Compliance of Health Warning Labels on Smokeless Tobacco Products in India

Sejal Saraf, BDS, MPH
Kevin Welding, PhD
Katherine Clegg Smith, PhD
Joanna Cohen, PhD
Disclosures

• Funding Source: The work was supported with funding from Bloomberg Philanthropies’ Bloomberg Initiative to Reduce Tobacco Use (www.bloomberg.org)

• Industry funding to investigator in the last 5 years: None

• Off label medication uses discussed: N/A
Smokeless Tobacco in India

• The smokeless tobacco (SLT) market in India is the world’s largest

• Smokeless form: 20% vs. smoked form: 9%

• 9 types of smokeless products available in the market

• Cost of product: <1$

Photo courtesy: Indianexpress.com
Indian Packaging and Labeling Law

We know…

- Health warning label (HWL):
  - Cost-effective policy intervention
  - Excellent medium for communicating health information
- In 2009, India became the first country to implement HWLs on SLT products
- Latest COTPA requirement – 85%

2009 to 2011: Health warnings that were implemented for smokeless tobacco (‘tobacco kills’)

2011 to 2013: Graphic Health warnings for smokeless tobacco

April 2013 to April 2015: Graphic Health warnings for smokeless tobacco

April 2016: New Health warnings (required to cover 85% of the front and back of the pack)
Gaps in Knowledge

- Few studies have assessed compliance with gutka and pan masala bans in various states, and with tobacco advertising and promotion
- Compliance with packaging and labeling law has been only minimally explored
- Non-compliance with HWL best practices can result in poorer knowledge about the dangers of tobacco use, a reduction in quitting behaviors, and an increase in new tobacco users
Objective of the Study

Examine the level of compliance of health warning labels on smokeless tobacco packages with the Indian packaging and labeling law.
TPackSS Methods
Data Collection

• In 2016, data were collected in four cities: Mumbai, Bengaluru, New Delhi and Chennai

• A systematic walking protocol was developed and used to collect the data
= 54 unique smokeless tobacco packs
Coding Packs

• All 54 ‘unique’ packs were coded

• Packs were independently coded by 2 trained Research Assistants

• Packs were assessed for compliance with four key requirements:
  1. Warning location
  2. Warning size
  3. Warning elements
  4. Language
HWL Compliance: Key Indicators

1. Warning location

- Located at the top edge of the pack on both sides (diametrically opposite if pack is cylindrical)

2. Warning size

- HWL must cover 85% on both sides of the principal display area of the SLT packages
H WL Compliance: Key Indicators

3. Warning elements

- Complete full color graphic. Warning text and message in a contrasting background color

4. Language

- The warning message must be in the same language as used on the rest of the pack
Results
## HWL Compliance, by indicator and overall (n=54 packs)

<table>
<thead>
<tr>
<th>Indicators</th>
<th>Number of compliant packs</th>
<th>% Compliant</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Warning location</td>
<td>32/54</td>
<td>59%</td>
</tr>
<tr>
<td>2. Warning size</td>
<td>1/54</td>
<td>2%</td>
</tr>
<tr>
<td>3. HWL elements</td>
<td>41/54</td>
<td>76%</td>
</tr>
<tr>
<td>4. Language</td>
<td>50/54</td>
<td>93%</td>
</tr>
<tr>
<td>Fully compliant packs</td>
<td>1/54</td>
<td>2%</td>
</tr>
</tbody>
</table>
Additional Compliance Issues

1. Significant variation in the printing quality, size and magnification of the graphic

Variation in sizes of smokeless packages
Additional Compliance Issues

2. Split/incomplete HWL and multiple HWL’s on the same side of the pack
Additional Compliance Issues

Summary

• Only 1 of the 54 (2%) of the unique SLT packages were compliant with all four key HWL requirements

• The one pack compliant with all 4 indicators used box shaped packaging

• For most packs, the compliance was poor because of failure to meet the size requirement to cover 85% of the principal display area
Implications and Future Research

- SLT packages are difficult to regulate
  1. Structure of tobacco market
  2. The heterogeneity and diversity of product

- This analysis also raises a few questions
  - Is there a need for standard packaging type and material for smokeless products?

- Our further research: HWL compliance in rural areas might be different
Conclusions

• Findings from this study highlight the poor compliance of SLT manufacturing companies with the HWLs laws in India

• Although the Indian law aligns well with the WHO-FCTC guidelines, this deficit in implementation diminishes the potential health benefits of warning label on tobacco users
Acknowledgements

We would like to thank the entire TPackSS team in Baltimore and the data collection team in India – Healis Sekhsaria Institute for Public Health
Questions??

Thank You!
Ssaratf3@jhu.edu

Protecting Health, Saving Lives—
Millions at a Time