



Public Health
England

Response to the government consultation on the introduction of regulations for standardised packaging of tobacco products

August 2014

About Public Health England

Public Health England exists to protect and improve the nation's health and wellbeing, and reduce health inequalities. It does this through advocacy, partnerships, world-class science, knowledge and intelligence, and the delivery of specialist public health services. PHE is an operationally autonomous executive agency of the Department of Health.

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Executive summary

Public Health England wants to see long-term reductions in youth smoking that build upon the success already achieved under the Tobacco Control Plan for England. Removal of tobacco companies' ability to engage young people through marketing, improved knowledge of the health harms and fewer smoking role models are all essential to achieving a tobacco free generation. As a powerful addition to the existing levers at our disposal, we believe standardised packaging could be the game changer.

In our submission to the Chantler review into standardised packaging of tobacco products, PHE set out our view that the evidence made a substantial and compelling case for the introduction of standardised packaging as an effective measure to tackle the serious public health problem of smoking.

The evidence base on standardised packaging has expanded considerably since the 2012 government consultation, with the publication of numerous peer-reviewed research studies and real world post-implementation evidence from Australia. As a result, the case for standardised packaging has been strengthened further.

The evidence is clear that standardised packaging increases the effectiveness of health warnings and reduces the appeal of cigarette packaging to young people and adults. It removes a powerful marketing tool and the ability to influence perceptions about the relative risk between cigarette brands. Standardised packaging influences behaviour, encouraging smokers to reduce their smoking and to quit.

In Australia, official data is already demonstrating the impact. Its latest national triennial survey shows the fastest decline in smoking rates in over 20 years, and customs and excise data shows a fall of 3.4% in tobacco sales by volume in the first year of standardised packaging.

As part of a comprehensive programme of tobacco control, standardised packaging makes a powerful contribution to the de-normalisation of smoking as a socially acceptable behaviour. The potential benefits to public health should not be underestimated. In addition, by helping to reduce spending on tobacco, standardised packaging could bring real economic benefit to our most deprived communities.

Smoking is one of the nation's most serious public health challenges, with the greatest harm suffered by the least advantaged in society. The evidence for the benefits standardised packaging can deliver is now irrefutable. To delay its introduction is to delay our receipt of those benefits.

Responses to consultation questions

Question 1: Do you have any observations about the report of the Chantler Review that you wish to bring to our attention?

In our submission to the Chantler review into standardised packaging of tobacco products, Public Health England set out our view that the evidence made a substantial and compelling case for the introduction of standardised packaging as an effective measure to tackle the serious public health problem of smoking.

We warmly welcomed the report of the review and Sir Cyril Chantler's conclusion that: "...there is sufficient evidence derived from independent sources that the introduction of standardised packaging as part of a comprehensive policy of tobacco control measures would be very likely over time to contribute to a modest but important reduction in smoking prevalence especially in children and young adults."

The additional evidence since Sir Cyril conducted his review – in particular the early data emerging from Australia – lends further support to his conclusion and indeed indicates that his prediction on the positive impact of the introduction of standardised packaging on smoking prevalence may be surpassed.

Question 2: Do you have any information, in particular any new or additional information since the 2012 consultation, relating to the wider aspects of standardised packaging, that you wish to bring to our attention?

The evidence base on standardised packaging has expanded considerably since the 2012 government consultation, with the publication of numerous peer-reviewed research studies and real world post-implementation evidence from Australia. The case for standardised packaging, which was already strong, has been strengthened further.

An expert elicitation study of 33 international tobacco control experts examined potential magnitudes of effect if standardised packs were introduced. The authors of the study concluded that the most likely outcome would be a reduction in the prevalence of cigarette smoking particularly among young people. No experts judged an increase in smoking prevalence as a likely outcome.¹

The Australian experience

The early experience of Australia, which introduced standardised packaging in December 2012, bears striking testimony to the impact of standardised packaging as part of a comprehensive programme of tobacco control. According to the latest official national survey of tobacco use, the daily smoking rate fell markedly from 15.1% to

12.8% between 2010 and 2013 – a record 15.2% decline.² A number of factors will have contributed to this, including tax rises, bans on point-of sale retail displays and media campaigns, but the introduction of standardised packaging in year three is a major contributor to the fastest ever drop in smoking rates since the start of the triennial survey in 1991. The data on tobacco sales also presents an encouraging picture: Australian Treasury customs and excise data showed a fall of 3.4% in tobacco sales by volume in the first year of standardised packaging.³ Once again, while the fall cannot be attributed solely to standardised packaging, it must be considered to have been a significant contributing factor.

In our submission to the Chantler review, we pointed out that the evidence supporting the case for standardised packaging had been, by necessity, measures of process rather than measures of outcome. The new data demonstrating the real-world impact in Australia moves us beyond that point, providing clear evidence of positive outcome.

The tobacco industry continues to publish its own figures and commission its own research and analysis in an attempt to counter the evidence, including on youth uptake.⁴ This has been judged by academics and experts as lacking in rigour and credibility.⁵ We urge caution in the consideration of any evidence from the tobacco industry, which has a strong vested interest in the outcome of this consultation.

Peer-reviewed research

The 2012 systematic review of the evidence on standardised packaging commissioned under the Department of Health Policy Research Programme⁶ was extensively cited in the last consultation. We will not therefore cite it in this section.

The Hammond review for the Irish Government

A more recent review commissioned by the Irish Government and published in March 2014 assessed available scientific evidence into the potential effects of plain standardised packs.⁷ The review considered findings from 75 studies including 11 from the UK, and concluded:

“There is sufficient evidence to conclude beyond a reasonable doubt that plain packaging would help Ireland to achieve its public health policy objectives in relation to tobacco control.”

The results from the 75 studies included in the Hammond review were harmonised into six themes: health warnings; perceptions of risk; consumer appeal; measures of consumer demand and smoking behaviour; post implementation impact in Australia; and plain pack colour. Its conclusions are summarised below.

Health warnings

Health warnings were more noticeable on plain packs, with greater recall of warnings which could lead to greater cognitive processing, particularly among young non-smokers. Plain standardised packs with large health warnings were found to be complementary measures.

Perceptions of risk

Differences in pack design and colours created a false sense of relative risk between cigarette brands. Plain standardised packs were associated with fewer false beliefs of relative risk and harm caused by cigarettes.

Consumer appeal

Plain standardised packs were less appealing and desirable to young people and young adults including smokers and non-smokers. They were also associated with less positive brand imagery such as 'cool' and 'thin'.

Measure of consumer demand and smoking behaviour

Plain standardised packs could reduce consumer demand and promote smoking cessation among existing smokers. Exposure to plain standardised packs reduced urge and motivation to smoke when compared to branded cigarette packs.

Post implementation: the impact of plain packaging regulations in Australia

Australia introduced standardised packaging in December 2012 and three papers were considered. While it was too early to be able to measure the impact on youth initiation, one study found an increase in the number of calls to the Quitline, an effective means of smoking cessation support.

Plain pack colour

Non-white, dark and drab colours were found to be most effective in reducing appeal. Dark colours were also more effective in minimising misconceptions that some cigarettes were safer than others.

Additional evidence since 2012

The Hammond review included studies published before and after 2012. We conducted a separate search of published peer reviewed literature from 2012 onwards. The new evidence we identified is summarised below. We have also cited some studies that were included in the Hammond review, but from which we want to draw out findings that were not captured in the review summaries.

We have considered 19 studies. Online databases were searched for published peer reviewed studies using the terms 'Stand\$ Pack\$' and 'Plain Pack\$'. The search was limited to all studies published between 2012 and 2014. All relevant studies where

reviewed individually and considered for inclusion. To avoid repetition, where the main findings from a study were found to duplicate another, one from the two was included. The findings are summarised below, grouped under key impacts from standardised packaging.

Standardised packaging increases the effectiveness of health warnings

A UK study of 26 young people aged between 14 and 19 consisting of smokers and non-smokers used eye tracking technology to assess visual attention to health warnings. The study compared visual attention between branded and plain packs and produced statistically significant findings. The authors concluded that plain packs increased visual attention to health warnings when compared to branded packs.⁸

A Canadian study of 220 university students aged 19 and older consisting of smokers and non-smokers assessed effectiveness of health warnings with four different pack designs. Results found that participants were more likely to recognise health warnings and were able to recall warnings with greater accuracy from plain packs. The author concluded that health warnings were more effective on plain packs than branded packs.⁹

Tobacco branding fosters misconceptions about relative health risks: standardised packaging would tackle this

A European cross sectional survey of 4,956 adults explored differences in perception of cigarette packs and interpretations of health risks. The authors found misconceptions, that some cigarettes were safer than others, were widely held. Packet design served to reinforce perceptions of 'lighter' and 'heavier' cigarettes. Through brand differentiation of cigarettes, around a 25% of smokers believed that their brand of cigarettes were safer than others.¹⁰

A study analysed internal tobacco industry research documents relating to cigarette packaging shapes, sizes and openings. The study included 66 documents spanning 30 years of research. The authors concluded that design and packaging could influence brand appeal and reinforce misconceptions of reduced risks between different brands of cigarettes.¹¹

Tobacco branding is a powerful marketing tool

A UK study published in 2013 examined the evolution of cigarette packaging in a broader context of tobacco advertising in the period between 1950 and 2003. The authors concluded that the branded cigarette packaging served as a mobile marketing tool for cigarette advertising and when on display presented an offer to existing adult consumers.¹²

A mixed methods study in India of 346 participants including adults and adolescents examined perceptions of cigarette and smokeless tobacco packaging. Participants believed colourful tobacco packaging was a method of luring people from all socio economic backgrounds into consuming them. Over 80% reported that plain packaging would reduce the attractiveness and appeal of tobacco products.¹³

Standardised packs are less appealing to young people

A UK survey of 762 young people aged between 11 and 17 measured perceptions between various presentations of cigarette packaging. The study used quantitative methods and produced statistically significant results. The authors concluded that standardised packs, when combined with prominent messages of negative health consequences, were effective in reducing appeal to young people.¹⁴

A UK study surveyed 947 females aged between 16 and 19. The study randomised participants and grouped them into four categories depending on the variation of packs they were judging. Cigarettes in plain standardised packs were associated with fewer misconceptions of negative health consequences and perceived to taste worse. Another significant finding was that participants were less likely to accept a cigarette in a plain pack from a friend.¹⁵

A qualitative study in New Zealand explored perceptions of plain and branded packaging with 80 young people aged 14 to 15. The study concluded that participants were highly attuned to the nuances of cigarette branding and graphic warning labels. The removal of cigarette branding and the inclusion of graphic warnings was viewed to be an effective measure in reducing appeal to young people.¹⁶

A Norwegian study of 1,010 participants aged between 15 and 22 assessed differences in perceptions between plain and branded cigarette packs. The study measured outcomes relating to appeal, taste and perceived risk. Plain packs were rated less positively on appeal, taste and harm. The authors concluded that a switch from branded packs to plain could lead to a reduction of positive perceptions towards cigarettes among young people.¹⁷

Standardised packs are less appealing to adult smokers and non smokers

A study in Australia with 1,203 adult smokers assessed the effects of tobacco brand appeal and large pictorial health warnings with branded and plain packs. The study produced several statistically significant findings. Plain packs received lower ratings for positive smoker perception, taste and pack characteristics. The authors concluded that prominent health warnings, when used in conjunction with plain packaging, had greater impact in reducing appeal of cigarettes.¹⁸

An Australian study examined the effect of various presentations of cigarette packs among 354 socioeconomically disadvantaged adult smokers. The study produced

statistically significant results and found that plain standardised packs with health warnings reduced positive associations of brand image and decreased purchase intentions.¹⁹

A cross sectional study in New Zealand of 1,035 smokers and non-smokers aged between 18 and 30 analysed views regarding branding and packaging of cigarettes. Participants viewed plain standardised packs as less desirable. The findings from the study suggested that reduced brand appeal was not just limited to smokers but included non-smokers as well.²⁰

Opponents of standardised packaging argue that it would make production of counterfeit tobacco products easier, lower costs for consumers, confuse consumers in respect of product authenticity, and increase appeal and purchase of counterfeit tobacco. A Scottish study of 49 young women smokers aged between 16 and 24 explored the role of standardised packs in the context of the last of these contentions. Participants were presented with varying mock displays of legal and counterfeit tobacco in plain standardised packs. Perceptions towards counterfeit cigarettes were negative with concerns about content and taste. The authors concluded that standardised packaging had no bearing on perceived appeal of counterfeit tobacco.²¹

Standardised packaging encourages smokers to reduce their smoking and to quit

A Scottish study of 187 adult women smokers aged between 18 and 35 used a naturalistic method to provide insights into behaviour change with different types of cigarette packs. Participants smoked cigarettes from branded packs for one week and plain standard packs for the following week. The study made several statistically significant findings. When smoking from plain standardised packs, smokers reported heightened negative feelings towards smoking, looking more closely at the warning on the packet, concealment of the packet from others and a reduction in the number of cigarettes smoked in the presence of others.²²

An Australian cross sectional study of 536 adult smokers compared differences in smoking characteristics between smokers smoking from standard plain and branded cigarette packets. The survey measured a broad range of outcomes and those smoking from plain standardised packs reported perceived lower quality of cigarettes, less satisfaction from smoking and were more likely to have contemplated a quit attempt.²³

A naturalistic study conducted in France with 133 adult smokers analysed the effect of plain standardised packaging and hand rolled tobacco. Participants were designated with plain packs for hand rolled tobacco and asked to use them for ten days. Perceptions relating to brand, risk and use in front of others were then measured. When contained in plain standardised packs, smokers of hand rolled tobacco reported less positive feelings about smoking and display of the pack in front of others. Participants

also reported that they were more likely to reduce consumption and increase quit attempts.²⁴

Early post-implementation evidence from Australia shows impacts on smoking behaviour

An Australian study measured the number of calls to a smoking cessation helpline called Quitline. The study took into account pre plain pack introduction data and assessed long term trends. The study also took into account seasonal spikes and other potential influences that may have influenced calls to the Quitline, such as changes in cigarette cost. After adjusting for these confounders, the study made several statistically significant findings associated with the introduction of plain standardised packs. The most significant change was a sustained increase in the number of calls to Quitline with a 78% increase in calls, the peak of which occurred four weeks after the introduction of plain standardised packs.²⁵

An observational study in Australia examined changes in personal pack display and smoking behaviours pre and post introduction of plain standardised packs. The study observed a 15% decline in personal tobacco display. Pack orientation changed with smokers preferring to conceal the pack or place it face down post introduction of standardised packs. There was also a reduced preparedness to smoke in public. The authors concluded that reduced pack exposure as well reduced instances of smoking would serve to have positive public health gains particularly for young people.²⁶

Question 3: Do you have any comments on the draft regulations, including anything you want to draw to our attention on the practicalities of implementing the regulations, as drafted?

Slim and super-slim cigarettes

From the introduction of Virginia Slims through to modern day equivalent brands such as Vogue, we have seen the tobacco industry attempt to give to cigarettes a more 'elegant' appearance, to increase their appeal.²⁷ The legislation in Australia has standardised packet size, effectively removing the opportunity for the tobacco industry to market these slim and super-slim cigarettes. The tobacco industry uses such mechanisms to reinforce misconceptions of reduced risks between different brands of cigarettes, or to enhance the appeal of different cigarettes to different segments of the market. The regulations as drafted would not remove the opportunity for tobacco manufacturers to make this distinction.

Exclusion of cigars, pipes and other non-cigarette covered tobacco products

We agree that any increase in popularity of these products among young people would necessitate changes in regulation to prevent further uptake and harm. If it would speed up the process of making necessary changes, we would support the inclusion in the

current regulations of the level of prevalence that would trigger any change in legislation, plus the requisite powers to make the change.

Question 4: Are you aware of any further evidence or information which would improve the assumptions or estimates we have made in the consultation-stage impact assessment?

Recent data released by the Australian Treasury indicates that tobacco sales fell by 3.4% in the first year of standardised packaging.³ By modelling the effect of this percentage fall on the English market, Public Health England has calculated a total net financial saving to communities across the country of over £500 million,²⁸ with the benefit concentrated in areas of higher social deprivation.

So, for instance, according to this illustration smokers in London would save a total of £61.3 million, in Birmingham £9.2 million, in Hull £4.4 million and in Plymouth £3.3 million. Given that only around 7-9% of the value of tobacco sales is retained by the retailer, with the rest going straight to tobacco manufacturers and the Exchequer, most of the money saved by smokers would be retained in the local economy.

Conclusions

Smoking is one of the nation's most serious public health challenges, with the greatest harm suffered by the least advantaged in society. The evidence for standardised packaging as an effective measure to help drive down smoking rates is already strong, and is growing even stronger now that the positive impact is beginning to be seen in Australia.

The evidence tells us that, as part of a comprehensive programme of tobacco control, standardised packaging has the power to bring significant improvements in public health. The latest data from Australia indicates that it could also bring real economic benefit to our most deprived communities.

The evidence for the benefits standardised packaging can deliver is now irrefutable. To delay its introduction is to delay our attainment of those benefits. We want to build on the progress already made in driving down rates of youth smoking. Removal of tobacco companies' ability to engage young people through marketing, improved knowledge of the health harms and fewer smoking role models are all essential to achieving a tobacco free generation. As a powerful addition to the existing levers at our disposal, standardised packaging could be the game changer.

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