

UK Tobacco Advertising and Promotion

February 2019

Key Points

- There is a clear, established relationship between tobacco advertising and consumption
- As a result, advertising in the UK is banned in line with FCTC guidelines
- Standardised packaging for these products has been required since 2016
- Evidence suggests that tobacco companies now use other marketing techniques such as 'push promotion' incentives towards stockists and suppliers to promote the consumption of tobacco
- E-cigarettes are subject to advertising restrictions in line with the EU Tobacco Products Directive. However, these are not as extensive as those applied to tobacco products.

Background

In a British television documentary made in 1988, Fritz Gahagan, a former marketing consultant for big tobacco, provided insight into the fundamental paradox faced by the industry:

"The problem is how do you sell death? How do you sell a poison that kills 350,000 people per year, a 1,000 people a day? You do it with the great open spaces ... the mountains, the open places, the lakes coming up to the shore. They do it with healthy young people. They do it with athletes. How could a whiff of a cigarette be of any harm in a situation like that? It couldn't be - there's too much fresh air, too much health - too much absolute exuding of youth and vitality - that's the way they do it".¹

The marketing of tobacco has been a key factor in driving the global tobacco epidemic: recruiting new, young smokers and positioning smoking not as something deadly but something aspirational. This successful strategy has facilitated the creation of a massive global tobacco market over the last century. However, governments around the world are fighting back and the UK has been at the forefront of that fight.

Most forms of tobacco advertising and promotion in the UK were banned following the implementation of the Tobacco Advertising and Promotion Act 2002 (TAPA).² The law originally specified a ban on print media and billboard advertising, and was subsequently extended to incorporate a ban on direct marketing and sponsorship, although a ban on tobacco sponsorship of global events – mainly affecting Formula One motor racing – was not introduced until 2005.³ A ban on the use of misleading terms such as ‘light’ or ‘mild’ was introduced in 2003,⁴ and a legal requirement for tobacco packaging to include picture warnings was introduced in 2008.⁵ In retail environments, restrictions on the size of tobacco advertising at the point of sale (PoS) were introduced in 2004, before an total ban on the open display of tobacco products as part of the Regulations to the Health Act 2009.⁶

Tobacco advertising on broadcast media (television and radio) was prohibited by the Broadcasting Acts of 1990⁷ and 1996⁸, as well as the EU Audiovisual Media Services Directive 2010.⁹

Timeline of legislation:

Year of legislation	Year of enactment	legislation	Prohibited advertising:
1964	1965	Television Act	Television cigarette adverts
1990	1990	Broadcasting Act	Loose tobacco + cigars on TV and all tobacco products on radio
2002	2003	Tobacco Advertising and Promotion Act	Press and billboards + direct marketing
2002	2005	Tobacco Advertising and Promotion Act	Formula 1 and sporting events
2009	2011	Health Act	Vending machines (adverts on and sale from)
2009	2012	Health Act	Large shops and supermarket open displays
2009	2015	Health Act	Small shops open displays
2015	2016 (sell through period till 2017)	Children and Families Act	Packaging

With so few advertising options available, the tobacco industry was forced to rely on the use of glitzy, eye-catching packaging to attract new young smokers, a strategy that was prohibited through the introduction of plain packaging in 2016.^{10 11 12} Following a 12-month transition period, during which previously manufactured non-standardised packs could be sold, it was not until May 2017 that there was a full ban on non-standardised packs.

For further information, please see the [ASH Briefing on Standardised Packaging](#).

Impact of tobacco advertising

There is a long-standing, well established relationship between tobacco advertising and consumption.^{13 14 15 16} A UK Government commissioned review of the evidence conducted as early as 1992 found that *“The balance of evidence supports the conclusion that advertising does have a positive impact on consumption.”* The same review also found that in countries that had banned tobacco advertising the ban *“was followed by a fall in smoking on a scale which cannot reasonably be attributed to other factors.”*¹⁷

An international overview of the effect of tobacco advertising bans on tobacco consumption concluded that *“a comprehensive set of tobacco advertising bans can reduce tobacco consumption but a limited set of advertising bans will have little or no effect.”*¹⁸ This is because tobacco companies respond to partial bans by diverting resources from restricted media options to non-restricted media avenues.

There is extensive evidence that children and young people are highly receptive to tobacco advertising and that young people exposed to tobacco advertising and promotion are more likely to take up smoking.^{19 20 21 22 23 24} Research suggests that very young children understand that tobacco promotion is promoting smoking rather than a particular brand and that as they get older they can differentiate the brand messages.^{25 26}

Research conducted after the Tobacco Advertising and Promotion Act 2002 was introduced showed that young people’s awareness of tobacco marketing declined significantly following the ban.²⁷ Smoking rates amongst young people have continued to fall since restrictions on tobacco advertising were introduced.^{28 29}

Government Strategy

The then government held a public consultation in 2008 on the future of tobacco control as a first step towards developing a new national tobacco control strategy.³⁰ The consultation included a range of measures designed to protect children from tobacco promotion. Two of these measures (a ban on the display of tobacco products in shops and a ban on tobacco vending machines) were included in the Health Act 2009.

In 2010, the Conservative-led Coalition Government published ‘A Tobacco Control Plan for England’, which included a commitment to implement the ban on tobacco sales from vending machines and ban the display of tobacco products at the PoS.³¹ The strategy also pledged to review the case for standardised packaging. In 2013, the Children and Families Act included provisions to enable the Government to introduce standardised packaging and the law subsequently came into effect in May 2016.³²

‘Towards a Smokefree Generation: a tobacco control plan for England’ was published by the Conservative-led minority Coalition Government in 2017.³³ The Plan includes a specific commitment to the continued use of mass media campaigns to promote smoking cessation and raise awareness of the harms of smoking.

Framework Convention on Tobacco Control (FCTC)

The FCTC, the world’s first global public health treaty, was adopted in 2003 and has

been ratified by 181 countries. The FCTC established a policy framework aimed at reducing the adverse social, health and economic impacts of tobacco.³⁴ Article 13 of the FCTC requires Parties to implement and enforce a comprehensive ban on tobacco advertising within five years of ratifying the FCTC.³⁵ As a Party to the FCTC, the UK is bound by this agreement. The FCTC defines tobacco advertising and promotion as “*any form of commercial communication, recommendation or action with the aim, effect or likely effect of promoting a tobacco product either directly or indirectly.*” The UK is largely compliant with the FCTC through a range of policies restricting the promotion of tobacco, culminating in the introduction of standardised packaging in 2016.

Vending machines

The sale of tobacco products from vending machines has been illegal in England since 2011.³⁶ Prohibition of the sale of tobacco products from vending machines was included as part of the Health Act 2009, following a consultation on the future of tobacco control. Prior to this, a 2006 survey of smoking among children in England had found that 14% of 11 to 15 year olds who smoked reported that vending machines were their usual source of cigarettes.³⁷ After the minimum age for purchasing cigarettes was raised from 16 to 18 in 2007, a study in which young people carried out test purchases of cigarettes from vending machines was conducted. The researchers found an almost two-fold increase in illegal sales of tobacco to minors from vending machines after the change in minimum age of sale.³⁸ This survey underlined the need for legislation banning the sale of cigarettes from vending machines.

For further information see the [ASH Briefing: Tobacco Vending Machines](#).

Tobacco Promotion at the Point of Sale

It has been illegal to display tobacco products at the PoS in the UK since 2012 for large shops and 2015 for small shops.³⁹ Research has shown that PoS displays have a direct impact on young people’s smoking.^{40 41 42 43 44}

In the past, tobacco companies exploited the lack of regulation of PoS promotions, using creative display techniques. These included back-lit gantries, specially-designed towers to highlight certain brands and other non-standard shelving to make brands stand out. Such practices are now illegal.

For further information see the [ASH Briefing: Tobacco Advertising at the Point of Sale](#).

Tobacco packaging as a form of promotion

Cigarette packaging is the most ubiquitous form of tobacco advertising globally.⁴⁵ Smokers are exposed to the company’s product branding every time they take out their pack (although not in countries with plain or standardised packaging laws). Tobacco companies invested considerable resources in making the packs as attractive as possible and frequently changed the designs, often producing ‘limited editions’ to coincide with anniversaries or other events.^{46 47}

The tobacco industry considered packaging to be their most effective marketing tool. At an industry conference in 1994 a PMI executive stated that "*(i)n the absence of any other Marketing messages, our packaging – comprised of the trademark, our design, color [sic] and information – is the sole communicator of our brand essence. Put another way – when you don't have anything else – our packaging is our Marketing.*"⁴⁸ Indeed, the Philip Morris 2016 Annual Report 'This Changes Everything' described the introduction of standardised packaging as "*one of the main long-term regulatory challenges.*"⁴⁹

Marketing experts concur with this assessment. Steven Greenland, Senior Lecturer in Marketing at the Swinburne University of Technology in Australia, states: "*For cigarettes, the pack is the brand. Multinational companies such as BAT spend millions developing the most effective pack designs that hold the greatest appeal to their target consumers ... While it is likely that people will always smoke, reducing cigarettes to a generic brand status with plain packaging will dramatically limit the capacity to market the product.*"⁵⁰

Standardised packaging

Standardised packaging, also known as plain packaging, refers to packaging where the attractive, promotional aspects (including logos and graphics) are removed, and the appearance of all tobacco packs on the market is standardised. This includes the shape and colour of the packaging and the typeface and colour of all text. Standardised packaging was introduced in the UK in 2016, despite legal efforts by the tobacco industry to overturn the legislation.



An independent review of the evidence by Sir Cyril Chantler found that "*branded packaging plays an important role in encouraging young people to smoke and in consolidating the habit.*"⁵¹ Sir Cyril concluded that "*standardised packaging, in conjunction with the current tobacco control regime, is very likely to lead to a modest but important reduction over time on the uptake and prevalence of smoking and thus have a positive impact on public health.*"

Initial evidence from Australia, the first country to introduce standardised packaging, suggested that it would contribute towards a reduction in smoking amongst adults.⁵²

Standardised packaging also prohibits tobacco industry attempts to utilise potentially misleading information on cigarette packaging.⁴⁵ Tobacco manufacturers have long used eye-catching colours as part of their non-standardised packs, to reinforce branding (such as the 'iconic' Marlboro Red packs) and sometimes infer safety through using lighter, more friendly colours. Coloured packaging has been a potent tool of the tobacco industry's attempts to manipulate consumers' perceptions of cigarettes throughout the years.⁵³

In a post-standardised environment, tobacco companies are having to rely on memorable or misleading descriptors to try and influence consumers. For example: research commissioned by ASH found that both adults and young people were more likely to rate products as lower tar or lower health risk if packs displayed the terms 'smooth', 'gold' or 'silver' than varieties of the same brand labelled as 'regular'.⁵⁴

Although descriptors such as 'light' and 'mild' are prohibited under EU law, manufacturers have responded by substituting these terms with words such as 'smooth' to distinguish one brand variant from another.

It is expected that standardised packaging regulations will increase the effectiveness of health warnings and reduce misconceptions about the risks of smoking.

For further information on this topic see the ASH Briefing: [Standardised Packaging](#) and the [Smokefree Action Coalition Briefing: Changes to tobacco packaging explained](#).

Tobacco advertising in the 21st century

In response to advertising restrictions, the tobacco industry has shifted its focus to 'below the line' marketing.⁵⁵ This typically includes packaging, public relations, sales promotions and trade discounts for the promotion of particular brands.²³ This latter technique, known as 'push promotion', involves advertising to sellers and wholesalers, giving retailers financial incentives and offering competitions and prizes around specific products. In the US, the industry has utilised marketing through bar and club promotions.^{56 57 58}

Smoking in the media

Despite guidelines issued by the British Board of Film Classification (BBFC) designed to limit children's exposure to smoking on screen,⁵⁹ smoking in films continues to be a major source of tobacco imagery. Tobacco industry documents show that tobacco companies actively place their products in films to increase exposure.⁶⁰ Many films that are popular with young people continue to include and glamorise smoking,⁶¹ and interviews with popular actors are frequently accompanied by photographs of them smoking.^{62 63}

International research shows that smoking on screen is linked to smoking uptake amongst young people.^{64 65 66 67} A report by the United States National Cancer Institute Monograph concluded that there was sufficient evidence to indicate a causal relationship between the portrayal of smoking in the movies and the uptake of smoking.⁶⁸

Smoking on TV, the internet and in music videos are also key sources of smoking imagery. Ofcom guidelines⁶⁹ effectively prohibit tobacco imagery in programmes targeted at children, but smoking continues to be widely shown in programmes watched by young people. It is also more difficult to monitor and regulate music videos and the internet, where smoking imagery among young, glamorous and aspirational people is prolific.

Direct marketing, online advertising and promotion

In response to the global spread of tobacco advertising bans, the tobacco industry has found innovative ways of promoting (and selling) its products.⁷⁰ One of these new approaches involves the use of the internet, which is largely unregulated and provides the tobacco industry with opportunities to market its products to a worldwide audience.^{71 72 73 74} 'Smokespots', a website owned by Imperial Tobacco which recommends places to smoke, has previously run a 2017 'Amnesty For Cigarettes' campaign, which encouraged smokers to trade in their cigarettes for an electronic cigarette (e-cigarette) sample.⁷⁵

Coupons also proved a popular method of engaging with customers, with one US study finding that 86.5% of tobacco industry mailings to customers contained a coupon offering a discount if used when purchasing a tobacco product.⁷⁶ In the UK, the use of promotional coupons was banned by the Tobacco Advertising and Promotion Act, although promotional inserts (within individual cigarette packets) were banned later on as part of standardised packaging legislation.

The distinction between market research and promotion is also becoming increasingly blurred, with research showing that tobacco companies now engage directly with potential customers by, for example, inviting comments on new pack designs.⁷⁷

Product innovation by the tobacco industry has also helped maintain and boost cigarette sales. One major innovation was with capsule cigarettes, where a capsule with flavourings is incorporated into the filter of a cigarette which can be crushed or clicked, to change the taste of the tobacco smoke. Capsule cigarettes were introduced in 2007 and have grown exponentially since then.⁷⁸ Changing the filter characteristics have enabled the tobacco companies to differentiate their products in a plain packaging environment.

Tobacco industry advertising around the world

As mentioned previously, article 13 of the FCTC requires Parties to implement and enforce a comprehensive ban on tobacco advertising within five years of ratifying the FCTC.³⁵ Despite this requirement, in some countries this ban is not fully enforced, leaving many still exposed to tobacco advertising. A 2015 study in which 11,842 individuals across 16 countries were interviewed found that in communities in low-income countries, 81 times more tobacco adverts were observed than in high-income countries.⁷⁹ That study concluded that tobacco marketing remains ubiquitous and is most common in low-income countries.

Tobacco advertising in the developing world has been found to influence the youth, reflecting the power of cigarette branding. A 2013 study looking at 5 and 6 year olds in Brazil, China, India, Nigeria, Pakistan and Russia found that overall: 68% of 5 and 6 year olds could identify at least 1 cigarette brand logo, ranging from 50% in Russia to 86% in China.⁸⁰

E-cigarettes

The EU Tobacco Products Directive, which came into force in 2016, restricts the promotion and advertisement of e-cigarettes in all EU Member States. Under this e-

cigarettes and refill containers cannot be directly or indirectly advertised or promoted:

- on TV or on-demand TV
- on radio
- through information society services (for example internet advertising and commercial e-mail)
- in certain printed publications (for example newspapers, magazines and periodicals)

This also prohibits e-cigarette product placement or any sponsorship promoting e-cigarettes on radio and TV programmes.⁸¹

In August 2018, the UK Science and Technology Committee published a report recommending that advertising restrictions on e-cigarettes should be reviewed to better reflect the evidence of the relative harms of e-cigarettes compared to regular cigarettes. The Committee also recommended that the prohibition on e-cigarette manufacturers “*making claims for the relative health benefits of stopping smoking and using e-cigarettes*” should be reviewed to better inform smokers about the health benefits of switching to e-cigarettes.⁸²

For further information on e-cigarettes see the [ASH Briefing on electronic cigarettes](#).

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