

Submission on Plain Packaging

Date: 3 October, 2012

Submission on behalf of:

Contact name: Skye Te Rangi Kimura

Organisation: Cancer Society of New Zealand

Title/position: National Tobacco Control Advisor

Email: skye.kimura@cancer.org.nz

Phone (day): 04 4947192

Postal address: PO Box 12700

Postcode: 6144

To: Plain Packaging Consultation

Ministry of Health

PO Box 5013

Wellington 6145

- **NO** we do not have any direct or indirect links to the tobacco industry.
- **YES** we give permission for our details to be released under the Official Information Act 1982.

E ngā mana, e ngā reo, e ngā karangatanga maha ō ngā hau e whā. Tēnā koutou, tēnā koutou, tēnā koutou katoa. Nei ra tē mihi tautoko, mai i tē Kahui Mate Pukupuku o Aotearoa.

The Cancer Society of New Zealand would like to thank the Ministry of Health for the opportunity to submit on this important kaupapa.

Contents

Submitter Background.....	3
Introduction	3-4
New Zealand’s International Obligations.....	4
Tobacco Packaging as a Marketing Medium	5
Symbolic Consumption and “Badge” Products	6
Primary and Secondary Demand	6
New Zealand Research Findings.....	7
Summary of Research into Tobacco Packaging	8
Saliency of Health Warnings Featured on Tobacco Packaging	8
Emerging Patterns.....	9
Reductions in Misleading Perceptions of Tobacco Products	10
Likely Effects of Plain Packaging	10
Effects of Plain Packaging on the Appeal of Tobacco Products and Smoking	10
Effects of Plain Packaging on Smokers’ Identity.....	11
Effects of Plain Packaging on Behaviour	11
Effects of Plain Packaging on Māori and Pacific	11
Areas for Further Investigation	12
Dissuasive Sticks.....	12
Limiting Variant Names.....	12
More Diverse Warning Messages	13
Saliency of Quitline Information	13
Summary	13
References	15

Submitter Background

The Cancer Society of New Zealand is a non-profit organisation which aims to minimise the incidence and impact of cancer on all those living in New Zealand. We work across the Cancer Continuum (2003, New Zealand Cancer Control Strategy, MoH) with key work streams that include, provision of Supportive Care, Information, Funding of Research and Health Promotion (www.cancernz.org.nz).

Our Health Promotion Activity includes work across the Ottawa Charter areas of:

- building healthy public policy,
- creating supportive environments,
- strengthening community action,
- developing personal skills, and,
- reorientating health care services towards prevention of illness and promotion of health.

As the largest single preventable cause of cancer, smoking is a key area of work for the Cancer Society. We are committed to promoting a smokefree-free Aotearoa/New Zealand through continued policy advocacy and innovative programmes dedicated to protecting children from exposure to tobacco. We aim to protect children from exposure to smoking and the promotion of tobacco products (www.cantobacco.org.nz).

Our policies strongly recommend:

- Replacing brand imagery with plain packaging and graphic warnings
- Making all locations where young people are present smokefree
- Empowering parents and caregivers to be smokefree to protect their children from becoming smokers.

The Cancer Society of New Zealand would like to congratulate the government for progressing the adoption of plain packaging legislation in New Zealand. We want to see a future with less cancer for future generations and completely support plain packaging being introduced as soon as possible. Introducing plain packaging of tobacco products will contribute to the effectiveness of New Zealand's tobacco control programme and is an essential next step to achieve a Smokefree Aotearoa/ New Zealand by 2025.

Introduction

The Ministry of Health's Consultation document on plain packaging notes the Government is considering introducing plain packaging to address four objectives, namely to:

- Reduce the appeal of tobacco products and smoking, particularly for young people;
- Reduce the wider social acceptance and approval of smoking and tobacco use;
- Increase the noticeability and effectiveness of mandated health warning messages and images, and
- Reduce the likelihood that consumers might acquire false perceptions about the harms of tobacco products.

More generally, the government aims to improve public health by:

- Discouraging people from taking up smoking or using tobacco products;
- Encouraging people to give up smoking and to stop using tobacco products;

- Discouraging people who have given up smoking, or who have stopped using tobacco products, from relapsing;
- Reducing people’s exposure to smoke from tobacco products, and
- Supporting New Zealand to meet its international commitments and obligations under the WHO Framework Convention on Tobacco Control (the FCTC), particularly in relation to the guidelines developed to support implementation of Articles 11 and 13 of the FCTC.

New Zealand’s International Obligations

New Zealand is a signatory to the Framework Convention on Tobacco Control (FCTC), which states defines tobacco advertising and promotion and states:

Article 1 (c): “tobacco advertising and promotion” means any form of commercial communication, recommendation or action with the aim, effect or likely effect of promoting a tobacco product or tobacco use either directly or indirectly.”

New Zealand has further agreed to provisions set out in Articles 11 and 13:

Article 11 (extract)

Adopt and implement, in accordance with its national law, effective measures to ensure that:

- (a) tobacco product packaging and labelling do not promote a tobacco product by any means that are false, misleading, deceptive or likely to create an erroneous impression about its characteristics, health effects, hazards or emissions, including any term, descriptor, trademark, figurative or any other sign that directly or indirectly creates the false impression that a particular tobacco product is less harmful than other tobacco products. These may include terms such as “low tar”, “light”, “ultra-light”, or “mild”; and
- (b) each unit packet and package of tobacco products and any outside packaging and labelling of such products also carry health warnings describing the harmful effects of tobacco use, and may include other appropriate messages. These warnings and messages:
 - i) shall be approved by the competent national authority,
 - (ii) shall be rotating,
 - (iii) shall be large, clear, visible and legible,
 - iv) should be 50% or more of the principal display areas but shall be no less than 30% of the principal display areas,
 - (v) may be in the form of or include pictures or pictograms.

Article 13 (extract)

As a minimum, and in accordance with its constitution or constitutional principles, each Party shall:

- (a) prohibit all forms of tobacco advertising, promotion and sponsorship that promote a tobacco product by any means that are false, misleading or deceptive or likely to create an erroneous impression about its characteristics, health effects, hazards or emissions.

The Cancer Society of New Zealand supports plain packaging. We note that tobacco is a uniquely harmful consumer product responsible for the premature death of half its long-term users. No other legal consumer product causes such widespread harm.

Lung cancer accounted for the most deaths from cancer in 2009 (18.9% of all deaths from cancer). 149.9% for Men and 17.8 for women (Cancer: New registrations and deaths 2009, Wellington, Ministry of Health)

Because governments believe it would be impractical to make tobacco illegal, they have instead regulated its marketing and promotion, its price, and the warnings it must feature. Plain packaging is a logical extension of existing policies and an evidence-based measure that will achieve governments' objective of reducing the myriad harms caused by smoking.

We believe the research to date on plain packaging and its likely effects show it is a proportionate and realistic measure that will contribute to further reductions in smoking prevalence. Our submission addresses the following points: tobacco packaging's role in brand promotion and advertising, evidence relating to the salience of health warnings featured on tobacco packaging; packaging's role in influencing perceptions regarding tobacco's harmfulness, and the likely effects of plain packaging.

1. Tobacco Packaging as a Marketing Medium

Marketers have long recognised the power of packaging to influence consumers' behaviour; and the effect it can have at the point-of-purchase.¹ For products like tobacco, which no longer have traditional broadcast and print media available, packaging is a pivotal medium that retains tobacco companies' ability to communicate directly with existing and future users. In jurisdictions such as New Zealand, packaging is the only major means tobacco companies have to advertise their products and encourage experimentation with smoking. Examination of tobacco industry documents shows that, irrespective of policies that limit traditional media, such as advertising and sponsorship, packaging enables tobacco companies to promote brand attributes and appeal to potential new users.²⁻⁴

Packaging not only maintains communications channels, but represents a crucial point of difference that enables consumers to recognise, and affiliate themselves with, different brands. A Philip Morris document illustrates the tobacco industry's understanding of packaging's role: "Our final communication vehicle with our smoker is the pack itself. In the absence of any other Marketing messages, our packaging -- comprised of the trademark, our design, color and information -- is the sole communicator of our brand essence. Put another way -- when you don't have anything else -- our packaging is our Marketing."⁵

Evidence from industry documents also reveals the meticulous care tobacco companies have taken to research their brands' packaging.^{3 6} The colours, imagery, logos, fonts, sheen and texture that constitute tobacco packages are carefully tested to maximise the

appeal of packaging to specific audiences.⁷ The resulting brands exemplify aspirational attributes, such as glamour and sophistication, or ruggedness and masculinity.^{7 8}

Brands link aspirations, attributes and values to functional products and services; these relationships mean consumers buy branded products as much for their symbolic value as for their utility.^{9 10} Consuming a given brand therefore provides users with a conduit to its specific attributes and explains why tobacco brands are regarded as “badge” products that smokers use to construct and project a social identity.⁶ Packaging is pivotal in conveying these desirable attributes, enhancing the appeal of smoking, and encouraging experimentation.

1.1 Symbolic Consumption and “Badge” Products

Theories of symbolic consumption explain how brands exert a powerful influence on consumers’ behaviour. The associations and images that physical brand insignia give rise to have become critical points of differentiation for tobacco products, which are functionally similar and so rely on emotional and symbolic attributes for their appeal.⁸ More specifically, consumers use physical brand attributes to construct imagery that they draw on and personalise, and use to co-create an identity they project to others.¹¹ Consumers actively construe brand insignia using a reflexive process in which they simultaneously define the imagery, and then use it to define themselves.¹²

This identity creation process enables tobacco manufacturers to sell status, social acceptance, glamour, and adventure, rather than a mere nicotine delivery device.^{7 8 13} Young people place particular value on brands’ symbolic properties and use them to construct social persona that they then communicate to their peers.¹⁴⁻¹⁶

Internal tobacco industry documents reflect a deep understanding of symbolic consumption and reveal detailed research into pack designs, brand insignia, and images, and into consumers’ response to these.^{3 8 17 18} Furthermore, documents highlight the importance the tobacco industry places on young adult smokers and their need for brands that appeal to this group’s uncertainties and aspirations.

Industry documents also make it clear that packaging functions as a powerful and persistent form of advertising to smokers and others in their vicinity. A Brown and Williamson employee stated: “... if you smoke, a cigarette pack is one of the few things you use regularly that makes a statement about you. A cigarette pack is the only thing you take out of your pocket 20 times a day and lay out for everyone to see. That’s a lot different than buying your soap powder in generic packaging.”¹⁹

1.2 Primary and Secondary Demand

Although tobacco companies claim that branding simply stimulates brand switching and alters secondary, not primary, demand, research evidence and internal industry documents question this claim. First, research shows that brand switching is rare as smokers show unusually high levels of brand loyalty; indeed, despite being exposed to numerous brands, many consume only one brand (that is, they are sole brand loyal).²⁰

Second, because smoking kills half its long term users, the tobacco industry’s survival strategy requires that it replenish its supply of users to replace those smokers who die

prematurely of their addiction (i.e., before they deliver maximum profit). Tobacco companies must generate primary demand (i.e., recruit new users) or face the prospect that their market will steadily decline. Evidence from tobacco industry documents shows how acutely aware tobacco companies are of this reality, and their dependence on packaging to attract new users, especially in markets where other promotion options have been curtailed.²¹ Industry documents reveal the striking importance of attracting new smokers; a document from RJ Reynolds cited in the Mangini case states: “Younger adult smokers have been the critical factor in the growth and decline of every major brand and company of the last 50 years. They will continue to be just as important to brands/companies in the next 50 years for two simple reasons:

- The renewal of the market stems almost entirely from 18-year-old smokers. No more than 5% of smokers start after age 24;
- The brand loyalty of 18-year old smokers far outweighs any tendency to switch with age.”²²

Quotes such as these, which are evident in other documents housed in the Legacy Collection, confirm that tobacco packages are designed to appeal to potential purchasers, including young people who may not yet be smoking, but who could become attracted to it.

1.3 New Zealand Research Findings

New Zealand research has also shown the role packaging fulfils in advertising tobacco brands and smoking. Young people’s use of brand imagery to construct their public persona first stimulated interest in plain packaging nearly two decades ago when Canadian and New Zealand researchers independently examined how young people perceived plain packaging.²³ Researchers reported that young people had consistently more negative impressions of plain packs relative to branded cigarette packs.²⁴ These findings are consistent with international research, which concluded that adolescent and young adult respondents regarded plain packages as old fashioned and boring, and thought fewer people would smoke if cigarettes were sold in plain packages.²⁵⁻²⁷ Overall, these studies concluded that reducing on-pack brand insignia would diminish the physical and social attractiveness of tobacco products, promote cessation among some smokers, and reduce initiation among those experimenting with tobacco.

Recent New Zealand studies confirm these findings and lend further support to the conclusion that packaging functions as advertising. In depth interviews and focus groups conducted with young adult smokers and non-smokers found that tobacco brand imagery appealed to young adults while plain packaging rendered tobacco products dull and unattractive.^{12 28} In a study examining brand-attribute associations, participants associated distinctive attributes with tobacco brands on the basis of packaging alone, irrespective of their past exposure to the brand. That is, even with no smoking history and no knowledge of the brand shown, participants could easily construct an identity for the type of person to whom the brand would appeal.^{13 29} Indeed, and contrary to our expectations, non-smokers made more favourable brand-attribute associations than smokers. However, both groups described Basic, a near generic brand, as ‘plain’ or ‘budget’, to have attractive features.²⁹ These studies provide further evidence of packaging’s role in communicating attributes that enhance the appeal of tobacco brands.

1.4 Summary of Research into Tobacco Packaging

Given evidence from industry documents, marketing theory, and empirical studies, there can be no doubt that packaging functions as a marketing medium and communicates aspirational and attractive brand attributes. A participant in a recent Norwegian study of tobacco branding and plain packaging summed up the role branding plays in smoking initiation: “It’s like, if I see someone smoking white Kent, and another smoking Teddys, then I see the difference. It says something about the person. I’m thinking, you start using a brand because you feel you belong to it, that you’re connecting with it. It has something to do with the logo, I think.”³⁰

By functioning in the same way as advertising, on-pack branding breaches Article 13 of the FCTC and refutes tobacco companies’ claims that pack livery serves only as an identifying device that only simplifies existing smokers’ decision-making. Given this evidence, we believe New Zealand should mandate the plain packaging policies of all tobacco products; this policy would be consistent with our FCTC obligations to eliminate all tobacco advertising and promotion.

2. Salience of Health Warnings Featured on Tobacco Packaging

Several studies have compared text-only and pictorial health warnings (see Hammond for a review of these).³¹ Because plain packaging has only recently re-entered policy debates, fewer studies have examined how it would affect the recall and relative prominence of health warnings. We summarise some key findings below.

A recent comprehensive review of tobacco warning labels reported several findings relevant to plain packaging.³¹ Hammond reported that health warnings’ salience depends on their size and position and found “Youth and adults are more likely to recall larger warnings, rate larger warnings as having greater impact, and often equate the size of the warning with the magnitude of the risk.” (p3 online version). Importantly, Hammond noted that graphical features that differentiated the warning message from the pack design increased the impact of the warning. While he examined techniques such as using boxes around the warning, these findings can be logically extended to apply to plain packaging, where use of perimeters to distinguish the warning from the brand will no longer be necessary.

Early studies into plain packaging and warnings concluded removing brand imagery would enhance the impact of health warnings.^{24 26} Conducted before the advent of pictorial health warnings, both studies suggested that plain packaging would make health warnings more noticeable. More recently, researchers have examined the effect plain packaging would have on pictorial health warnings, which have been in place in New Zealand since 2008 and in other countries prior to this point.

Recent evidence shows that warning labels help prevent relapse among smokers who have become smokefree.³² Because pack warnings will be present at the point when smokers might be tempted to resume smoking, it is important that these are as visually impactful and salient as possible to reduce the risk of relapse. As plain packaging enhances the

visual impact of warnings, it is logical to infer that it will also help prevent relapse among smokers who could otherwise resume smoking.

Overall, the findings appear clear. The more warnings stand out, the higher the recall levels they generate. The research to date shows that introducing pictorial elements increases the salience and impact of warning labels,^{33 34} while studies conducted thus far suggest removing competing visual elements in the form of brand imagery and logos will further enhance the impact of health warnings.

2.1 Emerging Patterns

International evidence suggests tobacco companies are using pack innovations to attract attention and interest, and prompt experimentation. A recent Australian study found bevelled and rounded pack shapes were seen as most attractive (more attractive than standard square cornered packs).³⁵ The bevelled shape was also seen as more distracting to health warnings, particularly relative to the square shaped packs. UK research has also highlighted the specific appeal particular pack designs have, notably the “perfume” shaped packages designed to attract young women.³⁶

Comments on packaging websites also provide insights into how tobacco companies are using pack designs to reduce the impact and effect of health warnings. The commentator compared: “Plain white cartons with horrendous graphics popping off the packs [with] high-technology printed beautiful cartons, which without doubt will soften the impact of the same horrendous graphics.”³⁷

Evidence presented in a recent ASPIRE2025 seminar showed how pack designs extended into health warnings so these were less obvious and appeared to merge into the brand design. Figure 1 below illustrates this phenomenon.

Figure 1: Example of Reduced Impact Health Warning



Source: Wakefield, M. ASPIRE2025 presentation, 18 September, 2012.

Evidence that tobacco companies are using brand imagery to reduce the visual impact of on-pack warnings provides further justification for plain packaging and much larger health warnings. Dissuasive backgrounds could not visually merge with health warnings and larger warnings would dominate the pack surface, thus maximising the attention paid to the messages featured.

3. Reductions in Misleading Perceptions of Tobacco Products

Several studies have examined how tobacco branding has created misleading perceptions about the harms caused by tobacco products. This deception has occurred in two ways: first, through the use of misleading variants names, particularly “light” and “mild” and, second, through the use of colour to create the impression of reduced harm products. Moodie et al. provide a detailed overview of this research and conclude that plain packaging can reduce misperceptions about the relative harmfulness of different variants (p.58). Research shows smokers associate reduced tar and harm with packs coloured silver and gold;³⁸ plain packaging would clearly eliminate this source of deceptive information and would eliminate the conflict between on-pack warnings and the colours used to undermine the import of these.

4. Likely Effects of Plain Packaging

The research evidence suggests plain packaging will reduce the appeal of tobacco products and smoking, impede smokers’ ability to draw on brand attributes as they construct their own social personae; influence their smoking and cessation behaviour, and be important in addressing health inequalities. We examine each of these factors below.

4.1 Effects of Plain Packaging on the Appeal of Tobacco Products and Smoking

Research examining the attractiveness of tobacco branding and the effect plain packaging has on perceptions of pack attractiveness has consistently found that progressive removal of brand elements results in predictable declines in perceived pack attractiveness.³⁹⁻⁴² Studies examining perceived attractiveness, attribute associations, and pack appeal have all concluded that removing brand elements is associated with a decline in positive evaluations. A behavioural choice study undertaken in New Zealand reached identical conclusions; new data from a larger replication study that tests and extends the 2009 data has confirmed these conclusions.

Qualitative and survey-based studies have reached similar conclusions. A Scottish online study found adolescents regarded plain packages as unfashionable and unattractive.⁴³ Studies using samples of young women found plain packages were significantly less attractive than those that targeted women⁴⁴ and, in a later study, plain packages were significantly less attractive than any package that featured branding, even when this targeted men rather than women.⁴⁵

A small scale ecological study with 140 young adult Glasgow smokers found smoking cigarettes taken from a plain package to be a significantly more negative experience in relation to perceived stylishness, coolness, fashionability, attractiveness and appeal.⁴⁶ Recent work reported from Norway reinforces these conclusions; the researchers found perceptions of plain packaged tobacco products were consistently less positive than those of branded products.³⁰

Studies examining the perceived quality of tobacco products from plain packages suggest plain packaging diminishes quality perceptions and the perceived experience of smoking a cigarette from a plain package.^{40 41} Perceptions of the likely taste, flavour, and smoothness of cigarettes sourced from plain packages were consistently and significantly lower relative to scores for products taken from branded packages.^{38 47 48}

4.2 Effects of Plain Packaging on Smokers' Identity

Data from qualitative studies using New Zealand samples show that tobacco brands have unique and highly attractive attributes that appeal to specific sub-groups within the wider population of smokers.^{12 28} Plain packaging removes the attributes that smokers, particularly younger smokers, use to construct and project their social identities. Evidence from recent studies shows that plain packaging reduces positive attribute association with tobacco packages;^{40 49} these findings support evidence from the quantitative studies discussed above.

4.3 Effects of Plain Packaging on Behaviour

Recent studies have used varied methods to estimate likely behavioural responses to plain packaging. New Zealand research used a choice-based methodology to estimate the effects of progressive reductions in brand elements and a probability scale to estimate the likely effects on cessation related behaviours.³⁹ The findings suggest plain packaging would significantly increase the likelihood that smokers will seek support to quit, reduce the number of cigarettes they smoke, and make a quit attempt. A European study supports these conclusions and found that plain packages were seen as most likely to promote cessation among smokers who intended to quit.⁵⁰

Moodie and colleagues used a pilot naturalistic approach to assess smokers' responses to plain packaging.⁴⁶ They reported that plain packaging increased the likelihood smokers would avoid displaying tobacco packaging (either by hiding or covering the pack). In addition, they noted that plain packaging had stimulated other cessation-linked behaviours, such as forgoing cigarettes and smoking less around others, and had increased thoughts about quitting. In reporting on the longitudinal International Tobacco Control (ITC) study, Borland had earlier found these behaviours predictive of quit attempts and subsequent cessation.⁵¹

4.4 Effects of Plain Packaging on Māori and Pacific

The factors that influence Māori and Pacific to smoke are complex and while overall smoking rates have reduced over recent years, the Māori and Pacific rates remain higher than non-Māori/Pacific at levels that are inconsistent with Māori and Pacific aspirations.

The Cancer Society considers that plain packaging, together with the suite of tobacco-control measures recommended in the Māori Affairs Select Committee Report, will contribute to reduced uptake and increased cessation for Māori and Pacific smokers. Given the relative youth of both Māori and Pacific people, and the increasing proportion of the youth population that are Māori and Pacific, efforts to address and lower uptake among these groups are of increased importance. Surreptitious marketing through packaging cannot be allowed to continue, and is clearly at odds with the current point-of-sale practice in Aotearoa/New Zealand. Furthermore, a recent report from the UK

indicated that plain packaging will lessen inequalities (UK Equality Impact Assessment report, Department of Health, London, 2012).

4.5 Areas for Further Investigation

We believe there are at least four areas where New Zealand could improve on the policy implemented in Australia:

- Requiring dissuasive cigarette sticks;
- Specifying the variant names that may be used to reflect current practice (i.e., avoiding the ‘poetry on a package’ that appears likely to occur in Australia);
- Introducing a wider array of well-research pictorial warnings, and
- Reformatting the Quitline information so this is more visually salient.

In addition, we strongly recommend that the Ministry put in place a multi-faceted evaluation to gauge plain packaging’s effects on perceptions of smoking, impact of warnings, understanding of smoking’s harms, and smoking behaviour. We recommend discussion with Australian researchers, who have a very detailed evaluation programme underway.

4.6 Dissuasive Sticks

A small scale qualitative study revealed that dissuasively coloured cigarette sticks further reduced the appeal of smoking and would be likely to deter smoking initiation.⁵² Further work is underway to test these findings among a wider sample of smokers. Given the strong reactions against dissuasively coloured sticks, which social smokers found particularly dissuasive, we recommend consideration be given to this potential measure.

4.7 Limiting Variant Names

Evidence from Australia suggests tobacco companies have responded to plain packaging by extending the variant names they associate with tobacco brands. The net effect of this will be to retail evocative descriptions on packages. Figure 2 provides an example of variant name changes tobacco companies are making.

Figure 2: Extension of Brand Variant Names

TMC BRANDS		Dunhill	
CURRENT Brand Variant Descriptors	New Brand Variant Descriptors		
Winfield		Fine Cut	Fine Cut Burgundy
Silver	Grey	Fine Cut	Fine Cut Navy
Ultimate	White	Fine Cut	Fine Cut White
Winfield Optimum		Premier	Premier Red
Night	Crush Blue	Distinct	Distinct Blue
Sky	Crush Sky	Refined	Refined Grey
		Infinite	Infinite White
		Chilled	Release Chilled Menthol
		Frosted	Release Frosted Menthol
		Blonde	Blonde Blend

Source:
Wakefield, M.
ASPIRE2
025
presentation,

18 September, 2012.

4.8 More Diverse Warning Messages

The most cost-effective messages are clearly those that have a wide population effect, resonate with and influence smokers from different demographic groups. However, recent research indicates that warning messages do ‘wear out’ and require refreshment;³¹ furthermore, emerging findings suggest the health themes that have dominated pictorial warning labels (PWLs) may resonate less effectively with younger smokers, who use self-exempting strategies to distance themselves from the effects depicted.⁵³ We recommend that plain pack implementation be accompanied by a review of on-pack warnings to identify those that offer comprehensive coverage as well as those required to reach specific smoker sub-groups.

4.9 Salience of Quitline Information

When PWLs were introduced in 2008, the Quitline number and a cessation support message were included on packs. Evidence from Quitline suggests this policy led to an increase in the number of callers citing the tobacco package as the source of Quitline information.⁵⁴ However, the information provided lacks visual salience and a recent qualitative study suggests reformatted information could be more easily understood and more likely to stimulate calls to the Quitline.⁵⁵ Figure 3 contrasts current and potential formats. We recommend that plain pack implementation be accompanied by a review of how Quit information is presented in on-pack warnings and the potential for inclusion of Quick Response (QR) imagery that would provide a direct connection to the Quitline website.

Figure 3: Current and Potential Pack Formats



Summary

Several studies have examined the likely effects of plain packaging and reported highly consistent findings, namely that plain packaging will increase the salience of health warnings, reduce false perceptions regarding harm, and decrease the attractiveness of smoking. Despite arguments from tobacco companies that plain packaging will have no effect, the published evidence clearly and consistently suggests it will decrease the appeal of tobacco brands and diminish the experience of smoking. Moodie *et al.* have recently completed a comprehensive systematic review of plain packaging research in which they document and analyse this evidence.

Tobacco companies have argued plain packaging should not be introduced because its effects have not yet been proven. We note the logical inconsistency in this claim: it is impossible to prove the effects of a policy that has not yet been introduced. We also note that tobacco companies have opposed other proportionate and effective measures, such as pictorial health warnings, which subsequent research has shown to promote awareness of smoking's harms, stimulate quit-related thoughts, and increase actual quit attempts.^{34 56-59}

In situations where policy evaluations are not available, policy makers need instead to examine findings from experimental studies that estimate the likely effects of plain packaging, consider theory, and review evidence from the tobacco industry's own documents. As noted above, this evidence base is now well-developed and provides strong evidence that plain packaging will achieve the government's objectives of reducing the appeal of tobacco products and smoking, and the wider social acceptance and approval of smoking and tobacco use. Further, the evidence shows plain packaging will reduce the likelihood that consumers might acquire false perceptions about the harms of tobacco products and will increase the noticeability and effectiveness of mandated health warning messages and images.

Finally, the Cancer Society believes that implementing plain packaging will ensure that our children do not become the next generation of adult smokers.

Tēnā, whakarongo mai ki ngā kupu e rere mai nei i ngā ngutu ō ō tātou tamariki, mokopuna!

Tēnā, whakaoko mai nei ki ngā kōingo, ngā pūmanawa, ngā ngākau hihiri ō ngā whānau, ngā hapū, ngā iwi whānui nei!

Tēnā, kia mau tonu ki ngā wawata ā ō tātou tīpuna, kia whai i te ara tika mō tātou, ā, mō ngā uri ā muri ake nei.

Nō reira, ānei te whakamiha, te tono hoki ki a koutou ngā kaitiaki o te oranga o ō tātou whānau, hapū, iwi nō ngā tai e whā kia toro mai i ō koutou ringa raupī ki a tātou ngā kanohi ora. Me whakapā atu i ō koutou ringa raupā ki ngā uri whakaheke mai.

Mauri ora ki a tātou katoa, nā

Te Roopu Mate Pukupuku o Aotearoa.

Skye Te Rangi Kimura- National Tobacco Control Advisor

Signed: _____

References

1. Pilditch J. *The Silent Salesman: How to Develop Packaging that Sells*. London: Harper and Row, 1961.
2. Wakefield M, Letcher T. My pack is cuter than your pack. *Tobacco Control* 2002;11:154-56.
3. Wakefield M, Morley C, Horan J, Cummings K. The cigarette pack as image: New evidence from tobacco industry documents. *Tobacco Control* 2002;11(Suppl i):i73-i80.
4. Freeman B, Chapman S, Rimmer M. The case for the plain packaging of tobacco products. *Addiction* 2008;103:580-90.
5. Hult M. Marketing issues corporate affairs conference. Richmond, Virginia: : Philip Morris, 1994:Bates No. 2504015017/5042.
6. Pollay RW. How cigarette advertising works: Rich imagery and poor information., 2000b.
7. Carter S. The Australian cigarette brand as product, person, and symbol. *Tobacco Control* 2003;12:79-86.
8. Dewhirst T, Davis B. Brand strategy and integrated marketing communication. *Journal of Advertising* 2005;34:81-92.
9. Aaker J. Dimensions of brand personality. *Journal of Marketing Research* 1997;34(August):347-57.
10. Sabbane LI, Lowrey TM, Chebat J-C. The effectiveness of cigarette warning label threats on nonsmoking adolescents. *Journal of Consumer Affairs* 2009;43(2):332-.
11. Belk R. Possessions and the extended self. *Journal of Consumer Research* 1988;15:139-68.
12. Hoek J, Gendall P, Gifford H, Pirikahu G, McCool J, Pene G, et al. Tobacco Branding, Plain Packaging, Pictorial Warnings, and Symbolic Consumption. *Qualitative Health Research* 2012;22(5):630-39.
13. Eadie D, Hastings G, Stead M, MacKintosh A. Branding: Could it hold the key to future tobacco reduction policy? *Health Education* 1999;3(May):103-09.
14. Lennon A, Gallois C, Owen N, McDermott L. Young Women as Smokers and Nonsmokers: A Qualitative Social Identity Approach. *Qualitative Health Research* 2005;15(10):1345-59.
15. Scheffels J, Lund KE. Occasional Smoking in Adolescence: Constructing an Identity of Control. *Journal of Youth Studies* 2005;8(4):445 - 60.
16. Scheffels J, Schou KC. To be one who continues to smoke: Construction of legitimacy and meaning in young adults' accounts of smoking. *Addiction Research & Theory* 2007;15(2):161-76.

17. Chapman S, Carter S. Avoid health warnings on all tobacco products for just as long as we can”: A history of Australian tobacco industry efforts to avoid, delay and dilute health warnings on cigarettes. *Tobacco Control* 2003;12(Suppl. III):iii3-iii22.
18. Cummings K, Morley C, Horan J, Steger C, Leavell N-R. Marketing to America’s youth: Evidence from corporate documents. *Tobacco Control* 2002;11(Suppl. I):i5-i17.
19. Brown & Williamson Tobacco Company. Speech Notes: Bates No: 699126062 - 6073, 1998.
20. DiFranza JR, Eddy JJ, Brown LF, Ryan JL, Bogojavlensky A. Tobacco acquisition and cigarette brand selection among youth. *Tobacco Control* 1994;3(4):334.
21. Krugman DM, Quinn WH, Sung Y, Morrison M. Understanding the role of cigarette promotion and youth smoking in a changing marketing environment. *Journal of Health Communication* 2005;10(261-278).
22. R.J. Reynolds Tobacco Company. Younger Adult Smokers: Strategies and Opportunities. In: 503049069-9075 BN, editor, 1998.
23. Laugesen M. Tobacco promotion through product packaging In: Board NZTS, editor. Wellington: Department of Health, 1989.
24. Beede P, Lawson R. The effect of plain packages on the perception of cigarette health warnings. *Public Health* 1992;106:315-22.
25. Rootman I, Flay B. A study on youth smoking. In: Promotion CfH, editor. Toronto: University of Toronto, 1995:Bates No. 2047549321-336.
26. Goldberg M, Kindra G, Lefebvre J, et al. When packages can’t speak: possible impacts of plain and generic packaging of tobacco products: Expert Panel Report prepared at request of Health Canada, 1995.
27. Goldberg M, Liefeld J, Madill J, et al. The effect of plain packaging on response to health warnings. *American Journal of Public Health* 1999;89:1434.
28. Gendall P, Hoek J, Edwards R, Gifford H, Pirikahu G, Pene G, et al. Young Adults’ Interpretations of Tobacco Brands: Implications for Tobacco Control. *Nicotine & Tobacco Research* 2011;13(10):911-18.
29. Gendall P, Hoek J, Edwards R, McCool J. A Cross-Sectional Analysis of How Young Adults Perceive Tobacco Brands: Implications for FCTC Signatories. *BMC Public Health* 2012 (in press).
30. Scheffels J, Sæbø G. Perceptions of Plain and Branded Cigarette Packaging Among Norwegian Youth and Adults: A Focus Group Study. *Nicotine & Tobacco Research* 2012.
31. Hammond D. Health warning messages on tobacco products: a review. *Tobacco Control* 2011;20(5):327-37.
32. Partos TR, Borland R, Yong H-H, Thrasher J, Hammond D. Cigarette packet warning labels can prevent relapse: findings from the International Tobacco Control 4-Country policy evaluation cohort study. *Tobacco Control* 2012.

33. Borland R, Wilson N, Fong G, Hammond D, Cummings K, Yong H, et al. Impact of graphic and text warnings on cigarette packs: Findings from four countries over five years. *Tobacco Control* 2009;18(5):358-64.
34. Fong GT, Hammond D, Hitchman SC. The impact of pictures on the effectiveness of tobacco warnings. *Bulletin of the World Health Organization* 2009;87(8):640-3.
35. Borland R, Savvas S, Sharkie F, Moore K. The impact of structural packaging design on young adult smokers' perceptions of tobacco products. *Tobacco Control* 2011.
36. Moodie C, Ford A. Young adult smokers' perceptions of cigarette pack innovation, pack colour and plain packaging. *Australasian Marketing Journal (AMJ)* 2011;19(3):174-80.
37. Anonymous. Horrendous Graphics Softened by High-Technology Printing, 2009.
38. Hammond D, Dockrell M, Arnott D, Lee A, McNeill A. Cigarette pack design and perceptions of risk among UK adults and youth. *European Journal of Public Health* 2009;19(6):631-37.
39. Hoek J, Wong C, Gendall P, Louviere J, Cong K. Effects of dissuasive packaging on young adult smokers. *Tobacco Control* 2011;20(3):183-88.
40. Germain D, Wakefield M, Durkin S. Adolescents' perceptions of cigarette brand image: does plain packaging make a difference? *J Adolesc Health* 2010;46:385-92.
41. Wakefield M, Germain D, Durkin S. How does increasingly plainer cigarette packaging influence adult smokers' perceptions about brand image? An experimental study. *Tobacco Control* 2008;17(6):416-21.
42. Wakefield M, Germain D, Durkin S, Hammond D, Goldberg M, Borland R. Do larger pictorial health warnings diminish the need for plain packaging of cigarettes? *Addiction* 2012;107(6):1159-67.
43. Moodie C, Ford A, Mackintosh AM, Hastings G. Young People's Perceptions of Cigarette Packaging and Plain Packaging: An Online Survey. *Nicotine & Tobacco Research* 2012;14(1):98-105.
44. Doxey J, Hammond D. Deadly in pink: the impact of cigarette packaging among young women. *Tobacco Control* 2011.
45. Hammond D, Doxey J, Daniel S, Bansal-Travers M. Impact of Female-Oriented Cigarette Packaging in the United States. *Nicotine & Tobacco Research* 2011;13(7):579-88.
46. Moodie C, Mackintosh AM, Hastings G, Ford A. Young adult smokers' perceptions of plain packaging: a pilot naturalistic study. *Tobacco Control* 2011.
47. Bansal-Travers M, Hammond D, Smith P, Cummings KM. The impact of cigarette pack design, descriptors, and warning labels on risk perception in the US. *American Journal of Preventive Medicine* 2011;40(6):674-82.
48. Hammond D, Daniel S, White CM. The Effect of Cigarette Branding and Plain Packaging on Female Youth in the United Kingdom. *Journal of Adolescent Health* 2012.

49. White CM, Hammond D, Thrasher JF, Fong GT. The potential impact of plain packaging of cigarette products among Brazilian young women: an experimental study. *BMC Public Health* 2012;12(1):737.
50. Gallopel-Morvan K, Moodie C, Hammond D, Eker F, Beguinot E, Martinet Y. Consumer perceptions of cigarette pack design in France: a comparison of regular, limited edition and plain packaging. *Tobacco Control* 2012;21(5):502-06.
51. Borland R, Yong H, Wilson N, Fong G, Hammond D, Cummings K, et al. How reactions to cigarette packet health warnings influence quitting: findings from the ITC Four-Country survey. *Addiction* 2009;104(4):669-75.
52. Hoek J, Robertson C, McNeill L. The Next Step? Smokers' Interpretations of Dissuasive Cigarette Sticks. under review.
53. Hoek J, Hoek-Sims A, Gendall P. Temporal Construal and Young Adult Smokers' Responses to Smoking Warnings. Under review.
54. Li J, Grigg M. New Zealand: new graphic warnings encourage registrations with the quitline. *Tobacco Control* 2009;18(1):72.
55. An Evaluation of Alternative On-pack Quitline Information Formats. 15th World Conference on Tobacco or Health; 2012 20-24 March Singapore. World Conference on Tobacco or Health.
56. 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. *American Journal of Preventive Medicine* 2007;32(3):202-09.
57. Hammond D, Fong GT, McDonald PW, Brown KS, Cameron R. Graphic Canadian cigarette warning labels and adverse outcomes: Evidence from Canadian smokers. *American Journal of Public Health* 2004;94(8):1442-45.
58. Hammond D, Fong GT, McDonald PW, Cameron R, Brown KS. Impact of the graphic Canadian warning labels on adult smoking behaviour. *Tobacco Control* 2003;12:391-95.
59. Hammond D, Fong GT, McNeill A, Borland R, Cummings KM. Effectiveness of cigarette warning labels in informing smokers about the risks of smoking: findings from the International Tobacco Control (ITC) Four Country Survey. *Tobacco Control* 2006;15(Suppl III):19-25.