Lessons from New Zealand’s Introduction of Graphic Health Warnings on Tobacco Packaging

Nick Wilson¹, Janet Hoek², Matthew Allen³, Richard Edwards¹, Judy Li¹, George Thomson¹

¹Department of Public Health, University of Otago, Wellington, New Zealand
²Department of Marketing, University of Otago, Dunedin, NZ
³Allen & Clarke Ltd, Wellington, NZ

* Email: nick.wilson@otago.ac.nz

Introduction

Graphic health warnings (GHWs) on tobacco packaging are an effective tobacco control intervention [1]. Given that some countries are yet to introduce GHWs, or are expanding their use, we aimed to identify lessons from New Zealand’s (NZ) experience when regulations requiring tobacco companies to feature GHWs on product packaging were introduced in 2008.

Methods

We obtained online documents relating to the GHW development process and research, along with the final Cabinet paper recommending GHWs (obtained under the Official Information Act). Two officials involved in the process were interviewed. To provide a wider context, comparisons were made with GHWs used elsewhere [2].

Results

The major process lessons identified were:

• That processes used by other developed countries (ie, Canada and Australia) provided useful guidance for NZ. Eg, a mass media campaign run when the GHWs were introduced drew on a parallel Australian campaign.

• That cost savings were achieved by obtaining permission to use copyrighted warnings from other countries (relative to NZ producing all its own graphic images). Nevertheless, this approval process took considerable administrative time.

Key research-related lessons were:

• That commissioned literature review work and qualitative research in NZ was helpful in preparing the case for GHWs (even though the testing was not extensive).

• That careful attention to multiple national laws and trade agreements may have helped avoid legal challenges by the tobacco industry (evident from threats documented in the Cabinet Paper). Subsequent legal advice obtained by the Ministry of Health discounted the likelihood legal action would ensue.

Nevertheless, the final regulations did not specify how monitoring of GHW printing would be monitored. This lack of oversight may have resulted in tobacco companies printing disproportionately more of the less impactful warnings [3]. Nor was there a process built into the legislation for routinely refreshing the warnings beyond rotating the two sets of 7 GHWs. Other potentially suboptimal design features of the GHWs used are detailed in the Table.

Table: Potentially suboptimal design features of the 14 GHWs required on tobacco packing in New Zealand in 2008*

<table>
<thead>
<tr>
<th>Design feature</th>
<th>Further details and comment</th>
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<tbody>
<tr>
<td>The warning only covers 30% of the front of the pack</td>
<td>This proportion is the FCTC minimum level and mirrors the Australian approach. This approach minimised the risk of tobacco companies based in Australia exporting Australia-labelled products to NZ (which would have caused problems with a different Quitline telephone number etc). Policymakers may also have considered this a risk-averse approach that minimised the likelihood of tobacco companies taking legal action.</td>
</tr>
<tr>
<td>The “fear arousal” themes are not particularly strong</td>
<td>This limitation is understandable, given the decision to use cost saving graphic images produced by other countries, the overlap with themes in existing television advertisements, and maximising public acceptability of the first set of GHWs. Nevertheless, it contrasts with the stronger “fear arousal” themes used elsewhere eg, Brazil’s revised set in 2004 and Uruguay’s 2008 set [2].</td>
</tr>
<tr>
<td>Some lacked a focus on specific health conditions</td>
<td>For example, one GHW is of a corpse image (with a toe tag) with no obvious link to a smoking-related death implied or described.</td>
</tr>
<tr>
<td>Some included less recognisable images</td>
<td>For example, the images of damaged internal organs (ie, the heart and the lung images) may not be readily recognised or understood by smokers with lower education levels.</td>
</tr>
<tr>
<td>The Quitline number is small on some of the GHWs</td>
<td>The Quitline number is small (and potentially hard to read for some smokers) compared to that used in Australia (see Figure). Also it is only printed on the back of the pack.</td>
</tr>
<tr>
<td>Visual clutter?</td>
<td>Some GHWs appear visually cluttered as they contain up to two separate graphics and up to 6 separate segments of text (including warning details (n=2-3), the warning in Māori language, the Quitline number, and a copyright note).</td>
</tr>
</tbody>
</table>

* The GHWs are shown on a website [4].

Conclusions

• Given documented tobacco industry opposition to introducing GHWs and the resource constraints facing the NZ Ministry of Health, the implementation process was generally robust.

• Other countries planning to introduce or refresh existing GHWs with stronger imagery GHWs could therefore learn from this experience.

• All countries should support moves by the FCTC Secretariat to develop an international bank of copyright-free warnings.

• For countries with GHWs in place there may be scope for further improvements eg, more frequent refreshing with new GHWs from a larger range, larger GHWs (particularly on the front-of-the-packet), and themes with a higher level of “fear arousal”.

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References