



FDA should introduce plain packaging of tobacco products with warning label in the USA

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We support the Food and Drug Administration’s (FDA) proposal to establish new required cigarette health warnings for cigarette packages. This proposed regulation will promote greater public understanding of the negative health consequences of cigarette smoking. **We further encourage the FDA to extend this beneficial regulation by introducing plain packaging of cigarettes with warning labels.**

What is plain packaging?

“Plain packaging”^{1,2} refers to a standard tobacco product packaging design that removes all brand imagery, including corporate logos and trademarks, colors, and other design elements. Plain packages would display a mandated standard background color with a brand name in a uniform size, font, and position, as well as a health warning label. Health warnings or any other government-mandated information would remain unaffected. See Figure 1A for an example of a standard cigarette pack with a graphic health warning label used in Australia before the introduction of tobacco plain packaging and Figure 1B for an example of a plain cigarette pack with a graphic warning label used in Australia.

Figure 1A. Standard cigarette packs with graphic health warning. **1B.** Plain cigarette packs with graphic health warning.³



Why do we need plain packaging?

Tobacco companies have used colors and words to market their products to smokers and non-smokers and adults and youth by relaying perceptions of lower harm.^{4,5,6,7} For instance, brand descriptors such as the words “light” or “mild” have been used to advertise seemingly less harmful tobacco products.^{8,9,10} As a result, many smokers tend to believe that these products are less addictive and have a lower health risk.^{9,10,11,12} Colors and brand imagery can be also used to disseminate false health information.^{5,13,14,15,16,17} Packs that come in lighter shades close to white to convey that the product is healthy.^{2,15,18,19}

Distortions in perceptions and judgement can also occur when comparing brand variants to the anchor/parent brand.²⁰ For instance, brand variants such as Marlboro “Blue” and “Gold” as compared with the anchor, Marlboro “Red” are inaccurately seen as lower risk products. Therefore, when brand variants positioned to be at lower risk on a health continuum are compared against their full flavour/higher tar anchor brand, there are increased false assessments about health outcomes due to contrast-based distortions in perception and judgment (see Figure 2). The effect of packaging to communicate to consumers is significant.

Figure 2. Contrast effects can cause distortions in perceptions of cigarette packaging.²⁰



Plain packaging across the globe

The World Health Organization Framework Convention on Tobacco Control²¹ recommends the implementation of plain packaging as part of a comprehensive approach to tobacco control.^{22,23} Plain packaging is a key demand reduction measure that diminishes the appeal of tobacco products, whilst limiting the use of tobacco packaging as a form of tobacco advertising and promotions. Plain packaging simultaneously reduces misleading packaging and labelling and improves the effectiveness of health warnings.^{13,14,18,22}

Australia is the first country to successfully implement the plain packaging law in 2012, which disallowed decorative ridges and embellishments on the outer and inner surfaces of tobacco packaging. Under the Tobacco Plain Packaging Act in Australia, guidelines have been set for all tobacco products, that is, processed tobacco, or any product that contains tobacco. According to the law, outer surfaces of cigarettes packs must be the color Pantone 448C, brand names be printed in Lucida Sans, required text and graphic health warnings be displayed, and no logos, brand images and promotional text be printed.^{24,25,26} Following suit, several other countries such as France and United Kingdom have passed similar laws mandating standardization of tobacco product packaging, whilst highlighting health warnings.^{27,28}

Figure 3. Examples of plain packaging of cigarettes and health warning around the globe.²³



Source: Action on Smoking and Health



Source: © New Zealand Ministry of Health



Source: © Alliance contre le tabac



Source: © Commonwealth of Australia



Source: FCTC Implementation Database



Source: Irish Cancer Society



Source: © Helsedirektoratet (Norwegian Directorate of Health)

Benefits of plain packaging

Plain packaging has several key benefits. Research also supports that plain cigarette packaging enhances the salience and impact of graphic warning labels. Graphic warning labels explicitly highlight the risks associated with smoking.^{29,30,31,32} They seem to increase perceptions of vulnerability, reinforce severity of smoking-related illnesses and enhance the association between cigarette packs and a negative smoker stereotype.^{33,34,35} Graphic warnings on a plain cigarette pack has been shown to increase the attention paid to graphic warning labels and the overall perceptions of harm caused by cigarette smoking, and has reduced the social appeal of cigarette smoking in adolescents.^{6,14,18,19,33,35} Plain packaging in conjunction with graphic health warnings increases the efficacy of health warnings, reduces false health beliefs about cigarettes, and decreases brand appeal especially among youth and young adults.^{6,14,18,19,33} These results have been seen in experimental,^{33,34,36,37} qualitative,³⁵ naturalistic³⁸ and survey studies^{39,40} conducted on samples from Australia, Canada, Scotland

and New Zealand as well as supported by reviews exploring plain packaging across the globe.^{2,41,42,43,44}

Specifically, naturalistic and experimental studies in New Zealand and Scotland have shown that plain packaging encourages smoking cessation and avoidant behaviours; young adult smokers smoke less around others and are more likely to forgo cigarettes, and think more about quitting compared to when they use branded packs.^{38,40} Furthermore, the introduction of plain packaging in Australia in 2012 also appeared to encourage smokers to quit.^{39,45,46} There was a 78% increase in the number of calls to the smoking cessation Quitline in the first month following the introduction of plain packaging. This effect of increased calls was seen to last 43 weeks compared to the 20 weeks in 2006, after the introduction of graphic health warnings.²⁸

Overall, tobacco branding elements of color, design and descriptors act together in a way that forms consumers' perceptions of product qualities and relay perceptions of lower health risk. Plain packaging reduces the positive appeal of tobacco products and enhances health warning recall.^{36,37,41} Plain packaging is needed to counter the illusion of healthier tobacco products that certain types of branding and imagery can communicate to the smokers and non-smokers.

We appreciate that the FDA is sensitive to the advertisers' freedom to market without constraint. However, the idea behind proposing plain packaging is not to unduly burden protected speech but to recommend more transparent marketing that does not inadvertently promote addiction.

Plain packaging should not be limited to cigarettes only but applied across diverse tobacco products

Plain packaging need not be restricted to just cigarettes but should be extended to all tobacco products such as cigars, cigarillos, smokeless tobacco, hookah, heat-not-burn products and e-cigarettes. The same principles of tobacco marketing that make cigarettes more attractive and misleading health perceptions could also apply to other tobacco products. This would be a helpful supplement to the current strict regulations regarding required health warning statements on tobacco packaging.⁴⁷

Summary

Existing literature, as summarized above, supports the benefits of plain packaging in enhancing the graphic health warning labels and building transparency to the consumers about the health outcomes of the tobacco products. Furthermore, evidence from other countries^{36,38,40,41} also supports the use of plain packaging to reduce product appeal and attractiveness, misinformation, and to increase salience of health warning graphics and smoking cessation rates.

We believe that including plain packaging of tobacco products as part of the FDA's tobacco control activities will assist the overall goal of reducing tobacco-related harm in our communities. We urge the FDA to implement plain packaging of tobacco products to eliminate tobacco packaging as a form of advertising and promotion. We also suggest extending this proposed regulation to all other tobacco products in addition to cigarettes.

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