



Policy statement

Tobacco marketing

Introduction

Tobacco advertising is a major factor in encouraging young people starting to smoke. Since February 2003, virtually all forms of tobacco advertising and promotion have been banned in the UK under the Tobacco Advertising and Promotion Act.

From 2005, cross-border sponsorship by tobacco brands has been banned across the European Union. A total ban on advertising and sponsorship is a core measure advocated within the Framework Convention on Tobacco Control (FCTC), the global treaty that aims to reduce tobacco consumption and smoking-related harm, to which the UK is a signatory.

Policy statement

The BHF wants to see all forms of marketing of tobacco and tobacco paraphernalia prohibited.

Introducing plain packaging would reduce the attractiveness and appeal of tobacco products, particularly for young people, increase the prominence and effectiveness of health warnings, and reduce the ability of packaging to mislead smokers about the harms of smoking.

The UK Government should at the earliest opportunity:

- introduce a tobacco plain packaging bill into Parliament, and
- seek amendments to the EU Tobacco Products Directive, to enable large front-of-pack picture health warnings.

Plain packaging must be brought in as a complementary measure to the removal of point of sale tobacco displays, and not as an alternative. Both will help to reduce smoking prevalence among young people over the long-term.

Advertising **tobacco accessories** such as cigarette papers and filters, currently exempt from current legislation on tobacco advertising, should also be prohibited.

Background

Since the implementation of the Tobacco Advertising and Promotion Act 2002 the tobacco industry has invested resources in package design and point of sale displays, which are the only permitted forms of advertising.

For example, Imperial Tobacco has stated that because of advertising restrictions, cigarette packs and their display in retail outlets are now a major marketing tool and that pack redesign alone has increased their share of the market.¹

The Coalition Government committed in 2011 to implement the legislation passed in the Health Act 2009 prohibiting tobacco advertising at the point of sale in England.⁷ This will come into force for large retailers from April 2012 and all other shops from April 2015 in both England and Scotland, with Wales and Northern Ireland expected to follow suit.

Exemptions to the original advertising ban remain, notably with regards to tobacco packaging and accessories.

Plain packaging

As government efforts to restrict the promotion of tobacco have cut off traditional ‘above the line’ advertising such as TV and billboards, ‘below the line’ marketing has become increasingly relied on by the tobacco industry. This has included point of sale displays and package design. Package design is part of the branding and marketing process and tobacco companies have used this as a marketing tool to make products more alluring. Despite the health warnings, tobacco packaging is the ‘communication life-blood’ of the tobacco industry and ‘the silent salesman that reaches out to customers.’²

Plain packaging refers to packaging that has had the promotional aspects removed, meaning that the appearance of all tobacco packs is standardised. It can also be known as generic, standardised or homogenous packaging. Except for the brand name (which would be written in a standard typeface) all other trademarks, logos, colour schemes and graphics would be prohibited. The package itself would be plain coloured and display the product content and consumer information as well as the health warnings required by law.

Packaging as advertising

Polling commissioned by the British Heart Foundation in 2011 indicates that 69 per cent of 16-25 year olds consider tobacco packaging to be a form of advertising, with less than ten per cent actively disagreeing.³ Packaging is a key way for the industry to express their brands, and in a short BHF video young people highlighted how differences in packaging convey different values of brands.⁴ The other restrictions now in place on advertising mean packaging is considered even more important by the tobacco industry.^{5,6} Internal tobacco

¹ Transcript from a speech by Geoff Good, Global Brand Director, Imperial Tobacco Group PLC. UBS Tobacco Conference, 1 December 2006, London. Available at: http://www.imperial-tobacco.com/files/financial/presentation/011206/ubs_transcript.pdf

² Underwood RL, Ozanne J. Is your package an effective communicator? A normative framework for increasing the communicative competence of packaging. *J Market Commun* 1998; 4: 207-20. Available at: http://www.marketing.pamplin.vt.edu/facultyFolder/julieOzanne/01socialwebsite/professional/researchpapers/1998_JMC_Packaging.pdf

³ *The plain truth: how tobacco plain packaging will save lives*. London: British Heart Foundation; 2011. Available at: <http://www.bhf.org.uk/publications/view-publication.aspx?ps=1001776>

⁴ <http://www.youtube.com/watch?v=B-sE5RodJaU>

⁵ Philip Morris Limited. Marketing new products in a restrictive environment. Philip Morris international meeting, Naples, Florida, June 1990. Bates No: 2044762173-2364. Available at: <http://legacy.library.ucsf.edu/tid/yhs55e00/pdf>

⁶ Horan JK, Steger C, Leavell NR. Marketing to America's youth: evidence from corporate documents. *Tob Control* 2002; Mar;11 Suppl 1:15-17. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/11893810>

industry documents confirm that they have invested heavily in package design to communicate to specific demographics, including young people.^{7,8}

Brands help to give a product a personality, with people associating a brand with a particular image. A brand can convey particular characteristics such as style or social status. Tobacco packaging helps to project that particular image, and reinforce those characteristics.^{13,9}

Reducing tobacco's appeal

There are still around 200,000 children and young people in England that each year start smoking, and while this has been declining it has slowed in recent years.¹⁰

Tobacco companies need to find one new smoker for each of the 100,000 people that die or quit every year, and so it is in their interest to make their product as alluring as possible.

In recent years the industry has increasingly targeted young women, particularly through new 'super-slim' branding and packaging, with two new 'designer' packs launched in 2011 alone. An industry spokesperson commented that their company's marketing is not aimed at encouraging anybody to start smoking, but is simply trying to encourage existing smokers to switch to their brands.¹¹ But for a profit-making industry, new customers are essential. Internal industry documents do not shy away from this fact, acknowledging the need to attract new smokers.^{17,12,13,14,15,16} The tobacco industry as a result invests significant resources to innovate the branding on its packaging to attract more people to buy the product.

Experimental studies where example plain packs have been used alongside existing brands have shown that plain packaging can help to reduce the appeal of the product. One study looking at adult smokers in Australia found that cigarette packs that displayed progressively fewer branding design elements were perceived increasingly unfavourably by smokers.¹⁷ The same research team also found that progressively removing brand elements such as colour, branded fonts and imagery resulted in



⁷ Wakefield M, Morley C, Horan J, Cummings K. The cigarette pack as image: new evidence from tobacco industry documents. *Tob Control* 2002; Mar;11 Suppl 1:173-80. Available at: <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1766062/>

⁸ Cummings KM, Morley CP, Horan JK, Steger C, Leavell NR. Marketing to America's youth: evidence from corporate documents. *Tob Control* 2002; Mar;11 Suppl 1:15-17.. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/11893810>

⁹ Barbeau EM, Leavy-Sperounis A, Balbach ED. Smoking, social class, and gender: what can public health learn from the tobacco industry about disparities in smoking? *Tob Control* 2004; Jun;13(2):115-20. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/15175523>

¹⁰ Robinson S, Harris H. *Smoking and drinking among adults 2009: a report on the 2009 General Lifestyle Survey*. London: Office for National Statistics; 2011. Available at: <http://www.ons.gov.uk/ons/rel/ghs/general-lifestyle-survey/2009-report/smoking-and-drinking-among-adults--2009.pdf>

¹¹ Nelson B. Campaigners fume at new designer cigarette. *Northern Echo*. Tuesday May 31 2011:

http://www.thenorthernecho.co.uk/news/9056083.Campaigners_fume_at_new_designer_cigarette/

¹² Chaloupka FJ, Cummings KM, Morley CP, Horan JK. Tax, price and cigarette smoking: evidence from the tobacco documents and implications for tobacco company marketing strategies. *Tob Control* 2002; Mar;11 Suppl 1:162-72. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/11893816>

¹³ Carter SM. From legitimate consumers to public relations pawns: the tobacco industry and young Australians. *Tob Control* 2003; Dec;12 Suppl 3:iii71-8. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/14645951>

¹⁴ Krugman D, Quinn W, Sung Y, Morrison M. Understanding the role of cigarette promotion and youth smoking in a changing marketing environment. *J Health Commun* 2005; Apr-May;10(3):261-78. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/16036733>

¹⁵ Perry CL. The tobacco industry and underage youth smoking: tobacco industry documents from the Minnesota litigation. *Arch Pediatr Adolesc Med* 1999; Sep;153(9):935-41. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/10482208>

¹⁶ Pollay RW. Targeting youth and concerned smokers: evidence from Canadian tobacco industry documents. *Tob Control* 2000; Jun;9(2):136-47. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/10841849>

¹⁷ Wakefield M, Germain D, Durkin S. How does increasingly plainer cigarette packaging influence adult smokers' perceptions about brand image? An experimental study. *Tob Control* 2008; Dec;17(6):416-21. Epub 2008 Sep 30. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/18827035>

adolescent smokers perceiving the packs as less appealing, having more negative expectations of cigarette taste and rating attributes of a typical smoker of the pack less favourably.¹⁸ Similar research in Canada looked specifically at female smokers aged 18 to 25 years old, and found that removing descriptors and colours significantly reduced a pack's appeal – plain packs were associated with fewer positive characteristics than fully branded packs, including glamour, being slim, popular, attractive and sophisticated.¹⁹

In the BHF's 2011 polling, 16-25 year olds were asked to compare an Australian-style plain pack with UK picture warnings placed on the front, alongside two existing brands. Over 87 per cent of respondents found the plain packs to be the least attractive, with the reaction stronger among regular smokers with 91 per cent finding plain packs the least attractive.²⁰

Making health warnings more effective

In 2009, the UK was the first nation in the European Union to introduce picture health warnings on all tobacco packaging. This was an important step to help increase awareness on the dangers of tobacco use on their health to smokers and those considering smoking.

Health warnings are effective in conveying the dangers of smoking and helping smokers to quit.^{21,22} A multi-country study showed that the larger and more prominent a health warning, the more likely it was to be remembered.²³ Evidence also suggests that large picture warnings on the front and back surfaces of tobacco packaging increase their effectiveness among young and adult smokers and non-smokers.^{24,25} To further maximise their visibility, these warnings should be placed on the upper part of the packs.

Evidence suggests that brand imagery on tobacco packaging distracts from and reduces the impact of health warnings. Studies have also shown that plain packaging enhances the ability to recall health warnings.^{26,27} The Australian model for plain packaging incorporates front-of-pack picture warnings, blending the most effective health messaging with the significant restrictions on branding.

Respondents to the BHF's 2011 polling were asked to consider what packs would encourage people to smoke less or quit. When presented with the Australian-style plain pack with front-facing UK picture warnings, alongside two existing brands, 77 per cent believed that the plain pack would encourage healthier behaviour. A majority of smokers felt the

¹⁸ Germain D, Wakefield MA, Durkin SJ. Adolescents' perceptions of cigarette brand image: does plain packaging make a difference? *J Adolesc Health* 2010; Apr;46(4):385-92. Epub 2009 Oct 14. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/20307829>

¹⁹ Doxey J, Hammond D. Deadly in pink: the impact of cigarette packaging among young women. *Tob Control* 2011; Sep;20(5):353-60. Epub 2011 Apr 8. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/21478476>

²⁰ *The plain truth: how tobacco plain packaging will save lives*. London: British Heart Foundation; 2011. Available at: <http://www.bhf.org.uk/publications/view-publication.aspx?ps=1001776>

²¹ Borland R, Wilson N, Fong GT, Hammond D, Cummings KM, Yong HH, Hosking W, Hastings G, Thrasher J, McNeill A. Impact of graphic and text warnings on cigarette packs: findings from four countries over five years. *Tob Control* 2009; Oct;18(5):358-64. Epub 2009 Jun 28. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/19561362>

²² Borland R, Yong HH, Wilson N, Fong GT, Hammond D, Cummings KM, Hosking W, McNeill A. How reactions to cigarette packet health warnings influence quitting: findings from the ITC Four-Country survey. *Addiction* 2009; Apr;104(4):669-75. Epub 2009 Feb 10. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/19215595>

²³ Hammond D, Fong GT, Borland R, Cummings KM, McNeill A, Driezen P. Text and graphic warnings on cigarette packages: findings from the international tobacco control four country study. *Am J Prev Med* 2007; Mar;32(3):202-9. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/17296472>

²⁴ Shanahan P, Elliott D. *Evaluation of the Effectiveness of the Graphic Health Warnings on Tobacco Product Packaging 2008*. Australian Government Department of Health and Ageing, Canberra; 2009.

²⁵ Hammond D. Health warning messages on tobacco products: a review. *Tob Control* 2011; Sep;20(5):327-37. Epub 2011 May 23. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/21606180>

²⁶ Beede P, Lawson R. The effect of plain packages on the perception of cigarette health warnings. *Public Health* 1992; Jul;106(4):315-22. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/1529094>

²⁷ Goldberg ME, Liefeld J, Madill J, Vredenburg H. The effect of plain packaging on response to health warnings. *Am J Public Health* 1999; Sep;89(9):1434-5. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/10474569>

same, with 75 per cent of occasional smokers and 67 per cent of regular smokers feeling the plain packs would encourage people to smoke less or quit.²⁸

The UK is able to legislate to introduce plain packaging, however for picture warnings to be introduced on the front of the packs, the EU Tobacco Products Directive must be amended – the Directive is scheduled to be updated by 2014.

Making packaging less misleading

Packaging can be used to appeal to new smokers, but there are also indications that it has been used to reinforce mistaken beliefs that some brands are ‘healthier’ than others. All cigarettes contain the toxins, tar, and carbon monoxide that lead to one out of two regular smokers dying from resulting disease.

There have been efforts in recent years to restrict what can be included on tobacco packaging. The EU Tobacco Product Directive, implemented in 2003, stopped tobacco companies from using text and trademarks to suggest that a particular tobacco product is less harmful than others – words such as ‘light’ or ‘mild’ were no longer able to appear on packaging. However, packaging has adapted to this environment to continue to reinforce some of these misleading messages.

The tobacco industry has continued to use gold and silver packaging on products to associate them as being ‘lighter’ or ‘lower-tar’ products. Research published in 2011 analysed the effects of the removal of misleading ‘light/mild’ terms on cigarette packs in the UK, Australia and Canada. It showed that though there was a drop in the number of people that mistakenly believed cigarettes marketed as ‘light’ or ‘mild’ carried fewer health risks, this effect was temporary, and removing these words alone is insufficient to effectively eliminate false beliefs.²⁹

Research to examine consumer perceptions of brands found that both adult and young people were significantly more likely to rate packages with the term ‘smooth’, ‘gold’ and ‘silver’ as lower tar, lower health risk, and easier to quit compared to regular varieties of the same brands.³⁰ One recent UK study also showed that tobacco packaging misleads young people about the relative harm of products.³¹ This was also reflected in the BHF’s polling, where young people were asked questions on the relative harm of particular cigarette brands. Worryingly, over 15 per cent of all respondents, and over 25 per cent of regular smokers, believed that one brand of cigarette was less harmful than another.³²

The introduction of plain packaging would eliminate the tobacco industry’s ability to mislead consumers about the relative merits of its different products.

Implementing plain packaging

The strength of the tobacco industry’s reaction to the legislation in Australia confirms that this is something that will have a significant impact on its sales.

²⁸ *The plain truth: how tobacco plain packaging will save lives*. London: British Heart Foundation; 2011. Available at: <http://www.bhf.org.uk/publications/view-publication.aspx?ps=1001776>

²⁹ Yong HH, Borland R, Cummings KM, Hammond D, O’Connor RJ, Hastings G, King B. Impact of the removal of misleading terms on cigarette pack on smokers’ beliefs about ‘light/mild’ cigarettes: cross-country comparisons. *Addiction* 2011; Dec;106(12):2204-13. doi: 10.1111/j.1360-0443.2011.03533.x. Epub 2011 Sep 21. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/21658140>

³⁰ Hammond D, Dockrell M, Arnott D, Lee A, Anderson S, McNeill A. The impact of cigarette pack design on perceptions of risk among UK adult and youth. *Eur J Public Health* 2009; Dec;19(6):631-7. Epub 2009 Sep 2. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/19726589>

³¹ Moodie C, Ford A, Mackintosh AM, Hastings G. Young People’s Perceptions of Cigarette Packaging and Plain Packaging: An Online Survey. *Nicotine Tob Res* 2011; Oct 24. [Epub ahead of print] Available at: <http://www.ncbi.nlm.nih.gov/pubmed/22025540>

³² Research by OnePoll commissioned on behalf of the British Heart Foundation, 2771 people in the UK aged 16-25 years polled online in October/November 2011.

The industry has claimed that plain packaging legislation would represent an acquisition of intellectual property, and as such would contravene various international trade agreements. Under plain packaging, intellectual property of tobacco companies would be retained by those companies. Governments would not intend to use the logos, and tobacco companies will retain full rights to both their logos and brand imagery – legislation will simply prevent their use on cigarette packaging.³³

In 2008 Sir Richard Buxton, a former judge on the Court of Appeal of England and Wales, examined the legality of introducing plain packaging in the UK on behalf of ASH. On both the issue of property rights and the free movement of goods in the context of EU law – areas that the tobacco industry has highlighted as being incompatible with plain packaging – the opinion was that this is unlikely to be challenged by European law.³⁴ This is supported by the tobacco industry's own internal documentation, which has shown that they consider that 'current conventions and treaties afford little protection' to plain packaging legislation.³⁵

There is no credible evidence to support tobacco industry claims that such legislation would increase illicit tobacco use, and existing anti-counterfeiting measures would apply to plain packaging. Following consultation with the industry, the Australian plans for plain packaging include placement of a unique alphanumeric code on each pack on a voluntary basis and covert markings including taggart ink, which can only be identified through specialised equipment.

There are also strong grounds to believe that the introduction of plain packaging would be a popular public health measure. A YouGov poll commissioned by ASH in 2010 found that 64 per cent of the UK public would support plain packaging if there was evidence that plain packaging was less likely to give the false impression that one type of cigarette is safer than another.³⁶ Three-quarters of respondents said they would support plain packaging if plain packs made health warnings more effective, and 80 per cent would support plain packaging if plain packs were found to be less attractive to children and young people than branded packs.

Plain packaging in Australia

The Australian Government passed legislation in December 2011 to introduce plain packaging for all tobacco products – the first country in the world to do so. Plain packaging will come into effect from 1 December 2012. In their exposure draft, the Government detailed the colour they intend to use (dark olive brown in a matt finish), the font used on the packaging (Lucinda sans 14 or similar), position of brand name, and shape, size and opening of the packaging, based on testing by an Expert Advisory Group of leading tobacco control experts.³⁷

To counter arguments used by the tobacco industry that such legislation would increase illicit tobacco use, anti-counterfeiting measures were also proposed following consultation with the industry. These include the inclusion of a unique alphanumeric code on each pack on a voluntary basis and covert markings including taggart ink, which can only be identified through specialised equipment.

³³ Davison M. Plain Packaging of Cigarettes: Would it Be Lawful? *Australian Intellectual Property Law Bulletin* 2010; Vol. 23, No. 105. Monash University Faculty of Law Legal Studies Research Paper No. 25. Available at: <http://ssrn.com/abstract=1926473>

³⁴ Buxton R. *The Lawfulness of Requiring Plain Packaging for Tobacco Products: Opinion of Sir Richard Buxton*; 2008. Available at Department of Health website: <http://bit.ly/PPbuxtonopinion>

³⁵ Mahood G. Warnings that tell the truth: breaking new ground in Canada. *Tob Control* 1999; Winter;8(4):356-61. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/10629232>

³⁶ Action on Smoking and Health. *Plain Packaging for tobacco products and Public Opinion in the UK*; 2011. Available at: http://www.ash.org.uk/files/documents/ASH_765.pdf

³⁷ Department of Health and Ageing. *Tobacco Plain Packaging Bill 2011 exposure draft: consultation paper*. Canberra; 2011.

Plain packaging in the UK

The Department of Health in England has committed in its 2011 Tobacco Control Plan that they will consult on options to reduce the promotional impact of tobacco packaging, including plain packaging.³⁸ Health Secretary Andrew Lansley has stated:

"The evidence is clear that packaging helps to recruit smokers, so it makes sense to consider having less attractive packaging. It's wrong that children are being attracted to smoke by glitzy designs on packets."³⁹

Plain packaging would reduce tobacco consumption in the long-term by:

- reducing the attractiveness and appeal of tobacco products, particularly for young people
- increasing the prominence and effectiveness of health warnings
- reducing the ability of packaging to mislead smokers about the harms of smoking , and
- complementing other parts of a comprehensive suite of measures to control tobacco.

Improving health warnings

Health warnings are effective in conveying the dangers of smoking and helping smokers to quit.^{40,41} A multi-country study also showed that the larger and more prominent a health warning, the more likely it was to be recalled.⁴² A multi-country study showed that the larger and more prominent a health warning, the more likely it was to be remembered.⁴³ Evidence also suggests that large picture warnings on the front and back surfaces of tobacco packaging increase their effectiveness among young and adult smokers and non-smokers.^{44,45} To further maximise their visibility, these warnings should be placed on the upper part of the packs.

The current EU Tobacco Products Directive requires the inclusion of machine-based tar, nicotine and carbon monoxide yields on cigarette packs. Evidence suggests that this can serve to promote the mistaken belief that some cigarette brands are less harmful than others and that nicotine causes disease.⁴⁶ Removing this requirement could therefore help to enhance health warnings.

³⁸ Department of Health. *Healthy Lives, Healthy People: A Tobacco Control Plan for England*. HM Government; 2011.

³⁹ Make cigarette packaging plain, government urges. BBC Online. Monday November 21 2010:

<http://www.bbc.co.uk/news/health-11796903>

⁴⁰ Borland R, Wilson N, Fong GT, Hammond D, Cummings KM, Yong HH, Hosking W, Hastings G, Thrasher J, McNeill A. Impact of graphic and text warnings on cigarette packs: findings from four countries over five years. *Tob Control* 2009; Oct;18(5):358-64. Epub 2009 Jun 28. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/19561362>

⁴¹ Borland R, Yong HH, Wilson N, Fong GT, Hammond D, Cummings KM, Hosking W, McNeill A. How reactions to cigarette packet health warnings influence quitting: findings from the ITC Four-Country survey. *Addiction* 2009; Apr;104(4):669-75. Epub 2009 Feb 10. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/19215595>

⁴² Hammond D, Fong GT, Borland R, Cummings KM, McNeill A, Driezen P. Text and graphic warnings on cigarette packages: findings from the international tobacco control four country study. *Am J Prev Med* 2007; Mar;32(3):202-9. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/17296472>

⁴³ Hammond D, Fong GT, Borland R, Cummings KM, McNeill A, Driezen P. Text and graphic warnings on cigarette packages: findings from the international tobacco control four country study. *Am J Prev Med* 2007; Mar;32(3):202-9. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/17296472>

⁴⁴ Shanahan P, Elliott D. *Evaluation of the Effectiveness of the Graphic Health Warnings on Tobacco Product Packaging 2008*. Australian Government Department of Health and Ageing, Canberra; 2009.

⁴⁵ Hammond D. Health warning messages on tobacco products: a review. *Tob Control* 2011; Sep;20(5):327-37. Epub 2011 May 23. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/21606180>

⁴⁶ Kozlowski LT, Goldberg ME, Yost BA, White EL, Sweeney CT, Pillitteri JL. Smokers' misperceptions of light and ultra-light cigarettes may keep them smoking. *Am J Prev Med*. 1998; Jul;15(1):9-16. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/9651633>

Point of sale displays

The Health Act in Westminster in 2009 and the Tobacco and Primary Medical Services (Scotland) Act in 2010 both contained measures to ban tobacco advertising at the point of sale. In England, the 2011 Tobacco Control Plan confirmed that the legislation would be implemented by April 2012 for large retailers and April 2015 for small retailers. Scotland, Wales and Northern Ireland are expected to follow a similar timetable for implementation.

Research has shown that point of sale displays have a direct impact on young people's smoking behaviour. In 2006, almost half of UK teenagers were aware of tobacco display at point of sale and those professing an intention to smoke were more likely to recall brands that they had seen at the point of sale.⁴⁷ In addition, research in Australia⁴⁸ and the USA⁴⁹ has shown that point of sale display advertising of cigarettes normalises tobacco use for children and creates a perception that tobacco is easily obtainable.

There is also evidence that retail displays encourage 'impulse buying' so undermining smokers' attempts to quit.⁵⁰

Jurisdictions that have enforced a ban on tobacco advertising at point of sale have reported a decrease in smoking prevalence among young people.⁵¹ The Canadian Tobacco Use Monitoring Survey for example shows that banning point of sale advertising in most Canadian provinces has coincided with a decrease in smoking rates amongst 15 to 19 year olds from 22 per cent in 2002 to 15 per cent in 2007.⁵² In Iceland, where point of sale displays were made unlawful in 2001, smoking rates among 16 and 17 years olds fell from 56 per cent in 1999 to 46 per cent in 2003.⁵³

The Republic of Ireland implemented a ban on point of sale tobacco displays in July 2009. Research looking at its short-term effects has shown that it has affected youth perceptions of smoking. The research found that the proportion of young people believing that more than a fifth of children their age smoked fell from 62 per cent before the display ban to 46 per cent following it.⁵⁴

In addition, and in contrast to industry claims on the effects on retailers, separate research on the ban in Ireland, using data from AC Nielsen, has shown that the ban had no significant effect in the 12 months after implementation on retail sales of tobacco products, over and above seasonal and long-term trends.⁵⁵ This should help to reduce smoking rates over the long-term, giving retailers time to adapt as a result.

A YouGov survey found that 59 per cent of respondents in England said they were in favour of a ban on the display of tobacco products where they are sold. Only 16 per cent were against the measure.⁵⁶

⁴⁷ Point of Sale Display of Tobacco Products. The Centre for Tobacco Control Research. University of Stirling; 2008.

⁴⁸ Wakefield M, Germain D, Durkin S, Henriksen L. An experimental study of effects on schoolchildren of exposure to point-of-sale cigarette advertising and pack displays. *Health Educ. Res.* 2006; 21: 338-347. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/16702196>

⁴⁹ Henriksen L, Flora JA, Feighery E, Fortmann SP. Effects on youth of exposure to retail advertising. *J Appl Soc Psychol.* 2002; 32: 1771-89

⁵⁰ Wakefield M, Germain D, Henriksen L. The effect of retail cigarette pack displays on impulse purchase. *Addiction* 2008; Feb;103(2):322-8. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/18042190>

⁵¹ According to ASH, Iceland and Thailand, 12 (out of 13) Canadian provinces and territories, the Australian State of Tasmania and the British Virgin Islands have adopted laws to prohibit tobacco advertising at point of sale.

⁵² Canadian Tobacco Use Monitoring Survey: Annual and Semi-Annual Results (1999-2007). Health Canada.

⁵³ The European School Survey Project on Alcohol and Other Drugs (ESPAD). www.espad.org/sa/node.asp?node=730

⁵⁴ Quinn C, Lewis S, Edwards R, McNeill A. Evaluation of the removal of point of sale tobacco promotional displays in Ireland. *Tob Control* 2011; Mar;20(2):151-5. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/21088059>

⁵⁵ Quinn C, Lewis S, Edwards R, McNeill A. Economic evaluation of the removal of point of sale tobacco promotional displays in Ireland. *Tob Control.* 2011; Mar;20(2):151-5. Available at: <http://www.ncbi.nlm.nih.gov/pubmed/21088059>

⁵⁶ *Beyond Smoking Kills*. London: Action on Smoking and Health; 2008.

In Australia, the only country so far to commit to introduce plain packaging, this is being introduced in addition to, and not instead of, display bans. It is seen as a natural progression not an alternative to display bans. Any future plain packaging legislation in the UK must therefore be considered as part of a suite of measures that includes a ban on point of sale tobacco displays.

Tobacco accessories

Accessories such as matches, lighters and cigarette rolling papers are currently exempt from the Tobacco Advertising and Promotion Act, which means there have not been any restrictions on advertising of these products.

In the UK, the filter tips market is worth around £45 million, with roll-your-own (RYO) cigarette papers worth £108 million, and continues to grow.⁵⁷ Both products tend to be sold alongside tobacco, and many RYO cigarette brands have direct connections to tobacco companies. Rizla, for example, has been owned by Imperial Tobacco since 1997.⁵⁸

There is evidence to suggest that the promotion of these accessories is similar to tobacco marketing campaigns, and tobacco accessory manufacturers have sponsored events such as music festivals – presenting them with a positive image among young people by being linked to the event.⁵² The Rizla website for example highlights its sponsorship of music festivals, which included their name alongside one of the arenas at the Rockness festival in 2010.

The Department of Health in England has indicated in its 2011 Tobacco Control Plan that it will examine the impact that the advertising and promotion of smoking accessories, including cigarette papers, has on promoting the use of tobacco products and consider whether further action is needed.

For more information, please contact policy@bhf.org.uk

⁵⁷ Talking Retail: 'New-look packs for Swan's RYO tobacco accessories' (19/04/2011)

<http://www.talkingretail.com/products/product-news/new-look-packs-for-swans-ryo-tobacco-accessories>

⁵⁸ List of Imperial Tobacco Acquisitions 1997 onwards: <http://www.imperial-tobacco.com/index.asp?page=406>