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 World Health Organization, these are the measures complementing Framework Convention on Tobacco Control). M refers to Monitoring the tobacco use and prevention policies pertaining to the tobacco usage, P is to ‘Protect’ the people from harmful tobacco smoke. Similarly, O refers to ‘Offering’ the help to quit smoking, Warning about the harmful dangers of the tobacco use is the next component. ‘E’ has been catered to ‘Enforce’ the ban on the tobacco advertising, including promotion and sponsorship of events etc. and finally ‘R’ refers to ‘Raising’ the taxes on all tobacco products.

TCC: Tobacco Control Cell
MoNHSR&C: Ministry of National Health Services, Regulations and Coordination
Overview

Medical literature is replete with the scientific evidence linking the tobacco use in any form, and its ill-effects on health. The process of enacting and up-dating tobacco control regulations was initiated around the globe ever since the empirical and scientific 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 since 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. Many thematic campaigns, including ‘World No Tobacco Day’ have been the hallmark of tobacco control work over the years. The major achievement of the present time was the adoption of the Framework Convention on Tobacco Control (FCTC) during the 56th Geneva session held by World Health Assembly. During this session, the preposition was presented on 21 May 2003, while the Framework Convention was enforced on 27 February 2005. Currently, there are 168 signatory countries totalling up to 181, including all parties to the convention (WHO, 2017).

Pakistan has always been proactive in tobacco control measures. A year before the Convention, Pakistan had multiple robust tobacco control laws in place in the shape of Prohibition of Smoking in closed Places and Protection of Non-smokers Health Ordinance (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 initiatives 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 best 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 (a global scientific forum working in 150 countries to improve the health of the poor), is conducting the study 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. In an effort to strengthening the need for a multi-sectoral and comprehensive tobacco control regime and policies in Pakistan, the recommendations will be shared with the policy makers and legislative framework.

Definitions/Keywords

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

a. **Tobacco/Tobacco Product**: Tobacco refers to any product that is wholly or 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.

b. **Tobacco Control**: Tobacco control refers to the number of strategies taken for the reduction of supply, demand and harm related to tobacco. It also aimed to improve the health of a population by eliminating or reducing the consumption of tobacco and exposure to second-hand smoke.

c. **Legal Measures**: Legal measures are obligations or prohibition according to the law. Examples of instruments of legal measures include, but are not limited to laws, regulations and administrative or executive commands.

d. **Insert**: An insert refers to any pictorial or written communication inside an individual package and/or carton purchased by consumers, such as miniature leaflets, brochures, etc.
e. **Onsert:** It refers to any written or pictorial communication affixed to the outside of an individual package and/or carton brought by the consumers, such as a brochure attached to the outside of the cigarette package.

f. **Tobacco Industry:** Like other industries tobacco industry includes its manufacturers, wholesale distributors, and importers.

g. **Illicit Trade:** Any practice or conduct, which relates to production, shipment, receipt, ownership, distribution, sale or purchase of any product that is prohibited by law is known as illicit trade. It also involves any practice intended to facilitate such illegal activity.

**Significance of the WARNING on Tobacco Products – Literature Review**

Graphic Health Warning (GHW) is the most common and widely prevalent method of informing the consumers regarding the risks involved in the 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 methods is GHW. Multiple studies and researches have been conducted around the globe to argue on the issues such as 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 advocates 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 knowledge empowerment of 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 completely aware about the contents or the health risks involved in smoking. The size, colour and placing of the GHW also directly influences the visibility and noticeability. 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).

Many empirical studies make it evidently clear that progressively comprehensive guidelines have been developed and refined 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 to this effect continues to grow (Strahan et al., 2002).

As mentioned above, wide scholarship talks about the variety of GHW aspects such as colour, 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). To further reduce the attractiveness of the packing, plain packaging has also been introduced in many developed countries, which means packaging with no logo, colour or text except the brand name. Scholars such as Goldberg, Liefeld, Madill, and Vredenburg (1999) argue that smokers are probably going to give more consideration 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 effective and conspicuous, has been rated more efficacious by the consumers, is likely to remain notable over time, can effectively impart the health risks, and can lead to increased urge 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 remedial 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:

a. 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.

b. The warning needs to remain clear from other printing or obstructing measures such as placing of the tax stamps, commercial inserts/onserts etc.

c. 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.

d. 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.

e. Due to enhanced noticeability the warning (both pictorial and textual) needs to be in coloured as compared to the black and white.

f. Another significant aspect of GHW is regular rotation which is covered under the Article 11.1(b)(ii) of the FCTC. It obligates the persons concerned to enforce multiple warning simultaneously or by setting a date for rotation.
g. 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 guidance on cessation, highlight the addictive nature of the tobacco, show the socio-economic cost of using tobacco products, passive smoking causing health problems to non-tobacco users and environmental damage by tobacco, etc.

h. 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.

i. 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.

j. 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).

**FCTC Article 11 – Analysis of Pakistani Tobacco Control Regime**

Despite vested interests of tobacco industry, local and international pressure by manufacturers, regional and national partisan political issues, Pakistan has made significant advancement 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. The court heard the arguments from the Tobacco Control Cell and ordered a report on the non-implementation of the GHW to 85% (Reporter, 2019). After the submission of the report, the judge called upon tobacco industry to deposit a rejoinder. The case is progressing in favour of the civil society. Besides, there are multiple gaps in existing legislative process, which need to be addressed.
a. **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 ‘product which is made from the leaves of the plant “nicotiana tobaccum” or “nicotiana rustica” and is commonly known as tobacco and it includes soft stalks or green tobacco but does not include tobacco waste’. WHO Framework Convention on Tobacco Control (FCTC) does not support this definition. Article 1(f) of *The Convention* defines tobacco as ‘any product completely or partly made as a raw material of the tobacco leaf which is manufactured to be utilized for smoking, sucking, chewing, or snuffing.’ Consequently, 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’.

b. **Rotation and Placement of the WARNING:** Sluggishness in rotating the images as GHW also makes the smokers effect immune. Studies show that an average individual is exposed to the warning almost seven thousand 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 obligates the warning to be rotated every 24 months, however the current GHW on cigarettes produced in Pakistan, was 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 written or pictorial messages of warning should be placed on the pack where they are permanently visible even when the pack is open. 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.
c. **Misguidance instead of Advice:** The laws are also absent on concerning the deceptive packaging and labelling of tobacco product including conditions, labels, trademarks, or pictures or other signs, for example colours, brand images that give a bogus impression that this tobacco item is less harmful than other tobacco items such as ‘light’, ‘ultralight’ or ‘menthol. This issue necessitates the inclusion of plain packaging in the tobacco control regime. However, separate studies are needed to adopt this option. Besides, an elaborated policy planning process is needed as a precursor to such a move. Relatedly, another grey area in the tobacco control regime is the absence of laws concerning guidance on cessation, benefits of cessation or steps needed for smoking cessations, highlighting the addictive nature of tobacco, its negative socio-economic outcomes, and impact of second-hand smoke of tobacco, and a quit-line contact number. All these problems are more pronounced in the absence of scientific and well-researched evidence.

d. **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 an accepted 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, Paan Parag*, etc.) from the 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.

**e. 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 electronic-cigarettes, Juul and Heat-not-Burn tobacco 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. The vaping revenues in 2010, of the United States alone were approximate at $416 million. That number has increased to $3.3 billion by 2015. According to the market forecast, the global e-cigarette market will be soared upward of approximately $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 pre-emptive policy planning as well as requisite legislation in place, including all control measures such as GHW on these products. Generally, the tobacco industry outwits the policy processes and the delaying tactics further prolongs the legislative implementation process.

**f. Regulatory shortfall:** Tobacco control regulations 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 initially given to enhance the size of health warnings from 40% to 85%, both on the front and back
of cigarette bundle. Also, these SROs set rules regarding the rotation, style, appearance, and design of the 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 Warnings/Messages Required</td>
<td>Pictures (Photos), Text Warnings/Messages</td>
<td>Pictures (Photos), Text Warnings/Messages</td>
<td>Pictures (Photos), Text Warnings/Messages</td>
<td>50% of front, 50% of back</td>
<td>80% of front, 80% of back</td>
</tr>
<tr>
<td>Location and Size of Warnings/Messages on Unit Packaging:</td>
<td>80% of front, 80% of back</td>
<td>85% of front, 85% of back</td>
<td>90% of front, 90% of back, Side(s), Other (e.g., inserts, onserts, on the tobacco product, itself)</td>
<td>50% of front, 50% of back</td>
<td>60% of front, 80% of back</td>
</tr>
<tr>
<td>No. of Warnings/Messages authorized to be displayed at any given time</td>
<td>1</td>
<td>1</td>
<td>5</td>
<td>7</td>
<td>Uncertain</td>
</tr>
</tbody>
</table>

*Figure 2: 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 neighbours 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 approved 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 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, 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 with the aim of knowing 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.

**Conclusion**

It can be concluded that related laws exist in Pakistan; the weak areas include the implementation side and the excesses by the tobacco industry. Through the efforts made by the civil society as well as Tobacco Control Cell, multiple milestones are being covered by the tobacco control regime. There is still a wide gap in a comprehensive broad based multisectoral policy that covers the tobacco control issues in a futuristic manner. For such an effort, tobacco control partners need to work in collaboration with each other and support the efforts towards the implementation of existing laws, rules and pursue governmental policies in the tobacco control domain.

<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>Non-Combustible/Smokeless Tobacco Products</td>
<td>Pictures (Photos, Text Warnings/Messages)</td>
<td>Pictures (Photos, Text Warnings/Messages)</td>
<td>Pictures (Photos, Text Warnings/Messages)</td>
<td>Pictures (Photos, Text Warnings/Messages)</td>
<td>Pictures (Photos, Text Warnings/Messages)</td>
</tr>
<tr>
<td>Type of Warnings/ Messages Required</td>
<td>Not Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>Location and Size of Warnings/Messages on Unit Packaging</td>
<td>85% of front, 85% of back</td>
<td>90% of front, 90% of back</td>
<td>90% of front, 90% of back</td>
<td>90% of front, 90% of back</td>
<td>90% of front, 90% of back</td>
</tr>
<tr>
<td>Rotation Required?</td>
<td>Not Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td>No. of Warnings/Messages authorized to be displayed at any given time</td>
<td>n/a</td>
<td>1</td>
<td>2</td>
<td>2</td>
<td>2</td>
</tr>
</tbody>
</table>
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.

a. Although multiple SROs have been issued by the government of Pakistan obligating tobacco industry covering GHW issues such as placing of the warning messages, colour, 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)/2008.¹ 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.

b. 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,

¹ This and all other SROs related to tobacco control can be viewed/downloaded at http://www.tccc.gov.pk/downloads.php
wholesaler, importer and vendor (CTFK, 2019a). Violations are punishable by fines up to Rs 10,000, imprisonment up to two years or both. And product can be seized as a penalty. This serious anomaly needs to be addressed in line with the Article 11 of FCTC and its 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.

c. 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.

d. 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.

e. 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 Khyber Pakhtunkhwa and Punjab), and Gutka or Pan 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 or onserts) and taxation and Track & Trace should be ensured at later stages.

d. 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.

g. 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.

h. 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.
References


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

