

Editorial

Prohibiting tobacco advertising, promotions & sponsorships: Tobacco control best buy

In the 1990s tobacco smoking and exposure to second hand smoke (SHS) ranked among the top three risk factors contributing to the global burden of disease along with childhood underweight and household air pollution. Today, after two decades, tobacco smoking and exposure to SHS still rank among the top three risk factors despite the other risk factors being replaced by high blood pressure and alcohol use, which are essentially risk factors contributing to non-communicable diseases (NCDs)¹. Tobacco control has been identified as a high priority, cost-effective intervention along with reduction of dietary salt intake and treatment of people at high risk for cardiovascular disease, which can aid in achieving the global target of 25 per cent reduction in NCD related mortality by 2025².

Tobacco industry has been instrumental in spreading the tobacco epidemic globally through aggressive marketing campaigns. It is the only industry that kills its 5.4 million loyal customers every year³. In 2005, the WHO Framework Convention on Tobacco Control (WHO FCTC), the first treaty negotiated under the auspices of the WHO, came into force⁴. Article 13 of FCTC suggests a comprehensive advertising ban, within five years of entry into force of FCTC for each party. Currently, only 19 countries of the world (representing 6% of the global population) are covered by comprehensive ban on tobacco advertising, promotion and sponsorship (TAPS), with 101 countries imposing partial bans and 74 countries having no ban at all⁵. This is a matter of public health concern. Comprehensive TAPS ban would lead to reduction in initiation and continuation of tobacco use; as such a policy measure would have large population level impact, thereby reducing demand for tobacco. Therefore, it is

regarded as a tobacco control 'Best Buy'⁶. The theme for the World No Tobacco Day this year is 'Ban Tobacco Advertising, Promotion and Sponsorship', the objective being to encourage the Parties to impose a comprehensive TAPS ban and to strengthen efforts to reduce tobacco industry interference in introducing and enforcing such comprehensive bans.

Despite existing TAPS prohibition laws, tobacco industry circumvents the laws to promote their products by employing innovative and at times, covert marketing strategies. Indirect or surrogate tobacco advertising such as dark advertising, brand stretching, corporate social responsibility (CSR) activities, promotion through films and new media such as internet, discounts or free-gift offers, distribution of free samples, sale of tobacco products in the form of children's sweets/toys, *etc.* gained momentum with increasing pressure on tobacco industry^{7,8}. Guidelines for implementing Article 13 of FCTC, describe comprehensive TAPS ban to apply to all form of commercial communication, recommendation or action and all forms of contribution to any event, activity or individual with the aim, effect or likely effect of promoting a tobacco product or tobacco use either directly or indirectly⁹.

Exposure to tobacco advertising among Indians

To protect the general populace from harmful effects of tobacco use, the Cigarettes and Other Tobacco Products (Prohibition of Advertisement and Regulation of Trade and Commerce, Production, Supply and Distribution) Act (COTPA), 2003 was enacted in India. Section 5 of COTPA prohibits all forms of TAPS in line with Article 13 of the WHO FCTC. Despite the existence of TAPS ban in India, exposure to tobacco advertising and promotion is still prevalent. Among

Indian school-going youth aged 13-15 yr, exposure to pro-cigarette advertisements on billboards in the past 30 days increased from 71.6 in 2006 to 74.4 per cent in 2009^{10,11}. Twenty eight per cent of Indian adults are exposed to cigarette advertising, and 47 and 55 per cent, respectively are exposed to *bidi* and smokeless tobacco (SLT) advertisements as per GATS (Global Adult Tobacco Survey) 2010¹². COTPA allows 'On-Pack advertising' and 'Point of Sale (PoS) advertising' with some restrictions.

Need for comprehensive TAPS ban

Substantial evidence now exists of a causal relationship of tobacco advertising and promotion with increased tobacco use, especially in the youth^{7,13}. Cross-sectional^{14,15} and longitudinal studies¹⁶ conducted with school-going adolescents in India also support these findings. A review of international studies suggests that PoS marketing and displays are associated with increased smoking susceptibility, experimentation, and uptake among children, and with increased craving among adults¹⁷. Celebrity endorsement of tobacco products in films is also causally associated with tobacco use among the youth with a dose-response relationship⁷. A study conducted with about 4000 school-going adolescents in Delhi concluded that students highly exposed to tobacco use in Bollywood films are at more than twice the risk of being ever tobacco users compared with the least exposed¹⁸. Comprehensive TAPS ban would ensure that youth and adults are not misled by these advertisements and promotions. Tobacco companies have designed product promotion campaigns around sports and music events providing links on Facebook and Twitter, clearly targeting youngsters through this powerful communication channel. Advertising through these new media channels needs to be addressed under comprehensive TAPS ban.

Engagement in CSR activities by tobacco industry is a more recent strategy wherein, the tobacco companies try to portray their image as being socially responsible and ethical¹⁹. The industry on one hand funds activities such as youth anti-smoking programmes, reforestation campaigns and environmental camps for school children, and on the other hand continues the promotion and sale of tobacco products^{8,19}. Article 5.3 of the FCTC guidelines recommend, denormalising and regulating activities described as 'socially responsible' by the tobacco industry, including but not limited to activities described as CSR²⁰.

In India, PoS advertising by tobacco companies is rampant and most common violations in this regard include oversized advertisement boards, which are frequently backlit, placement of two boards together to give the impression of one large board, placement of multiple advertisements on one board and placement of advertisement boards on shops not selling tobacco²¹. India needs to step up enforcement of its TAPS ban legislation, as indirect methods of advertising and promotions are rampant. There is also imminent need to amend COTPA to remove "On pack advertising" and "PoS" advertising.

Recent progress in India on restricting TAPS

The Hon'ble Supreme Court of India on January 3, 2013 vacated the stay on rules related to the PoS advertising of tobacco products, which was imposed by the Bombay High Court in 2006, demonstrating commitment of the Indian judicial system towards better health of its citizens through effective tobacco control. Following the hearing in January 2013, Ministry of Health and Family Welfare (MoHFW), Government of India (GOI), issued a letter to the Chief Secretaries and Director Generals of Police of all Indian States/UTs to ensure that all steps are taken to curb the violations of PoS advertising rules. Under India's National Tobacco Control Programme (NTCP), monitoring committees specifically for Section 5 of COTPA at State and district levels, as well as a national level steering committee, have been mandated, to take cognizance of direct/indirect advertising of tobacco products²². The MoHFW has continued to show its commitment to tobacco control by introducing comprehensive tobacco control legislation and for some measures, India has been identified as a global leader. The Government of India has recently introduced trendsetting rules related to depiction of tobacco imagery in Indian films, a popular entertainment media²³.

What needs to be done?

The only advertising venue now allowed in India for the tobacco industry is 'on-pack' advertising. Tobacco packs are important means of advertising for the industry and they employ attractive imagery such as logos, brand names, colours, *etc.* on the pack for the same. Plain, standardized tobacco packaging as currently being implemented by the Australian Government, mandates prevention of promotion through on-pack advertising and enhances effectiveness of graphic health warnings on the pack. Results of a feasibility study for plain packaging of tobacco products conducted in Delhi

revealed that over 80 per cent of participants believed plain packaging would reduce the attractiveness, appeal and promotional value of the tobacco pack, over 60 per cent believed plain packaging would help in reducing experimentation and initiation of tobacco among youth and over 80 per cent believed, it would motivate tobacco users to quit²⁴. Multi-disciplinary researchers and tobacco control advocates are strongly proposing introduction of plain packaging of tobacco products in India to enhance effectiveness of graphic warnings in India. A Private Members' Bill has been introduced on this issue in the Indian Parliament, which remains to be discussed²⁵.

A TAPS ban should be comprehensive as partial bans or voluntary arrangements do not work. A comprehensive ban on all TAPS could achieve a reduction in tobacco use by seven per cent⁵.

Counter-advertising through mass media accompanied with school- or community-based programmes, warning about the dangers of tobacco use has been an effective strategy in preventing tobacco use as well as encouraging the users to quit⁷. Mass media campaigns form a major strategy for tobacco control under India's NTCP²². Counter-advertising through Government efforts needs to be stepped up to counter misleading messages conveyed by the tobacco industry through TAPS campaigns.

Conclusion

The WHO, while proposing targets for reducing the NCD burden, has proposed a 30 per cent reduction in tobacco use globally by 2025. The global narrative on tobacco control is increasingly exploring the concept of tobacco endgame, which envisions reducing tobacco prevalence and availability to minimal levels. Experts aiming at the endgame give a target for tobacco-free world, where prevalence for tobacco use in each country would reduce to less than five per cent by 2040²⁶. This would require tobacco control measures be strictly enforced as per FCTC guidelines and innovative measures beyond FCTC be introduced in countries having political commitment to end the tobacco epidemic in their country.

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