

## Cigarette Health Warning Label Compliance

Indonesia, 2022

### Background

Using the TPackSS systematic protocol,<sup>1</sup> cigarette and kretek packs were purchased across three cities in Indonesia (Jakarta, Medan, and Surabaya) during September 2022.

311 unique cigarette and kretek packs displaying mandated Indonesian health warning labels (HWLs) were systematically assessed for compliance with key requirements of Indonesian law: warning location, warning coverage, and warning label elements.<sup>2,3</sup> In addition, three unique packs had out-of-rotation Indonesian HWLs.



**All packs had the warnings in the correct location, and every pack except one had the correct warning label elements.**

Yet, we observed the following areas of concern:

### Obscured Health Warning Labels



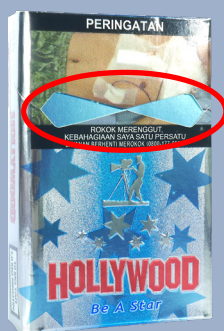
Many of the front and (mainly) back HWLs were covered by tax stamps, obscuring consumer visibility of the HWLs.



Tax stamps fully cover the front (left) and back (right) side “PERINGATAN” (warning) text and partially cover the picture of HWLs.

HWLs **must not be concealed in any way**, including by the tax stamps, according to Indonesian law.

HWL compliance requires **40% coverage** of the **front and back** of the pack.



HWLs with cutouts (red circles) on rounded packs that rendered the coverage area <40%.

### Incomplete Health Warning Labels



Four packs had front HWLs with cutouts (in a bowtie pattern), three of which had round edges and smaller HWL coverage areas than required by the legislation.

### Misleading Terms



Tobacco companies exploit loopholes displaying misleading descriptors, such as “mild” and “slim”, and the wordplay, like “lite”, “mld” and “mil 🐕”.

Allowing brand names and packaging text to include any misleading terms may create an erroneous impression about the product and its impacts on health.<sup>4</sup>



“lite” and “mil 🐕” (red circles) were presented as the wordplay of misleading descriptor of ‘light’ and ‘mild’.




The Indonesian law prohibits **imprinting any statement or symbols on the pack that are misleading or promotional** unless it is part of an established trademark.





## Policy Implications

While we observed overall good HWL compliance in Indonesia in September 2022, the areas of concern highlight opportunities for strengthening the implementation of the required health warning labels and improving their effectiveness:

-  Tax stamps should be placed in a location that provides **unobstructed views of the HWL**, for example, across the side and top of the packs. This way, tax stamps will be destroyed on opening and cannot be reused, and the HWL display will remain unobstructed and prominent. (see example on the left)
-  The finding of HWLs with cutouts in this collection calls for an **explicit ban on any kind of alteration** to the HWLs. Incomplete and reduced HWL coverage compromise the message and effectiveness of the warnings.<sup>5</sup>
-  **Prohibit the use of any misleading descriptors** on the pack, **regardless of the trademark status**. This may include wordplay that connotes promotional or misleading terms, such as “mld” which may suggest “mild”.

## Additional Context

Indonesia’s health warning label requirements during data collection were as follows:

1. 40% coverage of the front and back of the pack, with colored HWL placed on the top of the front and back of the pack.
2. Warning text printed in capital letters and displayed in white on a solid black background.
3. Five sets of unique pictorial HWLs with corresponding text, all in Bahasa Indonesia.

In 2021, Indonesia’s HWL size ranked 128th globally,<sup>6</sup> marking a decline from its previous ranking of 106th.<sup>7</sup>

Although not a Party to the FCTC, Indonesia’s HWLs do not meet the minimum requirements set by Article 11 of the WHO Framework Convention on Tobacco Control (FCTC) which mandates that the HWLs should cover 50% or more of the front and back of the pack.



## References

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