will face no less opposition from manufacturers and retailers than has the point of sale display removal. The tobacco industry says: "We're going to take whatever action we can."³⁴

- As an adviser to the Australian tobacco industry campaign against plain packaging said: *"Be forthright - at times even aggressive - in nature (if the campaign fails, you won't have any brands left anyway, so there is no point worrying too much about damage to your brand)."*³⁵
- In Australia, small shop keepers have been used as a front for the tobacco manufacturers' campaign against plain packaging just as they have been in the UK in their campaign to defend displays.³⁶
- Indeed, the same core arguments have been used in both cases, claiming that tobacco smuggling will increase, reducing legitimate sales and resulting in businesses closing. In the case of point of sale displays, international evidence demonstrates these claims to be false and they lack clear logic when applied to plain packaging.

A recent survey by YouGov for Cancer Research UK found that 73% of the UK backed proposals to protect children from tobacco by putting it out of sight in shops.³⁷ Should the Government fail to implement legislation on tobacco displays, it risks appearing to have caved in to the tobacco industry and so encouraging the industry to use the same tactics in opposition to plain packaging.

For more information contact

Martin Dockrell, Director of Policy & Research, Action on Smoking & Health
martin.dockrell@ash.org.uk 0207 7339 5902

The Smokefree Action Coalition is an organisation of over 160 health and welfare organisations committed to reducing the burden of harm caused by tobacco products.



-
- ¹ Impact Assessment of prohibiting the display of tobacco at point of sale, for the Health Bill, Department of Health, January 2009.
- ² Goddard E. (2008). General Household Survey 2006: Smoking and drinking among adults 2006. Office for National Statistics, Newport.
- ³ Department of Health Press Release November 19, 2010
- ⁴ Point of sale display of tobacco products. The Centre for Tobacco Control Research. August 2008.
http://www.ctcr.stir.ac.uk/pdf_docs/Tobacco%20pos%20report_final.pdf
- ⁵ Nudge: Improving Decisions About Health, Wealth, and Happiness - by Richard Thaler and Cass Sunstein New Haven, Yale University Press 2008 http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsLegislation/DH_093305. p.17.
- ⁶ Applying behavioural insight to health, Cabinet Office, December 2010.
- ⁷ McNeill, A. et al. (2010) Evaluation of the removal of point of sale tobacco promotional displays in Ireland. Tobacco Control doi:10.1136/tc.2010.038141
http://tobaccocontrol.bmj.com/content/early/2010/11/18/tc.2010.038141.short?q=w_tobaccocontrol_ahead_tab
- ⁸ Paynter J, et al. Point of sale tobacco displays and smoking amongst 14-15 year olds in New Zealand: cross sectional study Tobacco Control Journal. *Submitted*. Presented March 2009 at the World Conference on Tobacco or Health.
- ⁹ Paynter J, Edwards R. The impact of tobacco promotion at the point of sale: A systematic review *Nic Tob Res*, 11:1: 25-35. 2009.
- ¹⁰ Tobacco Manufacturers Association <http://www.the-tma.org.uk/policy-legislation/display-ban/>
- ¹¹ Canadian Tobacco Use Monitoring Survey http://www.hc-sc.gc.ca/hc-ps/tobac-tabac/research-recherche/stat/ctums-esutc_2009-eng.php
- ¹² General Household Survey: Smoking and drinking among adults 2007, Office for National Statistics. 2008.
http://www.statistics.gov.uk/downloads/theme_compedia/GHS07/GHSSmokingandDrinkingAmongAdults2007.pdf
- ¹³ Implementation of the Tobacco Display Ban in Republic of Ireland. ACS 2009.
- ¹⁴ Quinn C, Lewis S, Edwards R, McNeill A. (2010) Economic evaluation of the removal of point of sale tobacco promotional displays in Ireland. Tobacco Control doi:10.1136/tc.2010.039602
- ¹⁵ The Grocer, 8 August 2009 p.36
- ¹⁶ Hammond D, Dockrell M, Arnott D, Lee A, McNeill A. Cigarette pack design and perceptions of risk among UK adults and youth *Eur J Public Health*. 2009 Dec;19(6):631-7.
- ¹⁷ Hammond D, Parkinson C. The impact of cigarette package design on perceptions of risk *J Public Health (Oxf)*. 2009 Sep;31(3):345-53
- ¹⁸ Hastings G, Galopel-Morvan K, Rey JM. The plain truth about tobacco packaging *Tob Control* 2008;17:361-362
- ¹⁹ Good G, Global Brand Director, Imperial Tobacco UBS Tobacco Conference December 1, 2006 London
- ²⁰ Wakefield MA, Letcher T. My pack is cuter than your pack *Tob Control* 2002 11: 154-156
- ²¹ Wakefield MA, Germain D, Durkin SJ. How does increasingly plainer cigarette packaging influence adult smokers' perceptions about brand image? An experimental study. *Tob Control*. 2008 Dec;17(6):416-21
- ²² Rootman I, Flay BR. A study on youth smoking: plain packaging, health warnings, event marketing and price reductions. Toronto, Ontario, Canada: University of Toronto, University of Illinois at Chicago, York University, Ontario Tobacco Research Unit, Addiction Research Foundation, 1995.
- ²³ Hoek J, Wong C, Glendall P, et al Effects of dissuasive packaging on young adult smokers *Tob Control* published online October 21, 2010 doi: 10.1136/tc.2010.037861
- ²⁴ Cunningham R, Kyle K. The case for plain packaging. *Tob Control* 1995;4:80-6.
- ²⁵ Goldberg ME, Liefeld J, Madill J, et al. The effect of plain packaging on response to health warnings. *Am J Public Health* 1999;89:1434-5
- ²⁶ Beede P, Lawson R. The effect of plain packages on the perception of cigarette health warnings. *Public Health* 1992;106: 315-22.
- ²⁷ Moodie C (2010). Young adult smokers' perceptions of plain packaging: a pilot ecological study. *Submitted*
- ²⁸ Moodie C, Mackintosh AM, Brown A, et al. Tobacco marketing awareness on youth smoking susceptibility and perceived prevalence before and after an advertising ban. *Eur J Public Health* 2008;18:484-90.
- ²⁹ Centre for Tobacco Control Research (CTCR). Point of sale display of tobacco products. London, UK: Cancer Research UK, 2008
- ³⁰ Moodie C, Hastings G. Tobacco packaging as promotion *Tob Control* 2010;19:168-170
- ³¹ Impact Assessments for the Health Bill. Department of Health, January 2009
http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsLegislation/DH_093305
- ³² Taking Preventative Action – A Response to Australia: The Healthiest Country by 2020 – The Report of the National Preventative Health Taskforce. Australia May 2010.
- ³³ Guidelines for implementation of Article 13 of the WHO Framework Convention on Tobacco Control (Tobacco advertising, promotion and sponsorship) http://www.who.int/fctc/guidelines/article_13.pdf
- ³⁴ Peacock, L., 2010. BAT considers legal action on packaging. *The Daily Telegraph*. 22 November 2010. See: <http://www.telegraph.co.uk/health/healthnews/8149573/Cigarettes-may-be-sold-in-plain-brown-packs-so-they-are-less-attractive-to-children.html>
- ³⁵ Lateline, 2010. [TV programme] ABC, 10 September 2010. See: <http://www.abc.net.au/lateline/content/2010/s3008987.htm>
- ³⁶ "Big Tobacco slammed over ads", Australian Broadcasting Corporation Broadcast: 11/08/2010
<http://www.abc.net.au/lateline/content/2010/s2980489.htm>
- ³⁷ <http://www.ukcolumn.org/sites/default/files/files/YouGov%20survey%20CRUK.pdf>