



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



India - 2017

In October and November 2017, India's health warning labels (HWLs) – which fulfill the Framework Convention on Tobacco Control (FCTC) Article 11 minimum requirements – included the following:

1. 85 percent coverage of the front and back of the package, with color pictorial HWLs
2. Health warning text displayed on contrasting background color
3. Health warning text, in English, Hindi, or regional languages

India meets FCTC guidelines for warning size, and was the first country to implement pictorial warnings on smokeless tobacco (SLT) products.

Methods:

In November 2017, we implemented a systematic protocol to collect unique SLT products from rural areas in five states in India: Maharashtra, Rajasthan, Karnataka, Uttar Pradesh, and, Assam. These states represent 40% of India's population. Within each state, five towns were selected for sampling, consisting of one city (population 20,000 – 49,999) and four rural villages (two each with populations of 5,000 – 9,999 and 10,000 – 19,999.¹)

Data collection was focused in rural areas since SLT use is highest among those with lower education, lower income, and those from rural areas.² 133 SLT products were double coded and assessed for compliance with the HWL policy in place at the time of collection.³

Warning Location

36 percent of the packages had a pictorial health warning at the top edge of the front and back of the package, or diametrically opposite on a cylinder package



Warning Size

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



Label Elements

25 percent of the packages had no distortion, 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

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



1%

of the 133 unique SLT products assessed were compliant with all 4 key HWL requirements.

Areas of Concern:

HWL Inconsistencies

These packages display multiple types of printing issues. Production problems resulted in the position of the label shifting, leading the label to become split in many instances. Many health warning labels had inconsistent coloring and a heavy blur. These distortions to the graphic, either on the entire image or the most graphic portion (e.g. cancer tumor) are problematic.



Reference health warning label

Package Content Weight and Price

Sixty-three SLT sachet packages collected displayed a product weight. Sixty percent of the packages were very small, containing less than 1 gram of tobacco. These tobacco packages, on average, had a printed price of 1.8 Indian Rupees (approximately \$0.03). The cost barrier to consume the product is low and can facilitate regular use.

The 10 Indian Rupee coin pictured can purchase almost seven of the 0.6g green packets (1.5 rupees) or one of the 9g blue packet (8 rupees).



Similar issues in HWL printing were observed on SLT products purchased in 2016. India must ensure that poor implementation of HWL requirements is addressed. The lack of consistent, high quality HWLs impacts the most vulnerable of users and those who primarily consume the product: poorer and illiterate people. Although the Indian law aligns well with the FCTC guidelines, these areas of concern diminish the potential health benefits of graphic warning

References:

- ¹ Office of the Registrar General & Census Commissioner, India (2011). http://www.censusindia.gov.in/2011census/A-1_NO_OF_VILLAGES_TOWNS_HOUSEHOLDS_POPULATION_AND_AREA.xlsx (accessed October 29, 2018)
- ² Global Adult Tobacco Survey (GATS) India: 2016-2017. by the Ministry of Health and Family Welfare.
- ³ Notification G.S.R. 727(E), October 15, 2014, Republic of India

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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.