



# TPackSS: Tobacco Pack Surveillance System Smokeless Tobacco Health Warning Label Compliance

## India - 2016



In November 2016, India's health warning labels (HWLs) – which fulfill the Framework Convention on Tobacco Control (FCTC) Article 11 minimum requirements – included the following:

- 1. Warning location** - Located at the top edge of the pack on both sides (diametrically opposite if pack is cylindrical)
- 2. Warning size** - HWL must cover 85 percent on both sides of the package
- 3. Label elements** - Full color graphic with warning text in a single language on each side of the pack with “Warning” printed in white on a red background and the remaining text in white on a black background
- 4. Text size** - The warning message must cover 25 percent on both sides of the package

### Methods:

In November 2016, we implemented a systematic protocol to collect unique smokeless tobacco (SLT) products from four cities in India: Mumbai; New Delhi; Chennai; and, Bengaluru. Fifty-four SLT products were double coded and assessed for compliance with the HWL policy in place at the time of collection.

### Results:

It is noteworthy that the only pack that was compliant with all 4 indicators was a box shaped package, as opposed to cylinder (n=5) or sachet (n=48) package types.

Only seven percent (4/54) had HWL coverage of more than 80 percent on both sides of the package.

### Warning Location

59 percent of the packages had a pictorial health warning at the top edge of the front and back of the package.



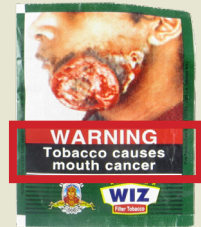
### Warning Size

2 percent of the packages had a health warning that was at least 3.5 cm wide and 4 cm tall, and covered 85 percent of both the front and back of the pack, including 60 percent covered by the graphic.



### Label Elements

72 percent of the packages had full color graphics with warning text in a single language on each side, with “Warning” printed in white on a red background and the remaining text in white on a black background.



### Text Size

6 percent of the packages had the warning message cover 25 percent of the front and back of the package.



# 2%

of the unique SLT products assessed were compliant with all 4 key HWL requirements.

**Areas of Concern:**

**HWL Printing Quality**

There was considerable variation in the printing quality of the graphic. Most of the packs had images that were blurry, faded or had heavy tint, making the HWL appear unclear.



Heavy tint



Faded

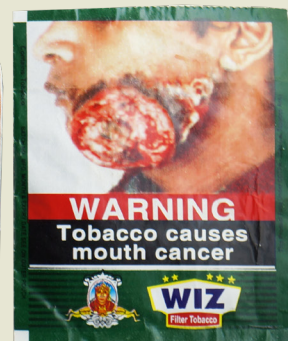


Blurry

**Non-standard Package Size**

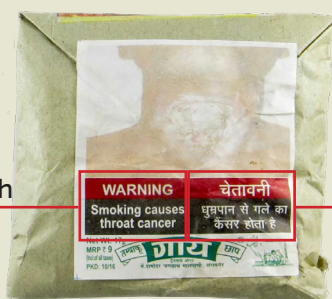
Significant variation was seen in the sizes of the packages. Additionally, some packages were too small to even meet the minimum [height (4cm) and width (3.5cm)] requirement for HWLs.

Too short



**Nonconforming HWL**

English



Hindi



Split/multiple incomplete HWLs appeared on one side of the pack. HWLs were present in two languages on the same side of the pack.

**Out of Rotation HWL**



2008-2011



2011-2013



2013-2015

Graphic images from 2008-11, 2011-13 and 2013-15 cycles were present on the SLT packages available on the market in November 2016.

India needs to monitor on a regular basis whether SLT manufacturing companies are complying with the packaging and labeling laws in India. Although the Indian law aligns well with the FCTC guidelines, this deficit in implementation diminishes the potential health benefits of graphic warning labels on tobacco products.

The work was supported with funding from Bloomberg Philanthropies' Bloomberg Initiative to Reduce Tobacco Use ([www.bloomberg.org](http://www.bloomberg.org))

**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.