Rightsizing the Tobacco

Warning on Tobacco Products – Capacity Building within Legislative Framework

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**Acronyms**

**WHO:** World Health Organization.

**FCTC:** Framework Convention on Tobacco Control.

**MPOWER:** (Six components of WHO measures complementing FCTC) Monitor tobacco use and prevention policies, Protect people from tobacco smoke, Offer help to quit tobacco use, Warn about the dangers of tobacco, Enforce bans on tobacco advertising, promotion and sponsorship, Raise taxes on tobacco.

**TCC** Tobacco Control Cell.

**MoNHSR&C** Ministry of National Health Services Regulation and Coordination.
Overview

The scientific linkage between the tobacco use in any form, and its ill-effects on health is available in abundance. The process of enacting and up-dating tobacco control regulations started around the world ever since the empirical evidence became available on the health hazards of tobacco use. The studies proved a direct linkage between the tobacco use and lungs diseases, cancer and many other health hazards (Mendes, 2014).

World Health Organization (WHO) has been working for decades to promote awareness against the use of tobacco among smokers and non-smokers, and to convince states around the world to adopt measures favouring protection of health. Measures such as World No Tobacco Day and multiple thematic campaigns have been the hallmark of tobacco control work. One of the major achievements was the adoption of Framework Convention on Tobacco Control (FCTC) during 56th World Health Assembly held in Geneva, Switzerland on 21 May 2003 and entered into force on 27 Feb 2005. Presently there are 168 countries as signatories and 181 parties to the convention (WHO, 2017).

Pakistan has always been proactive in tobacco control measures and a year before the Convention, Pakistan had multiple robust tobacco control laws in place in the shape of Prohibition of Smoking in Enclosed Places and Protection of Non-Smokers Health Ordinance, 2002 (Ordinance No. LXXIC of 2002) (GoP, 2002). Going further back in history of the tobacco control and regulation, Pakistan has been putting the tobacco control laws in place since 1950s. One of the significant and milestone steps taken by the government of Pakistan was the promulgation of Ordinance No. LXXIII of 1979, Cigarettes (Printing of Warning) Ordinance, 1979 (GoP, 1979). Keeping the 1979 Ordinance and its updated versions in focus, this brief aims at looking at the problems, global and regional good practices, and related dimensions of the package warning and recommending way forward for Pakistan.

Sustainable Development Policy Institute (SDPI), through Bloomberg tobacco control initiative and in collaboration with The Union is conducting the project focusing on the WARNING aspect of the tobacco packing, both for combustible and non-combustible (also known as smoking and smokeless) tobacco products. This policy brief aspires to highlight the significance of the WARNING on the tobacco products and makes policy recommendations for the future of the WARNING in Pakistan. These recommendations will be shared with the policy makers as a matter of technical support from SDPI, for development and strengthening of comprehensive and multi-sectoral laws in Pakistani tobacco control regime.

Definitions/Key Words

Few of the important and relevant terms defined by the FCTC and FCTC Guideline (David Hammond, 2009; WHO, 2005, 2008) are as under:-

1. Tobacco/Tobacco Product. Any product entirely or partly made of the leaf tobacco as a raw material which is manufactured to be used for smoking, sucking, chewing, or snuffing.
2. Tobacco Control. A range of supply, demand and harm reduction strategies aimed at improving the health of a population by eliminating or reducing the consumption of the tobacco products and exposure to tobacco smoke.
3. Legal Measures. It means any legal instrument that contains or establishes obligations, requirements or prohibitions, according to the law of the relevant jurisdiction. Examples of such instruments include, but are not limited to acts, laws, regulations and administrative or executive orders.
Significance of the WARNING on Tobacco Products – Literature Review

Graphic Health Warning (GHW) is the most common method of informing the consumers regarding the risks involved in use of tobacco. A pack of cigarettes itself acts as the biggest and mobile advertising tool in favour of tobacco industry. There is thus a need to disrupt this excessive social visibility through effective measures, and one of the best and cost effective to do that is GHW. Multiple studies and researches have been conducted around the globe to augment the reasons for placing GHW on the packing, its size and location on the pack, contents of the warning and need for textual and pictorial warning. Incidentally, Pakistan has been one of the earliest advocate of placing such warnings and Ordinance No. LXXIII of 1979, Cigarettes (Printing of Warning) Ordinance, 1979 (GoP, 1979) is a testimony to this.

One of the most significant purposes of the GHW is to inform the consumers, however, as argued by D Hammond, Fong, McNeill, Borland, and Cummings (2006), despite presence of GHW on cigarette packs in some of the major developed countries, it fails to fully achieve that purpose and smokers are not fully informed about the contents or the health risks involved in smoking. The size and placing of the GHW also has an impact on getting noticed. For example David Hammond et al. (2007) argue that large GHW is more likely to be noticed by the smokers and frequent rotation and replacement of pictorial and textual warning increases the effectiveness of the warning component. The research on GHW got further strengthened by substantiating the need for placing both pictorial as well as textual warning on the packing instead of textual warning alone (O’Hegarty et al., 2006).

As a result of many empirical studies, now comprehensive guidelines exist for the manufacturers, employers and end users to understand and also measure the effectiveness of GHW (Wogalter, Conzola, & Smith-Jackson, 2002). Multiple researches have cited adoption of varying methodologies to understand the social and psychological impact of GHW and the literature continues to grow (Strahan et al., 2002).

Multiple researches cover a variety of GHW aspects such as color, textual and pictorial message, size, placing/location of warning on the pack, regular rotation, appropriacy of the content targeting a particular age/gender or segment of society and noticeability etc. Placing warning pictures and textual messages on the packing has a disruptive power, targeting a particular age group (for example youth and children in case of Pakistan) through such messages increases the validity and effectiveness of these messages (Devlin, Anderson, Hastings, & Macfadyen, 2005). Plain packaging has also been introduced in many developed countries, which means packaging with no logo, color or text except the brand name. Goldberg, Liefeld, Madill, and Vredenburg (1999) argue that smokers are likely to pay more attention to the GHW if plain packing was adopted.

WHO (2013) claims that the presence of both textual and pictorial warning on the packing is more likely to
be noticed, has been rated more effective by the users, is likely to remain salient over time, can effectively communicate the health risks, can lead to thinking and attempts to quit smoking. To sum it up, there is a large volume of literature and empirical studies to support the presence, placing and size of the GHW and FCTC member nations are constantly augmenting their efforts to control the spread of tobacco pandemic through GHW as one of the significant measures.

**FCTC Article 11 and Guideline**

In line with the Article 4 of FCTC, each person is to be informed regarding the harmful effects of tobacco usage (WHO, 2013). Article 11 of the FCTC deals with the GHW on the cigarette packing and the member nations were asked to implement the presence of this component on the packs within five years of the treaty coming to force. Arguing in favour or large and prominent GHW on the packing, FCTC posits that such warnings are not only likely to be noticed by the consumers, but are also likely to remain in the memory for a long time. This also reiterates the need to rotate the warning on regular basis. Some of the desirable design elements spelled out in Article 11 of the FCTC include:

1. Article 11.1(b)(iii) obligates all parties to adopt and implement GHW (both textual and pictorial) to be clear, visible, legible, on top rather than towards the lower side of the packs and opening of the packing should not hide or distort the warning component.
2. The warning needs to remain clear from other printing or obstructing measures such as placing of the tax stamps, commercial inserts/onserts etc.
3. As per the Article 11.1(b)(iv) the size of the warning should not be less than 30% of the entire pack and should be 50% or more.
4. Similarly Article 11.1(b)(v) emphasizes the need to add pictures to the warning component. This step is instrumental in fulfilling the real purpose of GHW for the illiterate smokers or those who cannot read the warning in multiple languages, for example on imported cigarettes.
5. Due to enhanced noticeability the warning (both pictorial and textual) needs to be in colored as compared to the black and white.
6. Another significant aspect of GHW is regular rotation which is covered under Article 11.1(b)(ii) of the FCTC. It obligates the parties to enforce multiple warning simultaneously or by setting a date for rotation.
7. The textual warning needs to focus on multiple health risks caused by tobacco use, rather than using a generic ‘health warning’ message. It could possibly include advice on cessation, highlight the addictive nature of the tobacco, show the economic and social cost of using tobacco products, passive smoking causing health problems to non-tobacco users and environmental damage by tobacco etc.
8. Personal, social and cultural relevance and appropriacy of GHW also increases its effectiveness, therefore when regulating tobacco control such messages need to be carefully chosen and simple replication from another country or region may not yield the desired effects.
9. Article 11.3 necessitates the parties to make innovative and appropriate use of the language when regulating the GHW. The messages could be in multiple languages or regional languages could best be used for communicating with the consumers from a specific region.
10. Article 11.2 requires the inclusion of the information regarding the package constituents. Desirably, such statements should clearly state the ill-effects of the tobacco use, for example, ‘Smoking exposes you to 60 cancer causing chemicals’ (WHO, 2008).
Despite vested interests of tobacco industry, pressure from the local and international manufacturers, regional and national partisan political issues, Pakistan has made significant progress in promulgating tobacco control laws, albeit with much left to be desired in implementation (Naqvi, 2019). One of the latest issues experiencing intense tobacco industrial global and national level resistance relates to the WARNING on the cigarette packs, for which the case is pending before the Islamabad High Court. Besides this there are multiple gaps in existing legislative process which need to be addressed.

1. **Tobacco Absent by Definition.** Ironically, despite multitude of existing laws, ‘tobacco’ has not been defined in any regulations of government policy documents. The only definition that exists for tobacco is a botanical definition as it appears in Tobacco Board Ordinance of 1968 as ‘commodity which is made from the leaves of the plant “nicotiana tobaccum” or “nicotiana rustica” and is commonly known as tobacco and includes adjacent tender stalks or green tobacco but does not include tobacco waste’. This definition is not suitable nor advised by the WHO Framework Convention on Tobacco Control (FCTC). Article 1(f) of The Convention defines tobacco as ‘any product entirely or partly made of the leaf tobacco as a raw material which is manufactured to be used for smoking, sucking, chewing, or snuffing’. As a result of this neglect the word tobacco is absent from most of the laws/SROs, and more alarmingly smokeless tobacco gets excluded by definition from the policy, blurring the difference between the ‘non-smokers’ and ‘non-tobacco users’.

2. **Rotation and Placement of the WARNING:** Sluggishness in rotating the images as GHW also makes the smokers effect immune. Studies have shown that an average individual is exposed to the warning almost 7000 times per year (D. Hammond, Fong, McDonald, Cameron, & Brown, 2003). Such excessive exposure can be effective if the pictorial and textual warnings are changed frequently. In Pakistan, law demands the warning to be rotated every 24 months, however the current GHW on cigarettes produced in Pakistan, was recently changed after almost six years. Adding to the problems with the GHW in Pakistan, the country is not in compliance of the FCTC guideline stating that warnings or messages may not be placed where they may be permanently damaged or concealed when opening the pack. Additionally, most of the imported/smuggled cigarettes do not have any GHW component and are being sold with impunity. Placing of the GHW on the cigarette pack lid, effectively hides the picture thereby reducing the desired impact.

3. **Misguidance instead of Advice.** The laws are also absent on concerning the misleading tobacco product packaging and labelling including terms, descriptors, trademarks, or figurative or other signs, for example logos, colours, brand images that directly create a false impression that a tobacco product is less harmful than other tobacco products such as ‘light’, ‘ultralight’ or ‘menthol etc. This issue necessitates the inclusion of plain packaging in the tobacco control regime. However, separate studies are needed to adopt this option and elaborate policy planning process is needed as a precursor for such a move. Relatedly, another grey area in the tobacco control regime is the absence of laws concerning advice on cessation, benefits of cessation or steps needed for smoking cessions, highlighting the addictive nature of tobacco, adverse economic and social outcomes, impact of tobacco use on friends and family, and a quit-line phone number. All these problems are more pronounced in the absence of scientific and well researched evidence.

4. **Smokeless Tobacco.** No laws exist catering for the warning on smokeless tobacco, and absence of standardization in these products makes their regulation, and understanding the enormity of the products, challenging. “Smokeless Tobacco” is a recognized term used by the WHO, and therefore needs attention and legislation. The laws are absent mostly for the reasons of lack of credible research data, involvement of irregular/informal economy,
cultural and social attachment to some of the smokeless products (for example Naswar), lack of incentive to the farmers and lack of interest by the policy makers. However, with an increasing need to highlight the gaps in tobacco control regime, smokeless tobacco industry is likely to respond with social and cultural argument and resist any control measures. One of the laws permits smokeless tobacco to be sold by the minors because ‘sale’ is different than the ‘use’ (Khan, 2016). The situation gets further deteriorated due to the unregulated and smuggled products (for example Gutka and Paan Parag etc.) from neighbouring countries such as India. All these products do not have any GHW component and mostly fall in untaxed and illicit economic zone. The absence of standardization in smokeless products renders any additional control measures irrelevant.

5. **Juul, Electronic and Heat-not-Burn Devices (Vaping).** One of the latest developments in the tobacco industry is Vaping which has been promoted as a safe alternate to smoking using e-cigarettes, Juul and Heat-not-Burn devices. Such products use metal to heat the cartridge contained liquid to create vapour. Presence of heavy metals such as cadmium and arsenic are already creating more nuanced pictures of potential hazards of vaping and are in focus of serious legislation in many countries. In 2010, vaping revenues in the U.S. alone were estimated at $416 million. By 2015, that number had soared to $3.2 billion. Market projections estimate that the global e-cigarette market will be worth upward of $44 billion by 2024 (Arnold, 2018). In the foreseeable future these products are likely to make their way to the LMICs including Pakistan. There is a need for preemptive policy planning and have the requisite legislation in place including all control measures including GHW on these products. Generally the tobacco industry outwits the policy processes and the delaying tactics further prolongs the legislative implementation process.

6. **Regulatory shortfall.** Tobacco control regulation in Pakistan have been reactionary and sometimes impulsive in nature, instead of being proactive, comprehensive and forward looking. A recent example of such reactionary nature has been the introduction of ‘sin tax’ on tobacco which drew criticism from many quarters (Junaidi, 2018). A more relevant example of such impulsive policies has been the SROs 22(KE)/2015 and 23(KE)/2015, which were originally issued to increase the size of the health warnings from 40% to 85%, both on the front and back of cigarette packages. Additionally, these SROs prescribed rules regarding the rotation, manner, look, and design of the single health warning. These SROs were fiercely resisted by the tobacco industry and finally repealed in 2017. There is immense tobacco industrial pressure on ministries of finance and commerce. They have been pressurizing multiple state institutions to avoid tobacco control policies.

**Global and Regional Best Practices in GHW**

A regional comparative table below shows the existence of laws related to the Article 11.

<table>
<thead>
<tr>
<th>Description</th>
<th>Pakistan</th>
<th>India</th>
<th>Nepal</th>
<th>Bangladesh</th>
<th>Sri Lanka</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Combustible/Smoke Tobacco Products</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Type of Warning/Message Required</td>
<td>Pictures (Photo), Text Warning, Messages</td>
<td>Pictures (Photos), Text Warning, Messages</td>
<td>Pictures (Photos), Text Warning, Messages</td>
<td>Pictures (Photos), Text Warning, Messages</td>
<td>Pictures (Photos), Text Warning, Messages</td>
</tr>
<tr>
<td>Location and Size of Warning/Messages on Unit Packaging</td>
<td>10% of front, 50% of back</td>
<td>10% of total, 50% of back</td>
<td>10% of total, 50% of back</td>
<td>10% of total, 50% of back</td>
<td>10% of total, 50% of back</td>
</tr>
<tr>
<td>Size of Warning/Messages is authorized to be displayed at any given time</td>
<td>Uncertain</td>
<td>Uncertain</td>
<td>Uncertain</td>
<td>Uncertain</td>
<td>Uncertain</td>
</tr>
</tbody>
</table>

**Figure 1:** Comparative Analysis Combustible/Smoke Products (CTFK, 2019b)

Figure 1 above shows a comparative analysis of GHW on smoked/combustible tobacco products. This regional analysis shows Pakistan needs to do a lot more in the GHW domain. For example smaller neighbors such as Nepal and Sri Lanka have 80% and 90% GHW respectively, covering the tobacco pack, whereas in Pakistan the size of the GHW will increase to 60%. A randomized analysis reveals that, for example, Australia has 7 Ireland has 14 GHW messages and pictures authorized to be displayed at any given time, Pakistan has just one (CTFK, 2019b). To
provide multiple thematic options to the FCTC member nations, a comprehensive database exists (WHO, 2019), and countries are encouraged to utilize these messages and images through tobacco industry.

Figure 3: Comparative Analysis – Smokeless Products (CTFK, 2019b)

Figure 2 above shows the dire state of the smokeless tobacco legislation in Pakistan. More specifically there are no laws covering the GHW aspect on the smokeless tobacco. As mentioned above, the dilemma of smokeless tobacco, being part of cultural and social commodity, makes it harder to promulgate any reasonable laws. The first step in this regard needs to be the standardization of the products, coupled with stringent import laws on products such as Gutka and Paan Parag etc. There is also a need to understand the role of shadow economy in fostering and sometimes promoting on the uncontrolled production, transportation and sale of smokeless products such as Naswar. Some studies have been conducted to know the health damages of the tobacco in smokeless form (Khan, 2016; Siddiqi et al., 2015), however further research and concerted efforts are needed to regularize and control the pandemic of the smokeless tobacco.

Policy Recommendations for Pakistan

Keeping in view the current state of implementation and industrial efforts to outwit the legislative process, there is a need for a multi-sectoral comprehensive policy which should be forward leaning. There are multiple laws covering aspects of FCTC, however, some of these laws have been bypassed/out manoeuvred by the tobacco industry, while few other laws were reactionary and impulsive in nature, making their implementation difficult. Moreover the implementation itself is an area which needs more emphasis and stringent regulation. In this regard few of the policy recommendations are being offered, some of which have been shared in the policy circles, while others will be communicated in joint and one-on-one technical support sessions offered to the policy makers by SDPI.

1. Although multiple SROs have been issued by the government of Pakistan obligating tobacco industry covering GHW issues such as placing of the warning messages, color, and text size and font, unfortunately very few options have been used on the issue of rotation. As mentioned in this brief, there is an empirical evidence available on the purpose and desirability of rotating the pictures and messages. Additionally, FCTC, Guideline to FCTC and multiple other data sources give a whole range of pictorial as well as textual options targeting making it easier for countries to develop their own rotation laws (TLRC, 2013; WHO, 2019). Pakistan needs to adopt several options and ensure rotation every year if not earlier as desired by the SRO 1219(I)/2008. This SRO gives a range of textual options and desires the rotation for these messages to take place every six months. However, in case of pictorial warnings a more practical option could be 12 months.

2. Stringent and multi-layered punitive measures against the vendors, wholesalers and the manufacturers are necessary. Currently there is a standard fine/punishment for any violations, including manufacturer, wholesaler, importer and vendor (CTFK, 2019a). Violations are punishable by fines up to Rs. 10,000, imprisonment up to two years or both. Other penalties include seizure of the product. This serious anomaly needs to be addressed in line with the FCTC Article 11 and FCTC Guidelines. The suggested punitive actions need to provide for range
of penalties, varying between the type and size of business. A fine for Rs. 10,000 has very little impact on a manufacturer, however, it is a lot of money for a street corner vendor. Revocation of license and incremental fines/punishments for larger and repeat offenders need to be part of the punitive process in tobacco control regime. The real deterrence needs to be visible and implemented for reduction in illicit trade and prevention of violations.

3. Multiple studies have proposed the need to control and eliminate illicit trade. Besides bringing variety of unmonitored products in the market with increasing health problems, illicit trade also causes burden on national exchequer due to non-tax paid products in the market.

4. Smokeless tobacco has also been neglected due to main emphasis towards the combustible/smoked tobacco products. Resultantly no control is exercised on production, transportation, marketing, sales and consumption. Unfortunately, unlike smoked tobacco products, smokeless products can be handled and sold by the minors. Absence of any worthwhile warning on the product itself tends to equate it to any other edible product and the health hazards are completely ignored.

5. Smokeless tobacco use is certainly an under-researched area of serious concern. In some regions of Pakistan, due to a social and cultural attachment to smokeless products such as Naswar (in KPK and Punjab), and Gutka or Paan Parag (in Karachi), promulgation of meaningful legislation in controlling smokeless tobacco becomes a taboo. Therefore the entire economy of smokeless products is unregulated. Addition of non-standardization in packing and absence of any health warning makes the smokeless tobacco a serious health hazard. There is a need to systematically bring this under the tobacco control regime. As a first step, the emphasis should be on standardization of the products to ensure that these are in similar packing. Subsequently, these products must be required to print GHW (in shape of inserts of onserts) and taxation and Track & Trace should be ensured at later stages.

6. Government of Pakistan has been planning to obligate the tobacco industry to place tax stamps on each pack. A separate study is needed to ensure that the Track & Trace in tobacco control regime is implemented. The implementation would mean placing the tax stamps on the packing, to which tobacco industry is likely to adopt one of the two possibilities: 1) resist placing the tobacco stamp completely as the area required for placing tax stamp would further reduce the product/marketing visibility; 2) tobacco industry could also use the 60% GHW space (Starting June 2019), and place tax stamps on top of the GHW to keep the marketing space uncompromised. Tobacco control regime in Pakistan needs to keep a watchful eye on the package labelling as the tax stamps materialize.

7. Enforcement Complaint Line for reporting the violations is urgently needed. Such a line could be established at TCC at the Ministry of National Health Services Regulation and Coordination (MoNHSR&C). This line needs to have cell phone connection as well, which will be helpful in sharing the pictorial proof of any violations observed by the citizens. Along with this, there is a need to enforce the existing laws through extensive crackdown at national level. The process of such crackdowns has just started (Junaidi, 2019). It is recommended that such measures should be expanded through media and social media campaigns and enforcement mechanism should be made assertive.

8. The future actions of the tobacco industry and smuggling/arrival of unregulated products needs serious consideration. The policy needs to include Track & Tax measures for vaping products such as Juul and Heat-no-Burn. This will discourage the import of this latest health hazard and help control regime to understand the enormity of problems caused by these products.
**Conclusion**

To control the wide spread menace of tobacco use, there is ample literature and studies conducted all across the world. The literature supports, presence and size of graphic health warning. Pakistan has made significant efforts in promulgating tobacco control laws despite the fact that they had to sustain pressure from the local and international manufacturers, regional and national partisan political issues. There is much left to be desired in implementation, and one of the major challenges is the implementation and rightsizing of graphic health warning on cigarette packs. There are multiple gaps in existing legislative process and the case for rightsizing the GHW is still pending before the Islamabad high court.

The analysis of the tobacco control regime in Pakistan shows multiple gaps in legislative process which need to be addressed on priority. For example, the very definition of “tobacco” is missing from the government policy documents, and the only existing definition is a botanical definition appearing in tobacco board ordinance of 1968. The implementation of GHW rotation and placement of the warning also remains sluggish. In Pakistan, law demands that the warning needs to be changed after every 24 months; however the current warning was changed after 06 years which shows that the country is not compliant with the FCTC rules. The categorization of labelling on the cigarette packs, just like rest of the world misleading instead of advice, the cigarette pack show the “light” and “ultra-light” categories, giving an impression of lesser harm for the smokers.

Similarly no law exists catering for the warning on smokeless tobacco. There is an absence of standardization in smokeless tobacco such as ‘Naswar’ and other similar products.

There is also a regulatory shortfall and tobacco control regulations are reactionary instead of being proactive and forward looking. One recent example is the idea of ‘sin tax’ which drew a lot of criticism against the government. If measures recommended in this paper are considered for legislation, the country can soon be FCTC compliant in many more areas, compared to the current situation. Measures such as variable punitive actions the whole-sellers, vendors and manufacturers, crack down on illicit trade and regulation of undocumented economy of smokeless and smuggled tobacco, would go a long way in strengthening the tobacco control regime. There is an urgent need to implement the track and trace system so that tobacco tax evasion could be controlled. Enforcement complaint line for reporting the violations is the need of the hour. Prime Minister’s complaint portal may also be beneficial in this context. Pakistan’s customs department has an important role to play by regularizing the smuggled and unregulated tobacco products.
References

• WHO. (2013). Guidelines for Implementation Article 5.3; Article 8; Articles 9 and 10; Article 11; Article 12; Article 13; Article 14 Retrieved Apr 11, 2019, from www.who.int