

# Consultation on implementing inserts in cigarette and hand rolling tobacco packaging

## Action on Smoking and Health (ASH) response

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## Contents

Placement of pack inserts in packaging.....	2
Shape and size of pack inserts .....	5
Material to use for pack inserts .....	7
Messaging and imagery on pack inserts.....	9
Equal use of messaging .....	13
Access to pack inserts messaging.....	13
Implementation timelines .....	13
Any other comments .....	14

## Placement of pack inserts in packaging

### Cigarette packaging

For flip-top cigarette packaging, we propose that loose inserts are placed between the cigarette bundle and the inner frame of the packet. The inserts should be easily removable and not attached to the rest of the packaging in any way.

#### **Do you agree or disagree with the proposed placement of inserts for flip-top cigarette packaging? (Optional)**

- Agree
- Disagree
- Don't know

For soft pack cigarette packaging, we propose that quit messaging is folded lengthwise twice and added in the side of the package.

#### **Do you agree or disagree with the proposed placement of inserts for soft pack cigarette packaging? (Optional)**

- Agree
- Disagree
- Don't know

For shoulder hinged cigarette packaging, we propose that the inserts are placed inside the pack, on top of the bundled cigarettes.

#### **Do you agree or disagree with the proposed placement of inserts for shoulder hinged cigarette packaging? (Optional)**

- Agree
- Disagree
- Don't know

#### **If you have any comments on the proposed placement of inserts for cigarette packaging, please include them here. (Optional, maximum 500 words)**

*ASH welcomes the Government's proposals on the placement of pack inserts in cigarette packaging as part of wider efforts to reduce smoking prevalence. Evidence shows that health-promoting pack inserts can increase quit attempts, positively influence smoking-related attitudes, beliefs and intentions, and support behaviour change when used alongside existing measures such as standardised packaging and pictorial health warnings. By encouraging cessation, inserts also have the potential to reduce exposure to second-hand smoke and its associated harms.<sup>1</sup>*

*ASH broadly agrees with the proposed placement of inserts for cigarette packaging. Inserts should be placed where they will be most visible and impactful during normal pack use, so they are clearly noticed and cannot be easily overlooked or ignored. Inserts should complement, and not obscure, existing pictorial health warnings on the exterior of packs.*

*We support the requirement that inserts are placed loose within the packet rather than affixed to packaging surfaces. Loose inserts may be more likely to be seen, handled and retained, increasing the likelihood of repeated exposure. This approach is also clearly feasible: tobacco manufacturers have long used the interior of cigarette packs to include cards, coupons and promotional material, demonstrating that inclusion of inserts within packs is well established from a production perspective.*

*We agree that inserts should be positioned so that they are encountered when the pack is opened and during repeated use, across all cigarette pack formats. Placement should ensure inserts are visible on opening and not concealed by the cigarette bundle or pack structure.*

**Recommendation:** *The proposed placement of inserts in soft pack cigarette packaging, where inserts may be folded and positioned at the side of the pack, could reduce visibility and limit engagement. We recommend that alternative placements are considered to ensure that inserts are equally impactful across all cigarette packaging styles.*

*In the longer term, we recommend that Government considers prohibiting soft pack cigarette packaging. This would support greater consistency across cigarette packaging formats and reduce opportunities for manufacturers to exploit design-related loopholes.*

### **Hand rolling tobacco packaging**

For wrap-around hand rolling tobacco packaging, we propose that instead of a pack insert, the same quit messaging is printed on the inner surface of the flap. The messaging must be positioned below the text health warning as the text health warning is positioned at the top edge of the pack when the pack is fully opened. The quit messaging must be visible, and not covered by packaging seals.

### **Do you agree or disagree with the proposed placement of messaging for wrap-around hand rolling tobacco packaging? (Optional)**

- Agree
- Disagree
- **Don't know**

**If you have any comments on the proposed placement of messaging for wrap-around hand rolling tobacco packaging, please include them here. (Optional, maximum 500 words)**

*ASH strongly supports ensuring that hand-rolling tobacco (HRT) is regulated to the same standard as cigarettes. Evidence shows that people who use HRT are more likely to be younger, more addicted, and from more disadvantaged backgrounds than cigarette smokers, and are less likely to make quit attempts.<sup>ii</sup> Messaging on pack inserts must reach HRT and factory-made cigarette smokers equally.*

*Pouches are handled differently to cigarette packs and are often opened and accessed repeatedly over a longer period of time. This makes it especially important that any insert or printed material is positioned so that it is clearly visible each time the pouch is opened, rather than being concealed by the tobacco itself or obscured by folds or internal seams.*

*The current proposal to print insert content directly onto wrap-around packaging limits the smoker's ability to retain the insert as a separate item. Given the importance of reaching HRT users, this approach should be monitored and evaluated over time to ensure it does not impact engagement with inserts.*

*In Australia, loose inserts or those affixed with glue to internal surfaces of the pouch have been successfully implemented and demonstrate that alternative placement options are feasible.<sup>iii</sup>*

*The NIHR PHPRU study examined responses to pack inserts among adolescent non-smokers and found that all insert themes reduced their likelihood of trying smoking.<sup>i</sup> Removable loose inserts, which are more likely to be seen by non-smokers living with people who smoke, could therefore deliver additional preventive benefits beyond cessation support.*

*However, it is possible that printing quit information directly on the packaging could have advantages, as it ensures the information is immediately visible without the need to remove or unfold an insert, and provides repeated exposure each time the pack is opened.*

**Recommendation:** Overall, ASH supports the inclusion of pack inserts in hand-rolling tobacco packaging and emphasises that their placement should prioritise visibility, prominence and consistency with cigarette packaging, to ensure that HRT users are not subject to weaker or less effective regulation. The approach of printing messaging directly onto packaging requires monitoring and evaluation to ensure this does not compromise impact.

**Do you agree or disagree with the proposed placement of inserts for cylinder and standing pouch packaging of hand rolling tobacco? (Optional)**

- Agree
- Disagree
- Don't know

**If you have any comments on the proposed placement of inserts for cylinder and standing pouch packaging of hand rolling tobacco, please include them here. (Optional, maximum 500 words)**

*ASH supports the proposed placement of inserts for cylinder and standing pouch packaging of hand rolling tobacco. Our priority is that inserts are positioned so they are clearly visible on opening and not concealed by the tobacco, internal folds, or pack design. Placement should ensure inserts are as prominent and unavoidable as those in cigarette packaging.*

## **Shape and size of pack inserts**

### **Cigarette packaging**

For flip-top and shoulder hinged cigarette packaging, we propose that the inserts are sized based on the pack's outer dimensions, but reduced by 8mm in both width and height.

**Do you agree or disagree with the proposed sizing of inserts for flip-top and shoulder hinged cigarette packaging? (Optional)**

- Agree
- Disagree
- Don't know

For soft pack cigarette packaging, we propose that the inserts must measure 48mm wide by 95mm high, and when folded, 16mm wide and 95mm high.

**Do you agree or disagree with the proposed sizing of inserts for soft pack cigarette packaging? (Optional)**

- Agree
- Disagree
- Don't know

**If you have any comments on the proposed sizing of inserts for cigarette packaging, please include them here. (Optional, maximum 500 words)**

*ASH supports the proposed sizing of inserts for cigarette packaging. The priority should be that the inserts are sufficiently large to ensure clear visibility and legibility for all consumers, but not so large that it causes any difficulty removing these from the packaging.*

### **Hand rolling tobacco packaging**

For wrap-around hand rolling tobacco packaging, we propose the printed quit messaging must measure 115mm wide by 63mm high.

#### **Do you agree or disagree with the proposed sizing of messaging for wrap-around hand rolling tobacco packaging? (Optional)**

- Agree
- Disagree
- Don't know

**If you have any comments on the proposed sizing of messaging for wrap-around hand rolling tobacco packaging, please include them here. (Optional, maximum 500 words)**

*ASH supports the proposed sizing of inserts for cigarette packaging. The priority should be that the inserts are sufficiently large to ensure clear visibility and legibility for all consumers.*

For hand rolling tobacco packaged in cylinders and standing pouches, we propose that the inserts must measure 55mm wide by 80mm high.

#### **Do you agree or disagree with the proposed sizing of inserts for cylinder and standing pouch packaging of hand rolling tobacco? (Optional)**

- Agree
- Disagree
- Don't know

**If you have any comments on the proposed sizing of inserts for cylinder and standing pouch packaging of hand rolling tobacco, please include them here. (Optional, maximum 500 words)**

### **Shape of loose inserts and printed messaging**

We propose that loose inserts and printed messaging are rectangular in shape. They must not be bevel shaped or embellished in any way.

#### **Do you agree or disagree with the proposed shape of the inserts? (Optional)**

- Agree
- Disagree
- Don't know

**If you have any comments on the proposed shape of inserts, please include them here. (Optional, maximum 500 words)**

*ASH supports the proposed shape of inserts. It is important that the shape is standardised and non-customisable across brands and pack types, to prevent manufacturers from using design variations to reduce visibility, impact, or make the product more appealing. Standardisation will ensure inserts serve their intended public health purpose without being exploited for marketing.*

## **Material to use for pack inserts**

### **Cigarette packaging**

For all cigarette packaging, we propose that loose inserts must be recyclable and coated with a clear, protective matt finish. The clear coating must not prevent the insert from being recycled.

**Do you agree or disagree with the proposed material of inserts for cigarette packaging? (Optional)**

- Agree
- Disagree
- Don't know

For flip-top and shoulder hinged cigarette packaging, we propose that the inserts must be printed on 180gsm paper.

**Do you agree or disagree with the proposed paperweight of inserts for flip-top and shoulder hinged cigarette packaging? (Optional)**

- Agree
- Disagree
- Don't know

For soft pack cigarette packaging, we propose that the inserts must be printed on 80gsm paper, to allow for the folding required.

**Do you agree or disagree with the proposed paperweight of inserts for soft pack cigarette packaging? (Optional)**

- Agree
- Disagree

- Don't know

**If you have any comments on the proposed material and paperweight of inserts for cigarette packaging, please include them here. (Optional, maximum 500 words)**

*ASH agrees that inserts should be fully recyclable and designed so that any coating does not interfere with recycling. The material and weight should also allow the insert to be retained by the smoker after the pack is discarded, extending its potential as a prompt to support quitting.*

**Recommendation:** *We note that the paper weight proposed for inserts in soft cigarette packaging is significantly lighter, which may undermine durability and retention, and again raise the question of whether this pack format should be removed to avoid weakening the policy's effectiveness.*

### **Hand rolling tobacco packaging**

For wrap-around hand rolling tobacco packaging, we propose that quit messaging must be printed directly onto the packaging and the pouch must be coated with the same protective finish that is currently used.

**Do you agree or disagree with the proposed material of messaging for wrap-around hand rolling tobacco packaging? (Optional)**

- Agree
- Disagree
- Don't know

**If you have any comments on the proposed material of messaging for wrap-around hand rolling tobacco packaging, please include them here. (Optional, maximum 500 words)**

*As previously highlighted, printing messaging directly onto wrap-around packaging means smokers do not have the option of retaining a loose insert, which may reduce the duration of exposure compared with cigarette pack inserts.*

**Recommendation:** *This approach should be monitored and evaluated over time to ensure that it does not compromise the impact of inserts.*

*As with cigarette pack inserts, the material should be fully recyclable and of sufficient weight and durability to ensure that messaging remains legible throughout normal use.*

For hand rolling tobacco packaged in cylinders and standing pouches, we propose that loose inserts must be recyclable and coated with a clear, protective matt finish. The clear coating must not prevent the insert from being recycled. We propose that the inserts must be printed on 200gsm paper.

**Do you agree or disagree with the proposed material and paperweight of inserts for cylinder and standing pouch packaging of hand rolling tobacco? (Optional)**

- Agree
- Disagree
- Don't know

**If you have any comments on the proposed material and paperweight of inserts for cylinder and standing pouch packaging of hand rolling tobacco, please include them here. (Optional, maximum 500 words)**

## **Messaging and imagery on pack inserts**

### **Loose pack inserts**

The proposed messaging and imagery of loose pack inserts applies to:

- all cigarette packaging
- cylinder hand rolling tobacco packaging
- standing pouch hand rolling tobacco packaging

We propose that the loose inserts are printed on both sides, with quit messaging on one side. On the other side, we propose that the loose inserts have a QR code and web address to a smoking cessation website, as well as the 4 nation healthcare logos. For soft pack cigarette packaging, part of the back of the insert would also have the text health warning on it.

**Do you agree or disagree with the proposed messaging and imagery that would be included on loose inserts? (Optional)**

- Agree
- Disagree
- Don't know

We propose that the loose inserts are printed in portrait orientation.

**Do you agree or disagree with the proposed printing orientation of loose inserts? (Optional)**

- Agree

- Disagree
- Don't know

**If you have any comments on the proposed messaging or printing orientation of loose inserts, please include them here. (Optional, maximum 500 words)**

*1/2 The answer to this question is split over this question and the next.*

*ASH welcomes the emphasis on using established public health evidence to inform the proposed pack insert messages. The themes reflect well-recognised factors associated with successful smoking cessation, including motivation, perseverance and access to effective support, and are appropriate for reaching a broad range of people who smoke.<sup>i</sup>*

### **Recommendations:**

#### *Tentative language*

*Tentative language should be avoided. Statements such as “quitting can benefit your health” could be strengthened to “quitting improves health” reflecting the consistent evidence base showing improved health outcomes following cessation.<sup>iv</sup> The NIHR PHPRU study tested the wording “Quitting benefits your health”, which is clearer.<sup>i</sup>*

#### *Mental health*

*The wording on the mental health insert should address the misconception that smoking relieves stress. We suggest:*

*Quitting can improve your mental health*

*Once they quit smoking, many people feel:*

- More positive in mood
- Less stressed
- Less anxious and depressed

*Smoking may feel calming in the moment, but this soon gives way to unpleasant withdrawal symptoms and cravings.*

*Stopping smoking is the first step to breaking the cycle.*

*We also recommend removing the phrase “think positive” as it is directive and risks trivialising the experience of having poor mental health.*

#### *Relapse and perseverance*

*The wording “relapsing back to smoking can be a normal part of the quitting process” and “feel good about every cigarette you don’t smoke” may risk being interpreted as permissive. A more constructive framing would emphasise persistence without normalising continued smoking, for example “Keep trying to quit, most smokers try to*

*quit more than once before they succeed. Every time you try you learn more about what works for you”, in line with wording used in the NIHR PHPRU study.<sup>i</sup>*

### **Wrap-around hand rolling tobacco packaging**

We propose that the printed messaging on wrap-around hand rolling tobacco packaging includes:

- quit messaging
- a QR code and web address to a smoking cessation website
- the 4 nation healthcare logos

This is the same messaging as shown on the loose inserts.

#### **Do you agree or disagree with the proposed printed messaging for wrap-around hand rolling tobacco packaging? (Optional)**

- Agree
- Disagree
- Don’t know

We propose that the messaging printed on wrap-around hand rolling tobacco packaging must be printed in landscape orientation.

#### **Do you agree or disagree with the proposed printing orientation of printed messaging for wrap-around hand rolling tobacco packaging? (Optional)**

- Agree
- Disagree
- Don’t know

#### **If you have any comments on the proposed messaging or printing orientation of messaging for wrap-around hand rolling tobacco packaging, please include them here. (Optional, maximum 500 words)**

*2/2 The answer to this question is split over this question and the previous.*

#### ***Reverse side of inserts***

*Reliance on digital signposting alone risks excluding some people who smoke, particularly those in priority groups who may have limited access to smartphones, data or the internet. It is therefore important that the back of the insert also clearly signposts non-digital routes to support, e.g. “You can also speak to a GP, pharmacist or other health professional about getting help to quit.”*

*We also encourage consideration of accessibility for people who do not speak English as a first language or who have lower literacy levels. Clear signposting to translated or*

*multilingual support via the linked website, or the use of simple, accessible language, would help ensure the inserts reach a wider range of people who smoke.*

*The digital content linked to each insert should be clearly aligned with the specific topic of that insert. For example, inserts focused on mental health should link to information on quitting smoking for people with mental health conditions. This could be achieved either by linking to a clear, accessible landing page with signposted routes to further information for each messaging theme, or by directing users straight to topic-specific content with the option to access broader stop smoking information if needed. This will ensure that people are exposed to new messages via the QR codes, rather than a single repetitive stop smoking page.*

#### ***Message renewal***

*The content of insert messages must be reviewed and refreshed over time. Without periodic renewal, evidence examining the effects of graphic health warnings, shows that there is a risk of desensitisation,<sup>v</sup> reducing the effectiveness of the messages.*

*As pack inserts represent a novel approach in the UK, regular review and renewal of inserts would allow messaging to be adapted to reflect insights from evaluation of their impact. It would also ensure messaging reflects emerging evidence, and persistent or new misconceptions, helping to ensure that pack inserts continue to support quitting effectively over the longer term. This is also true and should be implemented for graphic health warnings on all tobacco product packaging.*

#### ***Suggested future messaging***

*Given the scale of public misunderstanding about vaping,<sup>vi</sup> consideration could be given to a dedicated insert focused on vaping and smoking cessation, as messaging is updated over time. A standalone insert would allow clearer explanation of vaping's role in helping people quit smoking and its relative risks compared with continued smoking, which may be difficult to communicate fully within a single combined message.*

*A hand-rolling tobacco-specific insert could be considered to address myths about HRT being less harmful than manufactured cigarettes as part of future updates to insert messaging. Evidence shows that many people who use hand-rolling tobacco, particularly younger men, believe it to be a more "natural" or safer option, even though it carries comparable health risks.*

*Care should be taken to ensure that any future messaging intended to address misperceptions is framed in a way that is credible to people who smoke, correcting false beliefs without risking confusion or disengagement.<sup>vii</sup>*

**If you have any comments on the consideration of inks for loose inserts and printed messaging, please include them here. (Optional, maximum 500 words)**

## Equal use of messaging

We propose that across all cigarette and hand rolling tobacco packaging, the different insert messages should appear in, or on, equal numbers of retail packages. This applies to different brand families, brands and packaging sizes and types.

**Do you agree or disagree with the proposed equal use of messaging? (Optional)**

- Agree
- Disagree
- Don't know

**If you have any comments on the proposed equal use of the messaging, please include them here. (Optional, maximum 500 words)**

*ASH supports the proposed equal use of messaging across all cigarette and hand rolling tobacco packaging. Applying messages evenly across brand families, brands, pack sizes and pack types is essential to ensure comprehensive coverage and prevent any gaps or loopholes in implementation.*

## Access to pack inserts messaging

We propose that manufacturers will access the pack insert messaging through an online platform called DH eXchange. Manufacturers currently access the combined health warnings through this platform.

**Do you agree or disagree with the proposed method of providing manufacturers with access to the messaging? (Optional)**

- Agree
- Disagree
- Don't know

**If you have any comments on the proposed method of providing manufacturers with access to the messaging, please include them here. (Optional, maximum 500 words)**

## Implementation timelines

We propose that manufacturers have a maximum of 12 months after the regulations are made to implement the requirements in legislation.

**Do you agree or disagree with the proposed implementation timelines? (Optional)**

- Agree
- Disagree
- Don't know

**If you have any comments on the proposed implementation timelines, please include them here. (Optional, maximum 500 words)**

*Implementation timelines should be kept as short as practicable and strongly urges Government to avoid unnecessary delay. ASH believes that implementation within six months is both reasonable and achievable, particularly given the nature of the proposed changes.*

*Pack inserts do not require fundamental redesign of external packaging and are therefore less complex to implement than previous tobacco packaging reforms. Plain packaging legislation in the UK, a much more substantial change for industry, was successfully implemented within a 12-month timeframe.<sup>viii</sup>*

**Recommendation:** *Delaying implementation beyond 6 months would postpone the public health benefits of pack inserts and miss opportunities to encourage people to quit.*

## **Any other comments**

**If there are any cigarette or hand rolling tobacco packaging types we haven't included in this consultation, please include them here. (Optional, maximum 500 words)**

*The introduction of pack inserts should sit within a consistent and comprehensive approach to regulating tobacco products.*

**Recommendation:** *We recommend extending inserts to other tobacco products such as cigars, cigarillos and pipe tobacco. This will ensure that all tobacco users are exposed to quit messaging. This is in line with the government's proposal to extend standardised packaging to all tobacco products and will help to prevent manufacturers from exploiting regulatory loopholes.*

**If you have any further comments on the proposals in this consultation, please include them here. (Optional, maximum 500 words)**

*ASH broadly supports the proposals set out in this consultation and we urge the government to introduce pack inserts as soon as possible.*

### *Aligning insert messages with broader communications*

**Recommendation:** *The messaging in pack inserts must be part of a wider, sustained programme of public communications. This is vital for increasing quit attempts and improving awareness of the harms of smoking and options available for quitting.*

*National and regional mass media campaigns, alongside engagement through healthcare settings and community-based services, can play a critical role in reinforcing and contextualising pack insert messages. This is particularly important for topics where public misunderstanding is widespread, such as the impact of smoking on mental health and the relative harms of vaping compared with smoking.*

### *Dissuasive cigarettes*

**Recommendation:** *In addition to introducing pack inserts, we recommend implementing cigarette warnings or ‘dissuasive cigarettes’ to further reduce the appeal and reinforce the harms of smoking. Research suggests that cigarettes with unattractive colours or prominent health warnings on the stick are perceived as less appealing and less likely to encourage trial than standard cigarettes.*<sup>ix</sup>

### *Preventing inserts from being exploited by industry*

**Recommendation:** *Safeguards should be put in place to ensure that pack inserts cannot be used to add flavour or alter the sensory characteristics of tobacco products. Tobacco companies have attempted to circumvent flavour bans in the UK and EU by introducing accessories including flavour infusion cards and menthol filter tips, which can impart menthol flavour into cigarettes or roll-your-own tobacco when inserted into packs.*<sup>x xi</sup>

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<sup>i</sup> NIHR Public Health Policy Research Unit. [Testing the optimal design of health-promoting pack inserts and dissuasive cigarettes](#). Final report. 2023.

<sup>ii</sup> <https://www.jstor.org/stable/27020143>

<sup>iii</sup> <https://www.health.gov.au/sites/default/files/2024-11/guide-to-health-promotion-inserts.pdf>

<sup>iv</sup> <https://www.nhs.uk/better-health/quit-smoking/why-quit-smoking/benefits-of-quitting-smoking/>

<sup>v</sup> Woelbert E, d'Hombres B. [Pictorial health warnings and wear-out effects: evidence from a web experiment in 10 European countries](#). Tob Control. 2019 Aug;28(e1):e71-e76. doi: 10.1136/tobaccocontrol-2018-054402.

<sup>vi</sup> ASH. [New Data on Vaping Uncovers a Public Health Disconnect](#). Press release. July 2025.

<sup>vii</sup> Moodie C, O'Donnell R. [Reasons for Using Roll-Your-Own Tobacco and Perceptions of Health-Promoting Pack Inserts: A Focus Group Study with Roll-Your-Own Tobacco Smokers in Scotland](#). Nicotine Tob Res. 2022 Nov 12;24(12):1937-1944. doi: 10.1093/ntr/ntac184.

<sup>viii</sup> <https://www.legislation.gov.uk/ukssi/2015/829/contents?utm>

<sup>ix</sup> Moodie C, Gendall P, Hoek J, et al. [The Response of Young Adult Smokers and Nonsmokers in the United Kingdom to Dissuasive Cigarettes: An Online Survey](#). Nicotine Tob Res. 2019 Jan 4;21(2):227-233. doi: 10.1093/ntr/ntx261.

<sup>x</sup> Hiscock R, Silver K, Zatoński M, et al. [Tobacco industry tactics to circumvent and undermine the menthol cigarette ban in the UK](#). Tobacco Control. 2020;29:e138-e142.

<sup>xi</sup> [Menthol Cigarettes: Industry Interference in the EU and UK - Tobacco Tactics](#)