



Proposals and technical specifications for the use of warning messages on tobacco packages

Chafea Service Contract 20147102

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**Proposals and technical
specifications for the use of
warning messages
on tobacco packages**

Chafea Service Contract 20147102

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1) Background and context

This document is deliverable D6 for the contract 2014 71 02 concerning technical specifications for combined health warnings on tobacco packages. It provides a summary of the work carried out for the contract: the methods applied, any problems or limitations encountered, and proposed solutions.

The aim of the project is to provide the European Commission with proposals and technical specifications on the implementation of warning messages on tobacco packages, according to the provisions of the 2014 Tobacco Products Directive¹ (TPD), including the requirements set out in Chapter II 'Labelling and Packaging'. A transposition period of two years until May 2016 was foreseen in the TPD for Member States to bring national legislation into line with the revised Directive.

The work packages and deliverables under this contract have developed proposals for the size, shape and position of the warnings on smoked tobacco product packaging that will be used and respected by manufacturers and/or importers of these products throughout the EU.

This document describes the work in the order in which it was carried out, and is summarised below by work package.

The final version of the deliverables 2, 3, 4 and 5 are provided in the form of annexes:

- Overview of the most common or representative tobacco packages on the EU market (deliverable (D)2 / work package (WP) 1)
- Proposals for the position of warnings on roll-your-own (RYO) tobacco pouches (D3 / WP2)
- Technical specifications for combined health warnings (D4 / WP3)

These deliverables informed the following document to be used by manufacturers to assist when editing the combined health warnings, in discussion with Member States:

- Editing of combined health warnings on smoked tobacco packaging (D5 / WP4).

2) Methodology and delivery of the work

This section describes the methodology and work carried out for each work package. It presents the key operational/project challenges raised during the course of the project. Technical considerations, including those raised by industry and Member States during the consultation, are specified and addressed in detail in the D2, D3 and D4 reports.

The work was carried out from November 2014 to November 2015.

The urgency and important implications of the work required a high level of commitment and communication from both the consortium and DG SANTE/Chafea. To facilitate this, meetings were held at the inception, interim and final stages of the project as per the contract. In addition, regular communication took place by email and in phone and face-to-face meetings.

¹ http://ec.europa.eu/health/tobacco/docs/dir_201440_en.pdf

It should be noted that feedback and input from industry was significantly greater than expected, so the overview and analysis of packages was comprehensive and on a much larger scale than anticipated. The consortium responded by investing further resources in the project.

Consortium roles

The technical work was led by design and communications consultants Butcher & Gundersen, who have a broad experience in packaging design, as well as pack formats, print methods and substrates. They bring a 100% independent view as their clients do not include, and have never included, tobacco companies. All proposals and guidance given in this document and its annexes are therefore based on feedback from questionnaires and face-to-face interviews with the industry experts, as well as physical examination of pack samples supplied.

VVA Europe is an international consultancy providing economic, market and regulatory research and advice. They led on the industry and Member State consultation under Work Package 1.

An audit to compare the placement of warnings with third countries (Australia, Canada and Brazil) was carried by the academic team, led by Dr Crawford Moodie of the University of Stirling, along with two international experts, Professors David Hammond and Melanie Wakefield.

Overall coordination and management of the project and consortium, including liaising with DG SANTE and Chafea on contractual and finance matters, was provided by the EU public affairs and communications consultancy Burson-Marsteller Brussels.

The Smoke Free Partnership provided one day of consultation at the beginning of the project to advise the other consortium partners on the relevant articles of the TPD.

3) Deliverable 1: Inception report

The first deliverable was the inception report, which provided an updated methodology and work plan based on the kick-off meeting between the consortium, DG SANTE and Chafea.

4) Deliverable 2: Overview of the most common or representative tobacco packages

This work package aimed to provide a representative sample of different types/sizes of smoked tobacco products that will be allowed in Europe under TPD legislation, taking into account minimum warning sizes and provisions on packaging appearance. The overview takes the form of an audit of four product types currently available in Europe: cigarettes; roll-your-own (RYO); water-pipe; and 'other' (i.e. cigars, cigarillos, pipe tobacco & others).

Consultation of stakeholders was required, to determine the existing and novel packages that will be allowed on the market under the TPD. The information and analysis from the stakeholder consultation informed all the subsequent work packages.

The first part of the work package therefore included an extensive data collection exercise, beginning with two stakeholder surveys:

1 Public authority input

The aim was to gather information on public authority preferences regarding cessation information and location of tax stamps in each of the Member States. The distribution list for this survey covered the group of public authorities from all EU Member States and Norway. The initial email was sent out by DG SANTE and it included the questionnaire as well as an introductory email. Where required, follow-up was carried out with these authorities either to gather missing responses or to verify and complete information provided by industry regarding their country. The results of the public authority consultation are included in the D2 report (Annex 1).

2 Industry input

The aim was to collect information on packages currently on the market in the EU-28 for all four product categories. The objective of this survey of industry was to obtain:

- a) samples of actual packs allowed on the market under the new TPD or,
- b) (where such samples are not available) pictures/graphical representations or cutter guides of packs currently on the market, or
- c) (where neither a) nor b) are available) descriptions of package types including pack shape and dimensions, opening mechanism, materials used and any other relevant information.

The survey was distributed to industry by email², together with an introductory letter from DG SANTE, an introductory email and a questionnaire, all of which had been agreed with DG SANTE in the inception phase. The survey is included in an appendix to the D2 report. It explains that all information provided will be used only for the purpose of this study and further work by DG SANTE, and it will not be disclosed unless there is a legal obligation to do so.

The industry survey was very successful: 40 responses were received by email. Considering this positive response and cooperation, it was agreed with DG SANTE that the team would analyse the information received via email and request samples of actual tobacco packages from the industry stakeholders who had responded to the survey, to be sent by mail. A total of over 735 packs were received.

The second part of the work package consisted of the initial analysis of data gathered through the surveys. All responses were compiled into a single Excel spreadsheet for analysis and cross-comparison. In addition, all samples, pictures and cutter guides received were reviewed to identify major differences across the different product categories and pack types. The results of this analysis are included in the D2 report.

The third and final part of the work package consisted of face-to-face interviews with a selection of industry representatives from an initial selection of 9 companies.

In each case, representatives of the company included colleague(s) with technical understanding, so that the print and production details provided in their questionnaire could be discussed in more detail.

² All communication with industry stakeholders has been fully documented to ensure full transparency in communications. All email communications were made using a dedicated address: warnings@tpdconsortium.eu.

As well as discussing points and details raised in their completed questionnaires, the companies were asked specific questions regarding details of print and production processes, how packs (specifically RYO) were merchandised, their understanding of consumer behaviour and 'rituals' when opening packs and using the products, current sizes of Tax Stamps and methods (and accuracy) of application onto packs, feedback on the technical standards produced for the previous TPD (prior to 2014) and their thoughts on the 25 packs selected as most common and representative. Those companies who indicated in their questionnaire that they produce/manufacture waterpipe products were also asked to provide additional references and samples, if there were other pack types available that had not already been covered.

Following the face-to-face interviews, each company was sent notes of the meeting for their agreement. Once agreed, the notes, which were to be kept confidential as requested by industry, were sent to DG SANTE.

A meeting with stakeholders to provide further industry feedback was carried out for the D4 report and took place in April 2015.

The key results of the industry consultation are provided in the D2 report.

3 Typology and analysis of packages

An initial breakdown and segmentation was made of the different pack shapes, sizes and formats for each of the four product categories, based on the industry questionnaire and support photographs supplied by most of the companies surveyed. Due to the large number of completed questionnaires received, it was possible to get a good indication of the range of packs available throughout Europe.

It was decided to request pack samples from the industry in advance of any face-to-face meetings, to determine the exact size of packs that had been photographed, how they are constructed, how the opening mechanism worked and the quality/type of printing methods used. After a meeting with stakeholders in April 2015, some companies also submitted additional packs, which were evaluated but not considered to add anything new that would require a change to the selection described below. No novel pack types were provided by industry.

Selection of 25 common and representative packs for further analysis

Due to the huge amount of pack types provided by the industry, both as photographs and/or physical samples (over 735), a systematic approach was taken to categorise packs, so they could be segmented by type. All packs were coded to identify the company that had provided them and they were then segmented firstly by product category, then pack type, then by material/substrate and finally by size/shape.

After this segmentation process, packs were identified as the most common or representative in the market by product category. Where a large variety of package types were found to be available on the market for a particular product, a representative sample of at least the ten most common types compliant with the new TPD per category was included.

Due to the wide range of packs identified in the overview by Product Category, a core set of 25 of these packs were then selected for further analysis.

Because the industry will ultimately need to implement the TPD across a broad range of pack types, shapes, sizes etc., it was important that this core set of packs did not just represent the most standard and 'straightforward' packs for consideration (and

illustrative purposes), but covered as much diversity as possible, to ensure that the designs and layouts would cover a wide range of package types and so that indications of how to implement the TPD on many different package types could be elaborated.

As an experienced packaging agency, Butcher & Gundersen therefore considered all shapes and sizes and selected a core set of packs that should provide enough coverage of the market, since it would be impractical to cover every pack type available.

The core packs were therefore selected to offer a range of different sizes/shapes (taking into account the most common, as well as the tallest, shortest, widest, narrowest, squarest etc.); opening mechanism; material/substrate; printing/production process. Some packs were selected not because they were necessarily the most common, but because they presented challenges in how the warnings could be applied, that would not necessarily be tackled on any of the other selected packs.

The D2 report presents the selection of most common or representative packs: 8x Cigarettes; 5x Roll-your-own; 2x Waterpipe; 10x Other (cigar, cigarillo, pipe).

Each pack was then considered in detail, with an analysis made on opening/closing mechanisms, substrates and print/production methods, to gain a better understanding on how the implementation of the new technical specifications might impact the industry. This also took into account the positioning of Tax Stamps (following the initial three year exemption period), where applicable. This analysis of package types is reported under D2 and D4.

5) Deliverable 3: Proposals for the position of warnings on RYO tobacco pouches

The aim of this work package was to propose options for the precise position of the general warning (GW) and the information message (IM) on roll-your-own (RYO) tobacco marketed in pouches, taking into account the different pouch types and shapes, and feedback gathered for D2. This information will assist the Commission in its implementation of Article 9(6) of the TPD.

D2 established that there are 3 different key types of RYO pouches available:

1. Wrap-around pouch with flap
2. Flat bottomed pouch with flap
3. Standing pouch

Within each category, there are variants in size, substrate and production method, as detailed in the D3 report. As a result of this, a further (10th) meeting was arranged with a European manufacturer of RYO tobacco pouches, to ensure a good understanding of the print and production constraints of these products and substrates. Any potential issues regarding existing substrates and printing methods were then highlighted in the D3 report, particularly with regard to ink migration and the restrictions of monofilm and laminate pouches.

For each pouch type, at least 2 options for the position of the GW and IM were proposed and compared.

Where possible, alternative solutions for the GW and IM were created, taking into consideration the different surface areas of the pouch as well as the issues raised regarding the restrictions of some printing methods and substrates.

For all wrap-around pouches with flaps, proposals were based on a pouch with an extended flap, since the analysis of pack samples and feedback from the industry indicated that it is likely that this will be necessary to accommodate a combined health warning (CHW) that covered 65% of the front and back of the pouch.

Initial proposals for the positioning of the GW and IM were shared with DG SANTE in the WP1 Review Meeting, taking into account the specific characteristics of the three different key pack types identified – shape, format, flaps, sealing options, substrates and printing methods. Feedback from that meeting was then incorporated into the final proposals.

In each case, proposals were visualised on a black and white line drawing. To further illustrate each proposal when sharing with DG SANTE, warnings were affixed to physical pouch samples to show the proposed positions of the warnings.

Once the proposals had been established, an evaluation was then made for each proposal and, where applicable, different options compared to highlight advantages and disadvantages of each option with regard to the dimensions and visibility of the warnings. Following feedback from the industry during WP1 and subsequent conversations throughout WP2, the impact of the position of the warnings on existing printing methods (and substrates used) was also highlighted for each proposal.

The preferred proposals and evaluation of each, including of the estimated impact on production, were presented to the Member States at the 2nd Meeting of the Expert Group on Tobacco Policy on 13 March 2015 as agreed with DG SANTE.

The recommended options are presented in the Conclusions to the D3 report (Annex 2).

6) Deliverable 4: Technical specifications for combined health warnings

This work package looked at the design detailing for each type of combined health warning (CHW) and the creation of agreed specifications in line with TPD legislation, to inform the implementing act on the design of combined health warnings (TPD Article 10(4)).

All options took into account the 25 different pack types identified for D2, details of Tax Stamps and cessation information provided in the public authority consultation, as well as the warning placements for RYO pouches established for D3. Feedback from the stakeholder questionnaires and face-to-face interviews regarding different substrates and production processes was also taken into consideration. Additional questions were asked of the industry where technical clarification was required and a further (11th) meeting was arranged in April with a European manufacturer of tinned tobacco, to ensure a good understanding of the print and production constraints of this substrate.

The considerations for each of the 25 pack types are detailed in the D4 report, as well as an overview of print and production constraints, and any concerns raised by the industry. An audit of smoked tobacco product warnings on packs from 3 other jurisdictions – Australia, Canada and Brazil – was also carried out.

An initial design exploration stage by Butcher & Gundersen established the basic principles on which the concepts would be based, such as typeface, balance of image versus message and preferred options for colour and incorporation of cessation information. The distribution of text versus picture, colour of text and similar features used on warnings in the 3 other jurisdictions that were analysed was also taken into account.

Butcher & Gundersen's recommendations were then shared with DG SANTE, prior to the creation of 13 proposals for the design of the CHW, which were based on the basic principles for most legible typeface, preferred options for the position of cessation information and most impactful and relevant colours. Each proposal was visualised on a rectangular format, similar to the size and shape that would appear on a flip-top cigarette pack, using one consistent warning message and its accompanying image, in English language.

The 13 design concepts were reviewed with the wider consortium team, including the international experts, and DG SANTE. Two preferred concepts were selected and visualised across a further 5 shapes and illustrated using alternative warnings messages, images and languages.

After a further round of consultation, one agreed concept was selected as the design for the CHW.

Because of the different shapes and proportions of the 25 pack types identified, as well as the allowance for the CHW on the front of flip-top cigarette packs to be split if required, different layouts of the agreed concept were finalised to allow for the CHW to be implemented across the different pack types identified. Two core layouts were created, one where the image is positioned above the message/cessation information panel (stacked) and one where the image is to the left of the message/cessation panel (side by side). Exception layouts were also created to allow for the CHW to be split on the front of flip-top cigarette packs, as well as a version for extra wide warning shapes.

The final CHW warning design and layouts were then implemented across all 25 packs (using one combined health warning message for illustration purposes) and visualised on black and white 3D pack visuals, so that the impact of the position, shape, size and design/style of the warning messages could be fully appreciated. The 25x 3D visuals also indicated the position of the Tax Stamp, once the initial 3 year transitional period had expired.

Feedback from the preliminary positionings of the combined health warning, shared with the Expert Group on Tobacco Policy on 13 March, was also incorporated.

A workshop with tobacco companies and manufacturers was held in Brussels in April, to present the findings of D3 and D4 to the industry and gather their feedback, primarily on the technical specifications for combined health warning, prior to the completion of the D5 editing document.

Key considerations highlighted by industry and Member States during consultation, and proposed solutions, are summarised in the Conclusions to the D4 report (Annex 3).

7) Deliverable 5: Editing of combined health warnings on smoked tobacco packaging

The outcomes from Deliverables 2-4 were used to inform the D5 editing document (Annex 4), clearly describing the proposed layout and design of combined health warnings (CHW) on tobacco products for smoking. The document is intended to assist manufacturers when discussing with Member States, according to the Tobacco Products Directive 2014/40/EU (TPD) and Commission Implementing Decision on the technical specifications for combined health warnings.

The content of the editing document was based on the technical specifications agreed in WP4 for the design of CHW. It was assumed that the document would be used by designers, artworkers and printers, as reference to the new style of CHW, and was therefore created in a similar style to standard brand guideline documents, commonly used in the design industry.

The document was created in a landscape format, for both screen and printed use, with bulleted instructions and supporting imagery for quick reference. Where applicable, correct and incorrect applications of the new CHW (dos & don'ts) were shown, to help identify common issues that could arise.

Reference was provided for the layout of each of the 14 warnings, illustrated across 5 different shapes, in both single and multiple languages, as an example of how the warnings might differ depending on the proportions of the warning, the length of message(s) and how the image might be cropped and/or scaled.

On-pack examples were also provided to illustrate how the CHW might be positioned on each of the 25 packs identified in WP1. These examples also indicated the suggested position of Tax Stamps, following the expiry of the transitional period. The position of GW and IM (Article 9) were not included as part of this document.

The editing document was not intended to be exhaustive, but to provide further details on the design and layout of CHW, as specified in the Commission Implementing Act, and to provide examples of how the warnings could be applied to different pack types and shapes, in accordance with the TPD.

A draft of the editing document was shared with both the Member States and some industry representatives for their feedback and where relevant, the editing document was updated to incorporate their comments.

Annex 1

D2 report:

Overview of the most common or representative tobacco packages

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1. Introduction

This document is deliverable D2 for the contract 20147102 concerning technical specifications and guidelines for the use of warning messages on tobacco packages.

The aim of the project is to provide the European Commission with proposals and technical specifications on the implementation of warning messages on tobacco packages, according to the provisions of the Tobacco Products Directive¹ (TPD), including the requirements set out in Chapter II 'Labelling and Packaging'. The purpose is to develop proposals that clearly specify the size, shape and position of the warnings on smoked tobacco product packaging that will be used and respected by manufacturers and/or importers of these products throughout Europe.

It should therefore be noted that the work in this report consists of proposals to the European Commission.

This document presents the results of work package 1: overview of the smoked tobacco packages that will be allowed in the EU according to TPD legislation.

The document is structured as follows:

- Section 2 presents the methodology undertaken to collect and present information under work package 1;
- Section 3 presents a typology of different packages, graphical representations and narrative descriptions by type and tobacco category; and
- Section 4 derives conclusions from work package 1 and implications for the remainder of the project.

2. Methodology

This section presents the methodology for work package 1 of the above contract.

The objective of the work package is to provide an overview of different types/sizes of smoked tobacco products that will be allowed in Europe under TPD legislation, taking into account minimum warning sizes and provisions on packaging appearance. The overview has taken the form of an audit of four product types currently available in Europe: cigarettes; roll-your-own (RYO); water-pipe; and 'other' (i.e. cigars, cigarillos, pipe tobacco & others).

The first part of the work package included an extensive data collection exercise comprising two stakeholder surveys:

1. A survey of industry to collect information on packages currently on the market in the EU-28 for all four product categories. The objective of this survey of industry was to obtain:
 - i. samples of actual packs allowed on the market under the new TPD or,

¹ http://ec.europa.eu/health/tobacco/docs/dir_201440_en.pdf

- ii. (where such samples are not available) pictures/graphical representations or cutter guides of packs currently on the market, or
- iii. (where neither a) nor b) are available) descriptions of package types including pack shape and dimensions, opening mechanism, materials used and any other relevant information.

The survey was distributed to industry by email², together with an introductory letter from the Commission, an introductory email and a questionnaire, all of which had been agreed with the Commission in the inception phase. The survey is included in this report at Annex 3.

On the whole, the online industry survey was very successful: 38 responses were received by email and no reminders needed to be sent. Considering this positive response and cooperation, it was agreed with the Commission that the team would analyse the information received via email (see Section 4 of this report) and request samples of actual tobacco packages from the industry stakeholders who had responded to the survey, to be sent by mail. The list of companies and organisations contacted can be found in Annex 4.

In addition, it was agreed that physical meetings with industry would take place following submission of this report.

2. A survey of public authorities to gather information on public authority preferences regarding cessation information and location of Tax Stamps in each of the Member States. The distribution list for this survey covered the group of public authorities from all EU Member States, contact details for which are available to the Commission. The initial email was sent out by the Commission via the TPD CONSORTIUM email address and it included the questionnaire as well as an introductory email. Where required, further telephone follow-ups can be carried out with these authorities either to gather responses from the 4 missing EU Member States or to verify and complete information provided by industry regarding their country.

The second part of the work package consisted of the initial analysis of data gathered through the surveys. All responses were compiled into a single Excel spreadsheet for analysis and cross-comparison. In addition, all samples, pictures and cutter guides received were reviewed to identify major differences across the different product categories and pack types. The results of this analysis are included in the present report. Specifically, this includes the inventory of packs (see Section 5) and graphical representations for 25 of the most common pack types relevant to the technical editing document to be produced as a result of this project (see Sections 5.2-5.26).

The third and final part of the work package consisted of face to face interviews with a selection of industry representatives (up to 15). The objective of these meetings was to:

- Present the typology of most common pack types per product category to ensure that this is sufficiently complete for the purpose of informing the technical editing

² All communication with industry stakeholders has been fully documented to ensure full transparency in communications. All email communications were made using a dedicated address: warnings@tpdconsortium.eu.

document. It should be noted that the aim is not to have a complete picture of all packs but only the 25 most common and relevant for such a document;

- Discuss individual survey responses with companies to clarify and complete any fields where additional detail is required; and
- Enable companies to provide additional information on their survey response which they consider relevant to the technical editing document.

It should be noted that almost all industry survey respondents expressed an interest in attending such interview meetings.

3. Key results of public authority consultation

This section summarises the results of the survey of public authorities. The analysis is structured by question area in the questionnaire.

As of 1 May 2015, the team had received 28 responses. One response was from Norway and the remaining from 27 EU Member States (i.e. all except Italy). A follow-on email was sent to non-respondents and a further invitation to respond will be issued during the Member State Expert Group meeting on March 13.

Based on the survey responses, 6 Member States do not use tax stamps whereas other Member States do.³ Where tax stamps are used, public authorities confirmed that they must be affixed in a manner that requires them to be torn or broken when the pack is opened. Where a cellophane wrapper is used around the pack, the tax stamp must be affixed underneath the cellophane. Annex 1 presents the detailed responses from each Member State that replied to the survey.

As for cessation information, data was provided by different Member States about the details to be included and the preferred format. In many cases, Member States had not yet made a decision on either details or format of cessation information under the new TPD.

Finally, regarding the combined warnings editing document, the vast majority of authorities stated that there had been no compliance issues and that they were not aware how the document is used by industry.

However, one Member State stated that previously, there had been problems with marking tobacco (hookah tobacco, bidies), which were offered in shops selling oriental goods and where warnings were often missing. But, according to the authority, the situation has improved since importers (sellers) now understand that these products should be labelled in accordance with the requirements of the relevant national legislation.

In another Member State, the following compliance issues were observed

- Packs of slim cigarettes are so thin it is not practical to put the TNCO declaration parallel to the top of the package.
- There is no specific definition for the front and back side of fine-cut smoking tobacco pouches, which results in differences in placement of the specific health warnings.

³ It should be noted that the UK uses a fiscal mark rather than a tax stamp.

- Circular canisters are being used more and more for fine-cut smoking tobacco and it is not clearly defined how to decide which is the front and back side of these packages. The specific health warnings are placed at random.
- Cigars are sometimes sold individually in (metal) tubes, here also the front and back side is not clearly defined and the specific health warnings are placed randomly.
- Looking at fine-cut smoking tobacco sold in pouches, the pouch is sometimes not closed correctly. This results in placement of the health warning on top of the pouch instead of on the front/back side and coverage of the declared values by the coloured end piece of the closing tape

One Member State noted that according to the report of the national authority for inspection, in 2014 there was only 1 case of inappropriate labelling of a tobacco product. In previous years, inappropriate labelling was also very infrequent and compliance with the current requirements is very good.

However the authority points out that initially, just before implementation of combined health warnings (CHWs), there were some difficulties:

- The font type used in the text of the CHWs did not allow the use of language specific letters. So, the font type had to be modified
- The length of the phrase in their language was significantly longer than in English. Thus, the image has to be decreased.

In one Member State, court cases exist regarding mainly lack of warnings but also for example warnings in other languages than the official language and warnings with spelling mistakes. Also there have been some implementation issues regarding ambiguity of required language at for example tax free shops at airports etc. and some issues of stickers not being irremovable. Also there have been some issues regarding: placement of warnings on cylindrical boxes without hinged lid for snus and cylindrical packets for single cigars; the application of the exception of warnings on additional transparent wrappers, on other transparent material, such as plastic bags; and too small a font size to occupy the greatest possible proportion of the area set aside for the warning.

In another Member State, the authority indicates that there have been isolated cases where manufacturers did not display any of the required picture warnings on the cigarette pack and enforcement officers regularly find niche tobacco products without appropriate labelling (health warnings).

With regard to the existence of guidelines to retailers on how to display products, most authorities stated that they had no evidence for this and in some countries display of tobacco products is illegal so the issue does not arise. Two authorities provided additional detail:

One public authority stated that the person responsible for the sale of the products visits the outlets and provides instructions on setting up the product on the shelves. Some written instructions and warnings are delivered to the Management as well. However, given that the display of tobacco products at point of sale is forbidden (except in duty-free shops), it is in the interest of the producers to work in accordance with legal requirements so that sellers are not punished due to non-compliance.

One Member State stated that there are no legal, written proofs about the existence of retail guidelines from manufacturers. Instead, retailers speak about the existence of “oral” indications and, in the case of big retailers (restaurants, clubs, gas stations, etc.) the advertising contract provides specifications for merchandising promotional objects. While such contracts are confidential, the introduction of guidelines for presentation / merchandising of tobacco products should be taken into consideration to avoid warnings / images not being shown on display.

4. Key results of industry consultation

4.1. Industry questionnaire

This section presents the key results of the questionnaire answered by tobacco and packaging companies. It concentrates on the most relevant aspects of the survey and aims to outline its main findings. The respective tables are followed by brief paragraphs to summarise the results and put them in context where necessary.

Table 4.1: In how many EU Member States is the company active? (29 tobacco companies, 6 packaging-only companies)

Type of company	Survey result
Tobacco-only companies	The majority of tobacco-only companies are active in all or more than 20 EU Member States. Only one company is active in less than 10 countries in delivery of products.
Packaging-only companies	The majority of packaging-only companies produce in 5 to 7 countries. Most of them deliver to all or the majority of EU Member States.
Tobacco/Packaging companies	The companies involved in both tobacco and packaging are mostly active in all or the majority of EU countries.

Table 4.1 demonstrates the companies’ widespread and cross-border activity across the EU market. The majority of tobacco companies are active in all or more than 20 EU countries and only a small fraction of them concentrate their business on few selected national markets. Whereas packaging firms seem to limit their production to a small number of countries, most of them distribute their products to all or the majority of EU states, too. Supplying tobacco companies with a wide range of different types of packaging, they are upstream actors within the EU-wide value chain of the tobacco industry.

Table 4.2: Type of packages used by tobacco companies for CIGARETTES (13 companies)

Type of package	Survey result	Popularity ranking
Flip-top boxes	Most common package type, used by 13/13 companies.	1
Shoulder hinged boxes	Used by 8 companies.	3
Soft packs (box)	Used by 9 companies.	2
Pouches with flap	<i>Not used by respondents.</i>	
Standing pouches	<i>Not used by respondents.</i>	
Cylinder	<i>Not used by respondents.</i>	
Wooden boxes	<i>Not used by respondents.</i>	
Boxes (other)	Used by 2 companies.	
Tins	Used by 3 companies.	
Outer packaging (e.g. cartons) in which products are placed on the market (please specify types)	9 companies use outer packaging such as polypropylene wrap, transparent film, display cartons, multi packs, end labels for bundles, closing stamps.	2
Other (specify)	<i>Not used by respondents.</i>	

Table 4.2 underlines the dominant position of flip-top boxes in cigarettes packaging. Soft packs, shoulder hinged boxes and outer packaging types are also very common. It is to be noted that many companies are using a wide range of different forms (SKUs) of the package types listed for their individual packaging.

Table 4.3: Type of packages used by tobacco companies for CIGARS (20 companies)

Type of package	Survey response	Ranking
Flip-top boxes	Used by 4 companies.	
Shoulder hinged boxes	Used by 14 companies.	3
Soft packs (box)	Used by 2 companies.	
Pouches with flap	<i>Not used by respondents.</i>	
Standing pouches	<i>Not used by respondents.</i>	
Cylinder	Used by 4 companies.	
Wooden boxes	Most common packaging type, used by 19/20 companies.	1
Boxes (other)	Used by 12 companies.	
Tins	Used by 8 companies.	
Outer packaging (e.g. cartons) in which products are placed on the market (please specify types)	Used by 15 companies.	2
Other (specify)	12 companies use other packaging types such as tubes, bundles etc.	
Slide-and-Shell carton	Used by 8 companies.	

Table 4.3 shows the wide range of packaging used by companies for cigars. Beginning with the mostly used wooden boxes, all types except pouches with flap and standing pouches are used by the companies. Their quantitative distribution is relatively wide-spread, from 19 companies using wooden boxes to 2 companies with soft packs in their portfolio. Often used packaging

types include other kinds of boxes, tins, tubes, bundles, shoulder hinged boxes and slide-and-shell cartons.

Table 4.4: Type of packages used by tobacco companies for CIGARILLOS (17 companies)

Type of package	Survey response	Ranking
Flip-top boxes	Used by 10 companies.	2
Shoulder hinged boxes	Most common packaging type, used by 11/17 companies.	1
Soft packs (box)	<i>Not used by respondents.</i>	
Pouches with flap	Used by 1 company.	
Standing pouches	<i>Not used by respondents.</i>	
Cylinder	<i>Not used by respondents.</i>	
Wooden boxes	Used by 6 companies.	
Boxes (other)	Used by 8 companies.	
Tins	Used by 10 companies.	2
Outer packaging (e.g. cartons) in which products are placed on the market (please specify types)	Used by 10 companies.	2
Other	Used by 1 company (sachet / shell and slide)	

Similar to cigar packaging, **Table 4.4** reveals a relatively manifold range of packages used by companies for cigarillos. Shoulder hinged boxes are the mostly used type in this survey, closely followed by flip-top boxes, tins and different varieties of outer packaging which are all mentioned equally often.

Table 4.5: Type of packages used by tobacco companies for RYO (19 companies)

Type of package	Survey response	Ranking
Flip-top boxes	<i>Not used by respondents.</i>	
Shoulder hinged boxes	<i>Not used by respondents.</i>	
Soft packs (box)	Used by 1 company.	
Pouches with flap	Most common packaging type, used by 16/19 companies.	1
Standing pouches	Used by 10 companies.	
Cylinder	Used by 12 companies.	2
Wooden boxes	Not used by companies.	
Boxes (other)	Used by 3 companies.	
Tins	Used by 6 companies.	
Outer packaging (e.g. cartons) in which products are placed on the market (please specify types)	Used by 10 companies.	3
Other	Used by 6 companies (bucket, shaped composite cans, compound foil bags)	

As can be seen in **Table 4.5**, many different packaging types are used by companies for roll-your-own tobacco (RYO), too. Pouches with flap, outer packaging (e.g. polypropylene or paper wrapping) and cylinders are the dominant forms here, but also standing pouches, tins or other forms (e.g. buckets) are among the common products indicated by the surveyed companies.

Table 4.6: Type of packages used by tobacco companies for PIPES (15 companies)

Type of package	Survey response	Ranking
Flip-top boxes	<i>Not used by respondents.</i>	
Shoulder hinged boxes	Used by 1 company.	
Soft packs (box)	<i>Not used by respondents.</i>	
Pouches with flap	Most common packaging type, used by 12/15 companies.	1
Standing pouches	Used by 4 companies.	
Cylinder	Used by 7 companies.	
Wooden boxes	Used by 1 company.	
Boxes (other)	Used by 2 companies.	
Tins	Used by 11 companies.	2
Outer packaging (e.g. cartons) in which products are placed on the market (please specify types)	Used by 9 companies.	3
Other	Used by 1 company (not specified)	

Table 4.6 demonstrates the leading role of pouches with flap and tins in packaging for pipe tobacco. However, many of the companies do also rely on cylinders and use a wide range of outer packaging forms such as plastic, transparent film and different kinds of wrapping. Only flip-top boxes and soft packs are not used. However the quantitative distribution among the remaining types of packaging is not as wide-spread as is the case for cigars (see above).

Table 4.7: Type of packages used by tobacco companies for WATERPIPE (4 companies)

Type of package	Survey response	Ranking
Flip-top boxes	Used by 1 company.	
Shoulder hinged boxes	<i>Not used by respondents.</i>	
Soft packs (box)	<i>Not used by respondents.</i>	
Pouches with flap	Used by 1 company.	
Standing pouches	<i>Not used by respondents.</i>	
Cylinder	Used by 1 company.	
Wooden boxes	<i>Not used by respondents.</i>	
Boxes (other)	Used by 2 companies.	2
Tins	Used by 1 company.	
Outer packaging (eg cartons) in which products are placed on the market (please specify types)	3/4 companies use other packaging types, such as cartons.	1
Other (specify)	Used by 1 company (buckets).	3

Table 4.7 demonstrates how few companies produce or manufacture packaging for waterpipe. From the 4 companies that do provide waterpipe tobacco, boxes and outer packaging (cartons) are most common, whilst buckets were also provided as accompanying photographs.

Table 4.8: Production-specific questions: Printing

Item	Survey response
Printing methods	The most common printing methods among the companies questioned are: Lithography offset, Flexography, Gravure and Screen Printing.
Printing tin/metallic	Most producers apply a sheet printing method and, depending on the type of packaging, curved surface printing and labeling techniques.
Colour of original substrate	Most companies print on a white substrate. Whereas the colour also depends on the type of substrate, it is mostly a single-colour surface that is printed on.
Substrate	Most common substrates are paper (coated or uncoated), thin card, cardboard.
Underprinting	Many companies have to underprint white, but this depends on the packaging type, substrate and colours used.
Colours used	The number of colours used by the companies differs greatly between 3 and "infinite".

Regarding the production-specific questions of the survey, **Table 4.8** shows that packaging producers are mostly relying on lithography offset, flexography, gravure and screen printing. The application of other printing methods such as curved surface printing and different labeling techniques depends on the substrate that is printed on (e.g. paper or metallic, card or tin etc.). The most common substrates are paper, thin card or cardboard, and the majority of companies print on white or otherwise single-colour substrates. Whereas underprinting needs depend on the type of packaging and the colours involved, it is interesting to note the big difference in the number of colours actually used by the companies. This ranges from only 3 to an 'infinite' amount of colours at disposal.

4.2. Industry interviews

Face-to-face interviews were held in Brussels and London throughout January, February, March and April with representatives from 11 companies/associations (JTI, PMI, Imperial Tobacco, BAT, ESTA, Scandinavian Tobacco Group, Tobacco Manufacturers' Association of Denmark, ECMA, AGIO Cigars, Schur Flexibles and Hoffmann).

In each case, the key representative of the company was joined by a colleague(s) with a more technical understanding, so that the print and production details provided in their questionnaire could be discussed in more detail.

As well as discussing points and details raised in their completed questionnaires, the companies were asked specific questions regarding details of print and production processes, how packs (specifically RYO) were merchandised, their understanding of consumer behaviour and 'rituals' when opening packs and using the products, current sizes of Tax Stamps and methods (and accuracy) of application onto packs, feedback on the technical standards produced for TPD I and their thoughts on the 25 packs selected as most common and representative. Those companies who indicated in their questionnaire that they produce/manufacture waterpipe products were also asked to provide additional references and samples, if there were other pack types available that had not already been covered.

Minutes were taken throughout all meetings, but industry representatives requested that these were kept confidential and only shared with the Commission. However, the following points summarise the feedback from the meetings held:

- **Selection of 25 representative packs:** In principle, all companies interviewed were happy with the packs selected as the most common or representative (though 10 were felt to be too few to cover the whole cigar, cigarillo and pipe industry)
- **Printing capabilities for RYO in pouches:** Numerous companies raised the issue of ink migration if printing on the inside of flap on RYO pouches in one or two layer laminate (since this surface is used to portion/roll) and inside of standing pouches & cylinders, which could potentially cause product integrity issues. At the same time, several companies indicated that they are aware of at least one RYO pouch – Lucky Strike - which is (or was until recently) on the market in Europe and which had printing on the inside of the flap. In addition, most companies agreed that ink migration is not an issue for pouches that use paper inserts. The **cost and environmental implications of printing on the inside of the flap** in RYO pouches was raised by numerous companies.
- **Tax Stamps** were a large focus of discussion due to their size, production implications of them having to be applied around a 'bend', tolerances for accurate application, cost of 'lost' stamps, possibility of orientating cylinders for application, flat 'landing zones'.
- All companies raised the tight timeline and **cost implications** to implement the new TPD.
- Some specifically requested certain elements ASAP, such as general warning in each language, details of cessation information requirements, confirmation of placement of warnings (even if the graphics aren't finalised), PSD files, technical specifications, confirmation of GW choice by MS.

- **Waterpipe:** Some additional feedback was provided regarding Waterpipe tobacco – packaging in general is the same as that used for RYO, but folding boxes & buckets are probably the most common. The landscape folding box is probably the only format that is unique to the Waterpipe sector.
- **Technical specifications:** Discussion was held around the current technical specifications of CMYK & 133 lines per inch – whether this provided enough direction; whether it was achievable in Flexoprint (specifically for RYO Standing pouches)
- **Irremovable stickers:** It was highlighted that the use of **stickers** was not always the ‘easier’ option, particularly on cylinder lids, extra large format cigar boxes (due to bubbling), inside of hinged boxes (due to the lip).
- **Logistical issues** were raised by all, in particular difficulties in sourcing equipment on time from the limited number of suppliers of machinery to the tobacco sector. This was felt to be a particular issue for smaller companies and companies in the ‘other category’ (cigars, cigarillos, pipe), should MS opt not to apply Article 11.

Issues specific to smoked tobacco products other than Cigarettes and RYO:

- **Article 11:** Because MS have the option of implementing Article 11 or Articles 9 and 10, this sector will have to allow for both routes.
- **Logistics:** Minimum order quantities, batch production and pre-packaging of some products will have a knock on effect of how Articles 9 and 10 can be applied (where required by the MS). This is due to the fact that the smaller volumes of such products (in comparison to Cigarettes and RYO) may mean that production has to be significantly adjusted in order to apply warnings in numerous languages, and the associated costs for such small batches may be prohibitive.

Additional input will be sought as required over the remainder of the project and in a meeting scheduled for April 2015.

5. Typology of packages by type and tobacco category

5.1. Overview of the typology

The Typology table below shows the findings from the different types of packs indicated by the industry. The table has been compiled based on both the feedback from the industry questionnaires (responses from 38 companies), as well as physical samples sent by 26 of those companies, a total of over 735 packs.

An initial breakdown and segmentation was made of the different pack shapes, sizes and formats for each of the four product categories (cigarettes; RYO; waterpipe and other e.g. cigars, cigarillos and pipe), based on the completed tables in page 2 of the industry questionnaire, as well as support photographs supplied by most of the companies surveyed.

Some companies provided far more detail in their responses, providing good sized, full colour photography of packs closed, open and at different angles with accompanying descriptions, annotations and/or cutter guides, whilst others only provided small thumbnails, which in some cases, were only black and white and very hard to decipher. However, due to the large number of completed questionnaires received, it was possible to get a good indication of the range of packs available throughout Europe, which will still be compliant once the TPD is implemented in May 2016.

What was difficult to gather in some cases was the exact size of packs that had been photographed, how they are constructed, how the opening mechanism worked and the quality/type of printing methods used, meaning that we did not feel that we had a complete enough 'picture' of the market as a whole. It was therefore decided to request pack samples from the industry in advance of any face-to-face meetings, to allow time for analysis, segmentation and assimilation with the findings already gathered from the questionnaires.

Selection of the most common or representative packs

Due to the huge amount of pack types provided by the industry, both as photographs and/or physical samples (over 735), a systematic approach was taken to categorise packs, so they could be segmented by type.

1. Initially, packs were segmented by **Product Category** e.g. cigarettes, RYO, waterpipe, cigar, cigarillo, pipe. Where a product fell into more than one category (e.g. pipe, RYO), it was included in the category under which the stricter TPD obligations applied.
2. Within each Product Category, packs were then segmented by **Pack Type** e.g. flip-top packs, standing pouches, boxes etc.
3. Once packs had been categorised by Product Category and Pack Type, they were then segmented by **Material/Substrate** e.g. paper, cardboard, wood, plastic, so that different print and production methods were covered in the final selection of common or representative packs.
4. Packs were then segmented by **Size/Shape**, to:
 - a. highlight the most common types versus those that appeared to be specific to a particular company and therefore not representative of the market as a whole.

- b. indicate the most common non-standard packs (e.g. largest, smallest, widest, narrowest), to ensure that proposals in WP2 and WP3 for the position of warnings take into consideration the variety of common shapes and sizes available on the market in Europe.
- c. identify and remove packs that would not be compliant under the new TPD.

After this segmentation process, the packs shown in the table below were identified as the most common or representative in the market by Product Category. Where a large variety of package types were found to be available on the market for a particular product, a representative sample of at least the ten most common types compliant with the new TPD per category has been included.

After the April stakeholder meeting, some companies submitted additional packs, which were evaluated but not considered to add anything new that would require a change to the selection.

Table 5.1 Overview of the most common or representative packs (x48)
(Please note, of these 48 packs, 25 were selected as a broad representation of the different pack types available on the market across all sectors, and these are highlighted in bold and blue)

Cigarettes (x10)	
Flip top box, square corner (standard size)	Shoulder hinged box (rectangular)
Flip top box, square corner (wide pack)	Shoulder hinged box (square)
Flip top box, square corner (extra tall pack)	Soft pack
Flip top box, bevel corner/octagonal (tall pack)	Outer packaging (flip top multi pack)
Flip top box, rounded corner	Outer packaging (shoulder hinged multi pack)

Roll-your-own (RYO) (x10)	
Pouch with flap, standard	Cylindrical bucket
Pouch with flap, flat bottomed	Cuboid can, hinged lid
Standing pouch	Cuboid bucket
Cylinder, card (Medium)	Block/Foil pack
Cylinder, card (short)	Outer display

Waterpipe (x7)	
Carton box (portrait, tuck top)	Cylindrical bucket
Pouch with flap, flat bottomed	Cuboid can, hinged lid
Standing pouch	Cuboid bucket
Cylinder, card (Medium)	Block/Foil pack

Other (x22)	
Hinged box, card (<i>cigar; cigarillo</i>)	Flip top pack (<i>cigarillo</i>)
Hinged box, wood (<i>cigar; cigarillo</i>)	Soft pack (<i>cigarillo</i>)
Hinged box, tin (square) (<i>cigarillo; pipe</i>)	Single tube, tin (<i>cigar</i>)
Hinged tin, upright (<i>cigarillo</i>)	Bundle (<i>cigar</i>)
Cylinder, tin (<i>cigar; cigarillo</i>)	Multi cigar tube, plastic (<i>cigar</i>)
Round tin (<i>pipe</i>)	Standing pouch, roll-fold (<i>cigar; pipe</i>)
Rectangular tin (<i>pipe</i>)	Flow wrap (<i>cigar; cigarillo</i>)
Shoulder hinge box, card (<i>cigarillo</i>)	Folding pouch (<i>pipe</i>)
Shoulder hinge box, plastic (<i>cigarillo</i>)	Slide-lid box, wood (<i>cigar; cigarillo</i>)
Shell/Hull & Slide box, card (<i>cigar; cigarillo</i>)	Multi-pack display, for tubes (<i>cigar</i>)
Folding box, card (<i>cigar; cigarillo</i>)	Multi-pack display (<i>cigar; cigarillo</i>)

Selection of 25 common and representative packs for further analysis

Due to the wide range of packs identified in the overview by Product Category, a core set of 25 of these packs were then selected for further analysis.

Because the industry will ultimately need to implement the TPD across a broad range of pack types, shapes, sizes etc., it is important that this core set of packs does not just represent the most standard and 'straightforward' packs for consideration (and illustrative purposes), but covers as much diversity as possible, meaning less ambiguity and less need for interpretation by the industry for the implementation of warnings.

As an experienced packaging agency, Butcher & Gundersen therefore considered all shapes and sizes that would provide enough guidance for implementation within each region.

The core packs were therefore selected to offer a range of different:

- sizes/shapes (taking into account the most common, tallest, shortest, widest, narrowest, squarest etc.)
- opening mechanism
- material/substrate
- printing/production process.

The pack types highlighted in **blue & bold** in the table above indicate the 25 core packs we have selected for further analysis in **section 5.2 Most common or representative packs**:

- 8x Cigarettes
- 5x Roll-your-own
- 2x Waterpipe
- 10x Other (cigar, cigarillo, pipe)

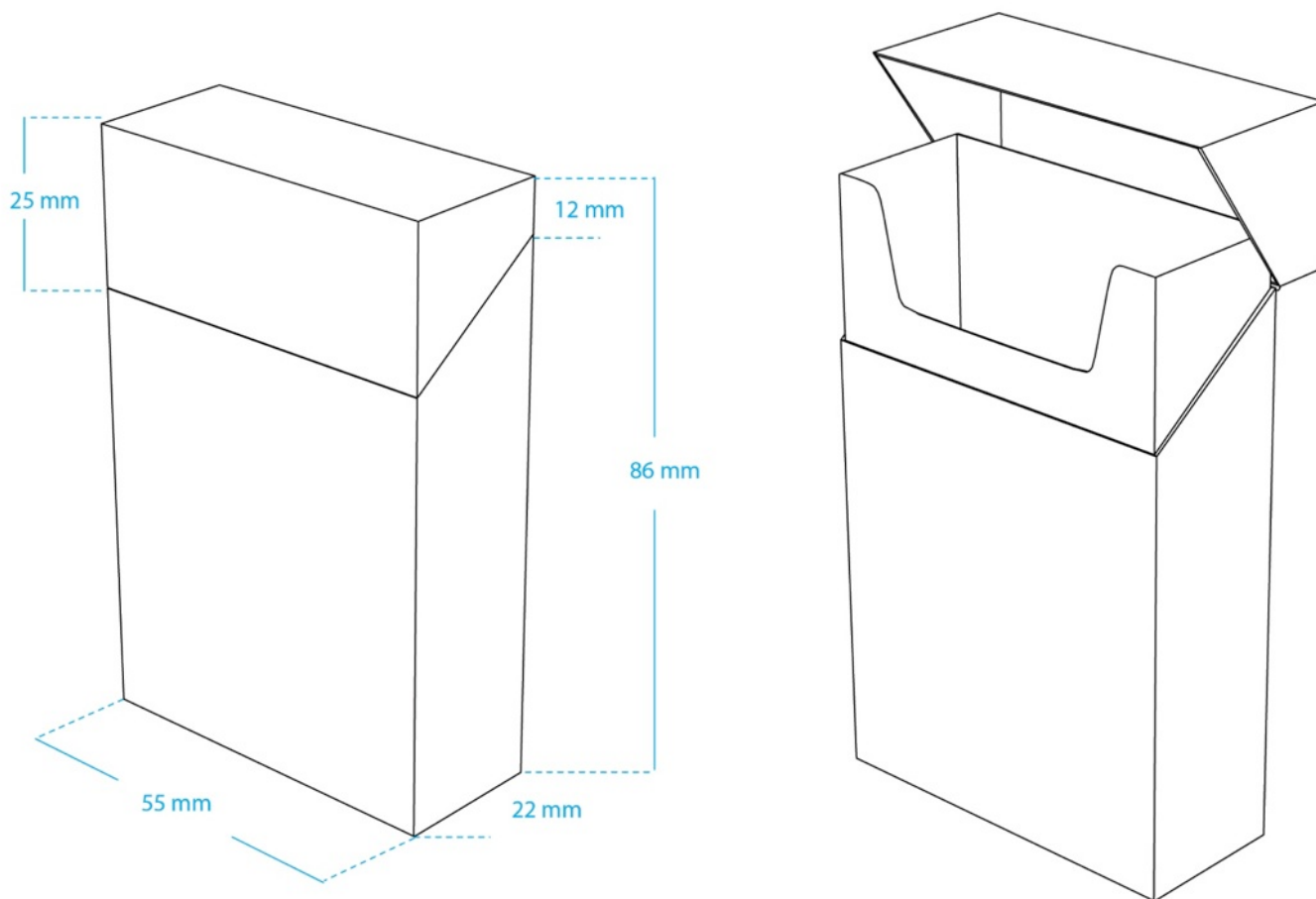
Key challenges and issues that need to be considered

Following the in-depth review of available packs and subsequent selection of the 25 core packs analysed on the following pages, various key challenges were identified:

- **Front face and most Visible Surface** – in some cases it is unclear as to what one might consider to be the ‘front face’ (e.g. Cigarette Outer Cases) or ‘most visible surface’ (e.g. RYO pouches which roll folded) when applying warnings.
- **Transparent outers** – whilst these are not regarded as Outside Packaging in the TPD (Article 2:29) these wrappers are often part-printed, so they will need to be considered.
- **Self-adhesive tabs** – sometimes these re-sealable tabs (e.g. on RYO pouches) are printed with graphics, so they must not interfere with the warnings.
- **Quality of Flexography** – unknown as to whether Flexography printing can achieve the required Technical Specification minimum of 133 lines per inch.
- **Detail for ‘Full Regime’ if required on ‘other’ Products** – The Directive does not stipulate the exact position of the general warning and information message on other products.
- **Tax Stamps** – it is clear that in many cases, Tax Stamps will need to be repositioned and most likely produced in a different size and shape to ensure that they don’t overlap the warning messages. This is particularly the case with Flip-top Packs, Soft Packs, Pouches and Cylinders. (See detailed analysis in 5.2)

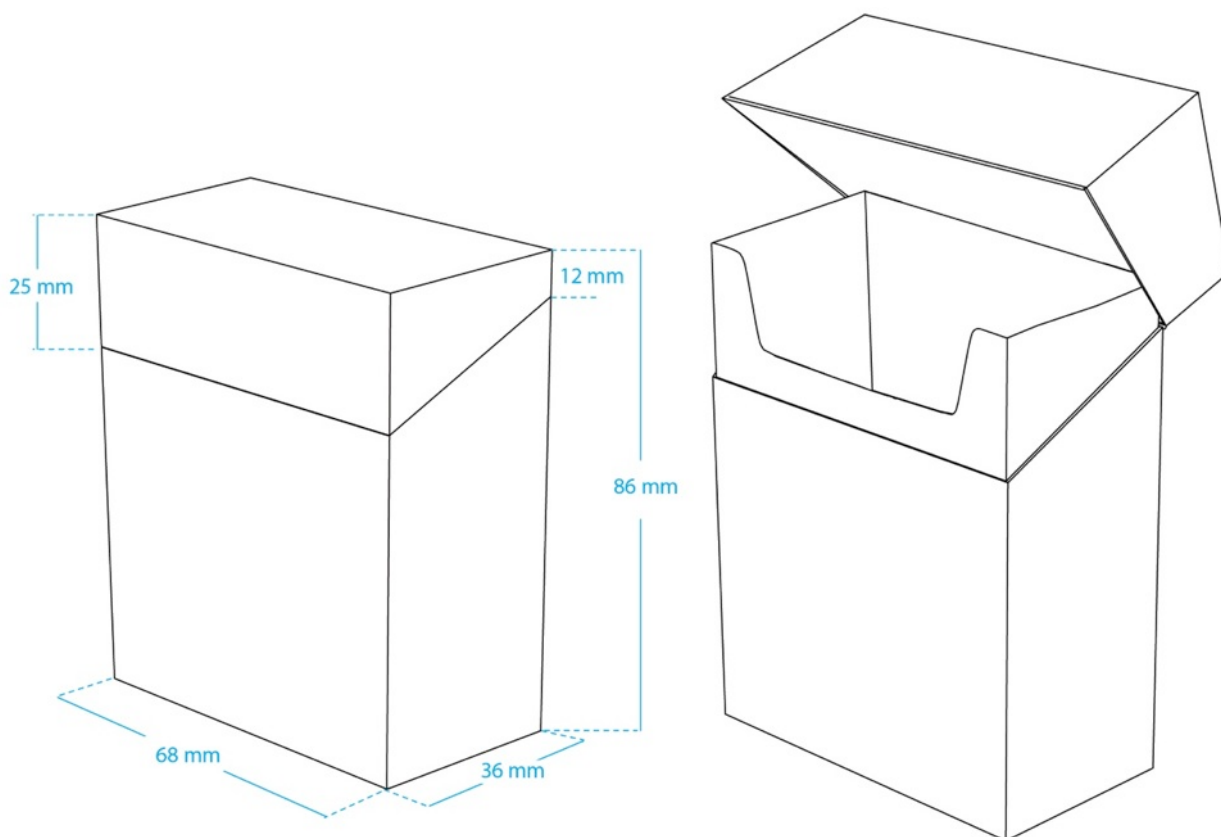
5.2. Most common or representative packs (x25)

5.2.1. Cigarettes – Type 1:



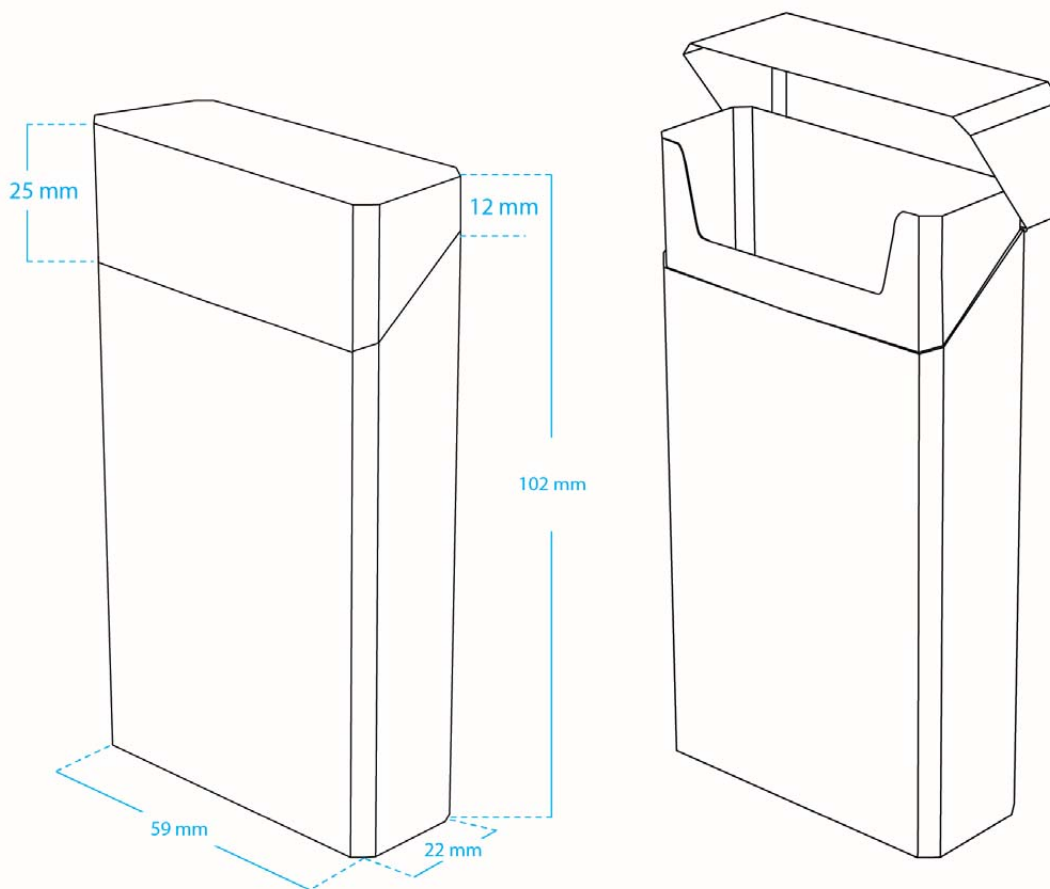
Cigarettes – Type 1: Flip top box, square corners (standard)			
Pack shape	Cuboid; square corners		
Example dimensions	Closed: W: 55mm x H: 86mm x D: 22mm <i>(example dimensions only)</i>		
Opening mechanism	Flip top		
Visibility of surfaces	<table border="0"> <tr> <td>Closed: All external faces visible</td> <td>In use: Top 20-30% of front, back & lateral surfaces broken</td> </tr> </table>	Closed: All external faces visible	In use: Top 20-30% of front, back & lateral surfaces broken
Closed: All external faces visible	In use: Top 20-30% of front, back & lateral surfaces broken		
Common materials/substrate	Folding Box Board (FBB); Solid Bleached Board (SBB); Cardboard; Metalised Cardboard (200-240gsm)		
Common production/printing process	Gravure (up to 10 colours); Lithography Offset (some CMYK only, others up to 6/8/10 colours)		
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Combined Warning will be split (front face) and creased (back face) when pack opened, so layout needs to be carefully considered to ensure that warning message is still clear. Transparent outer film is often printed too, so this must also follow guidance for warnings.		
Impact of new TPD on materials &/or production process	Tax Stamps may need to be repositioned when placed on lateral surfaces, so that they don't overlap any warning message on the front/back surfaces.		

5.2.2. Cigarettes – Type 2: Flip top box, square corner (wide, deep pack)



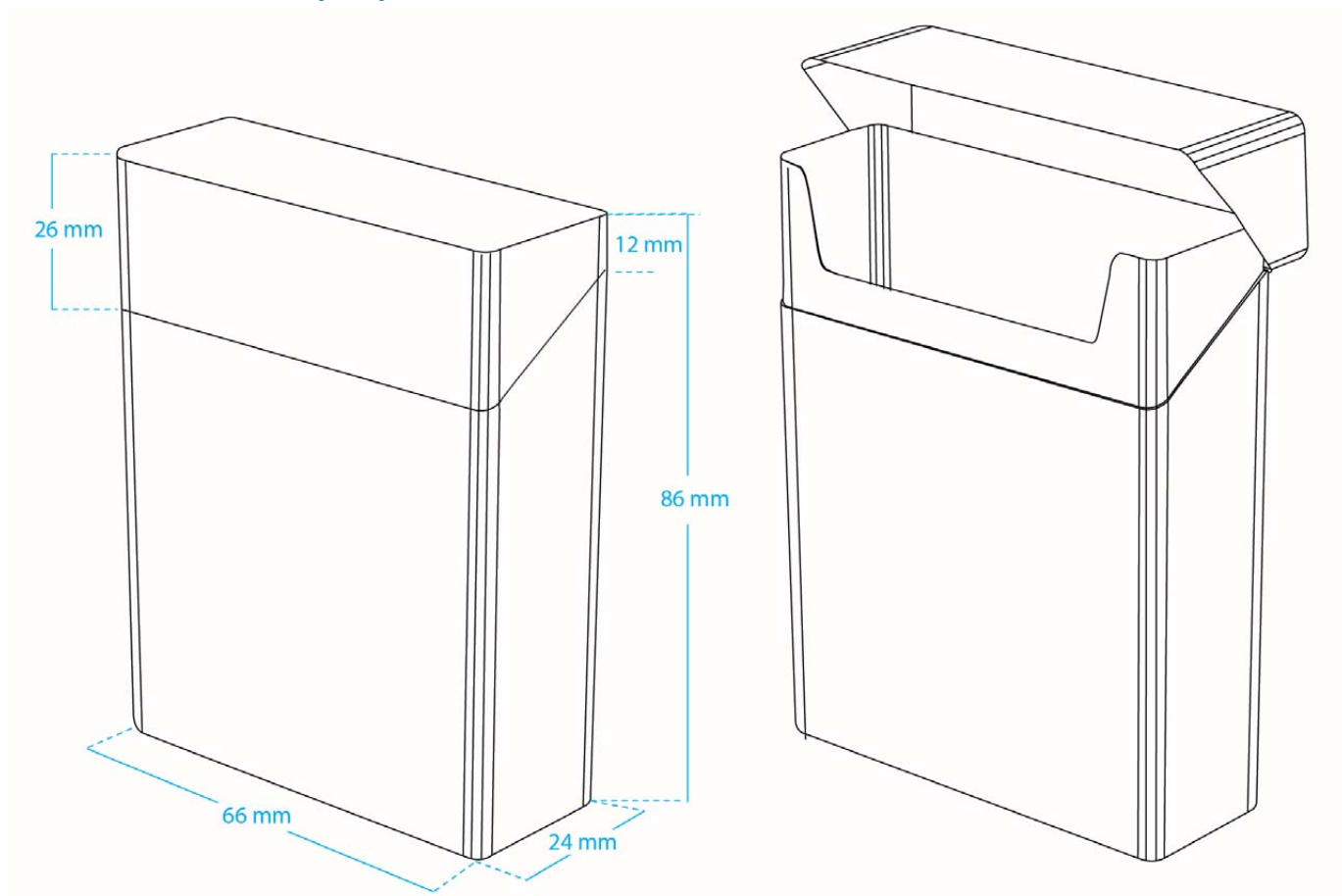
Cigarettes – Type 2: Flip top box, square corners (wide, deep pack)	
Pack shape	Cuboid; square corners
Example dimensions	Closed: W: 68mm x H: 86mm x D: 36mm <i>(example dimensions only)</i>
Opening mechanism	Flip top
Visibility of surfaces	Closed: All external faces visible In use: Top 20-30% of front, back & lateral surfaces broken
Common materials/substrate	Folding Box Board (FBB); Solid Bleached Board (SBB); Cardboard; Metalised Cardboard (200-240gsm)
Common production/printing process	Gravure (up to 10 colours); Lithography Offset (some CMYK only, others up to 6/8/10 colours)
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Combined Warning will be split (front face) and creased (back face) when pack opened, so layout needs to be carefully considered to ensure that warning message is still clear. Transparent outer film is often printed too, so this must also follow guidance for warnings.
Impact of new TPD on materials &/or production process	Tax Stamps may need to be repositioned when placed on lateral surfaces, so that they don't overlap any warning message on the front/back surfaces.

5.2.3. Cigarettes – Type 3: Flip top box, bevel corner/octagonal (tall pack)



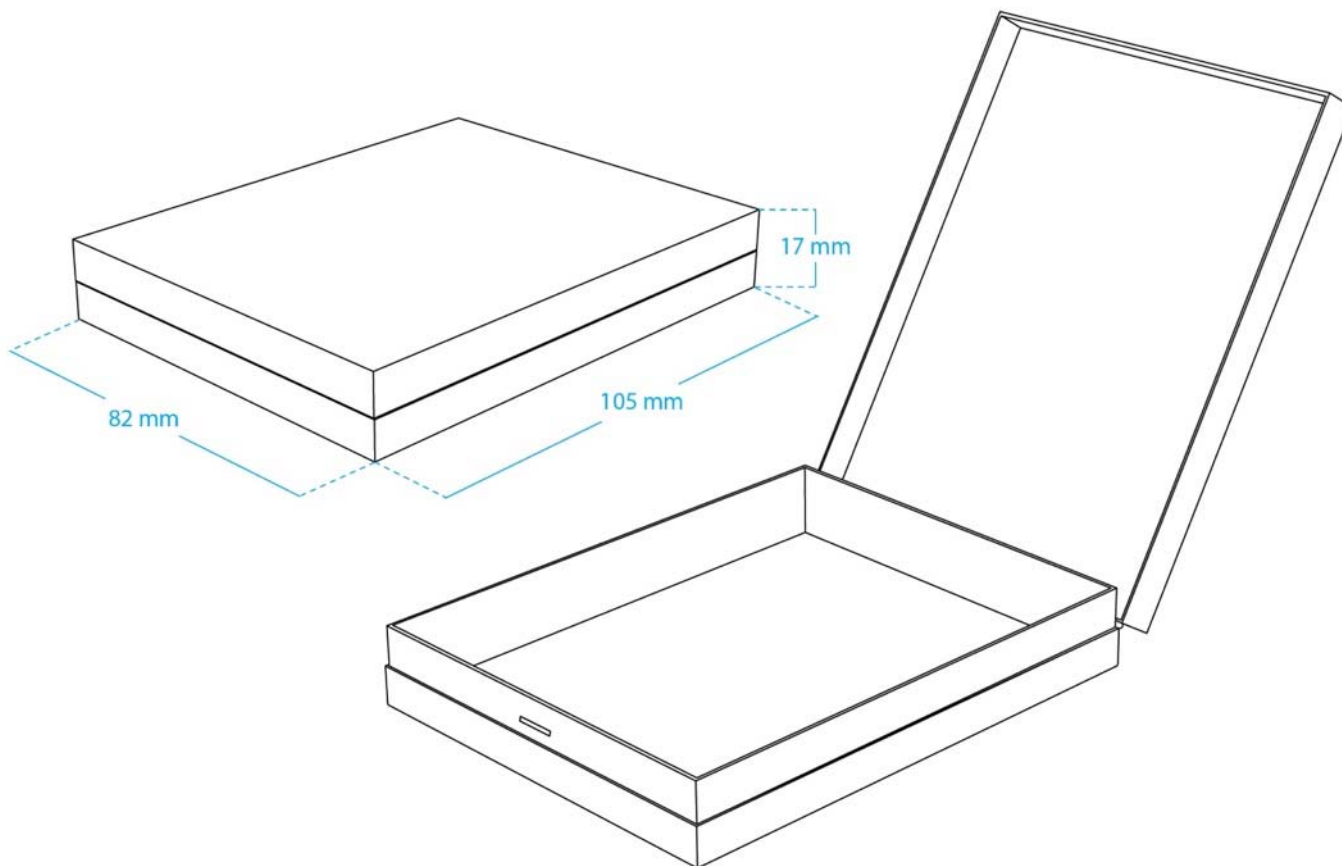
Cigarettes – Type 3: Flip top box, bevel corner/octagonal (tall pack)	
Pack shape	Cuboid with bevelled corners/octagonal
Example dimensions	Closed: W: 59mm x H: 102mm x D: 22mm <i>(example dimensions only)</i>
Opening mechanism	Flip top
Visibility of surfaces	Closed: All external faces visible In use: Top 20-30% of front, back & lateral surfaces broken
Common materials/substrate	Folding Box Board (FBB); Solid Bleached Board (SBB); Cardboard; Metalised Cardboard (200-240gsm)
Common production/printing process	Gravure (up to 10 colours); Lithography Offset (some CMYK only, others up to 6/8/10 colours)
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Combined Warning will be split (front face) and creased (back face) when pack opened, so layout needs to be carefully considered to ensure that warning message is still clear. Transparent outer film is often printed too, so this must also follow guidance for warnings. Need to take into account that the bevelled corners are not part of the front or back surfaces.
Impact of new TPD on materials &/or production process	Tax Stamps may need to be repositioned when placed on lateral surfaces, so that they don't overlap any warning message on the front/back surfaces.

5.2.4. Cigarettes – Type 4: Flip top box, rounded corner



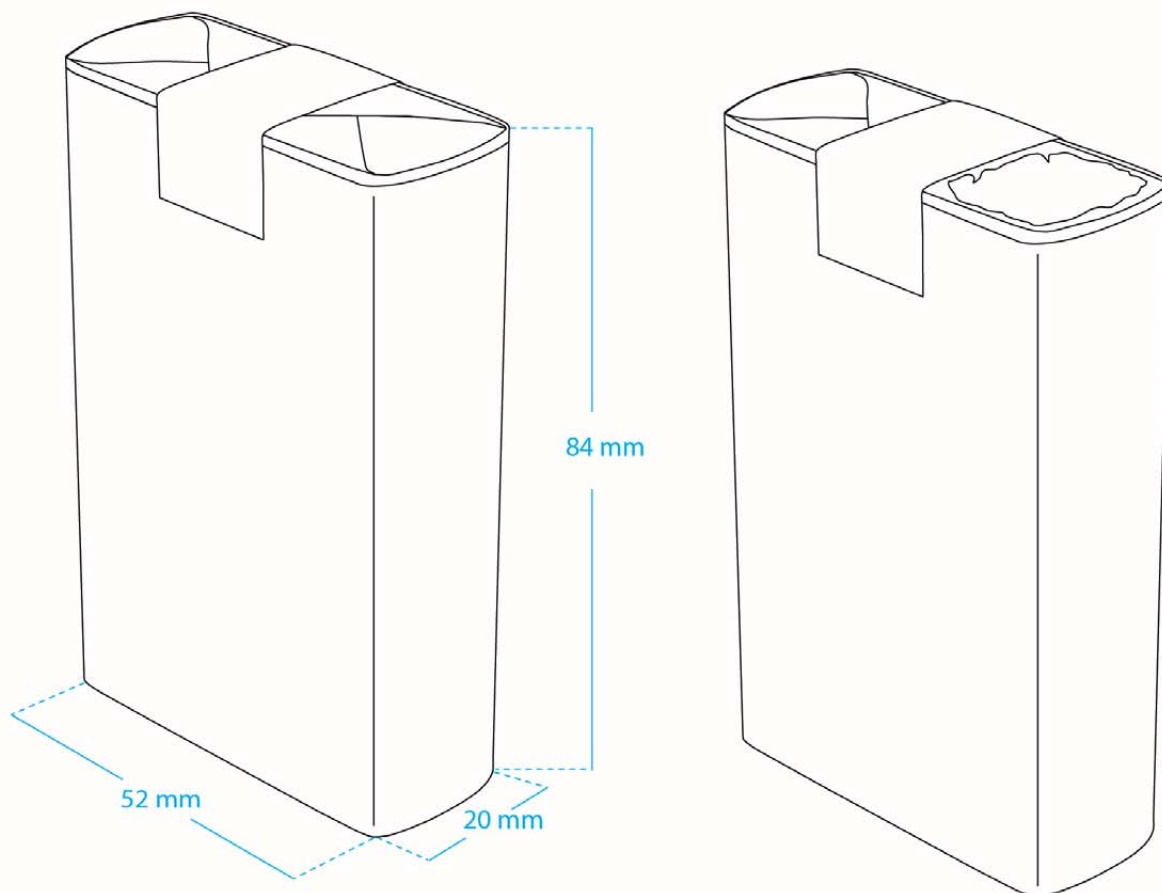
Cigarettes – Type 4: Flip top box, rounded corner			
Pack shape	Cuboid with rounded corners		
Example dimensions	Closed: W: 66mm x H: 86mm x D: 24mm <i>(example dimensions only)</i>		
Opening mechanism	Flip top		
Visibility of surfaces	<table border="0"> <tr> <td>Closed: All external faces visible</td> <td>In use: Top 20-30% of front, back & lateral surfaces broken</td> </tr> </table>	Closed: All external faces visible	In use: Top 20-30% of front, back & lateral surfaces broken
Closed: All external faces visible	In use: Top 20-30% of front, back & lateral surfaces broken		
Common materials/substrate	Folding Box Board (FBB); Solid Bleached Board (SBB); Cardboard; Metalised Cardboard (200-240gsm)		
Common production/printing process	Gravure (up to 10 colours); Lithography Offset (some CMYK only, others up to 6/8/10 colours)		
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Combined Warning will be split (front face) and creased (back face) when pack opened, so layout needs to be carefully considered to ensure that warning message is still clear. Transparent outer film is often printed too, so this must also follow guidance for warnings. Need to take into account that the rounded corners are not part of the front or back surfaces.		
Impact of new TPD on materials &/or production process	Tax Stamps may need to be repositioned when placed on lateral surfaces, so that they do not overlap any warning message on the front/back surfaces.		

5.2.5. Cigarettes – Type 5: Shoulder hinged box, (rectangular)



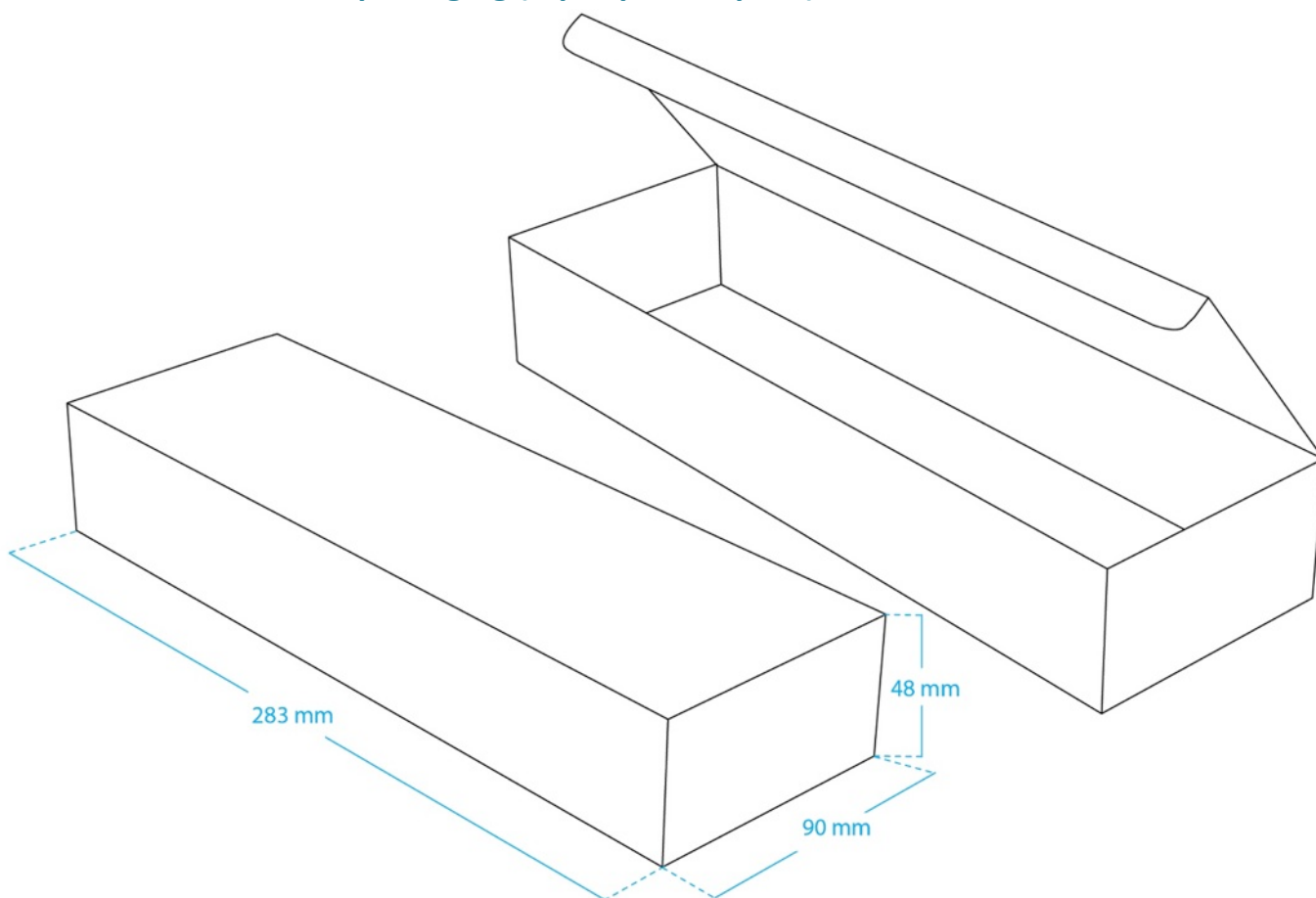
Cigarettes – Type 5: Shoulder hinged box (rectangular)	
Pack shape	Flat cuboid; square corners
Example dimensions	Closed: W: 82mm x H: 105mm x D: 17mm (<i>example dimensions only</i>)
Opening mechanism	Paper hinged lid with tab closure
Visibility of surfaces	<p>Closed: All external faces visible</p> <p>In use: Front face not visible; lateral surfaces split; inside lid now visible</p>
Common materials/substrate	Composite paper/cardboard (180-270gsm; 200-240gsm); FBB Board (200-270gsm); Paperboard/Paper Label (70-120gsm); Metalised Cardboard (240gsm)
Common production/printing process	Lithography Offset (some CMYK only, others from 6-11 colours); Gravure
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Lateral sides split when open, so General Warning & Information Message must appear in their entirety on the larger surface without breaking
Impact of new TPD on materials &/or production process	Tax stamps may need to be repositioned so not overlapping warnings on lateral sides

5.2.6. Cigarettes – Type 6: Soft pack



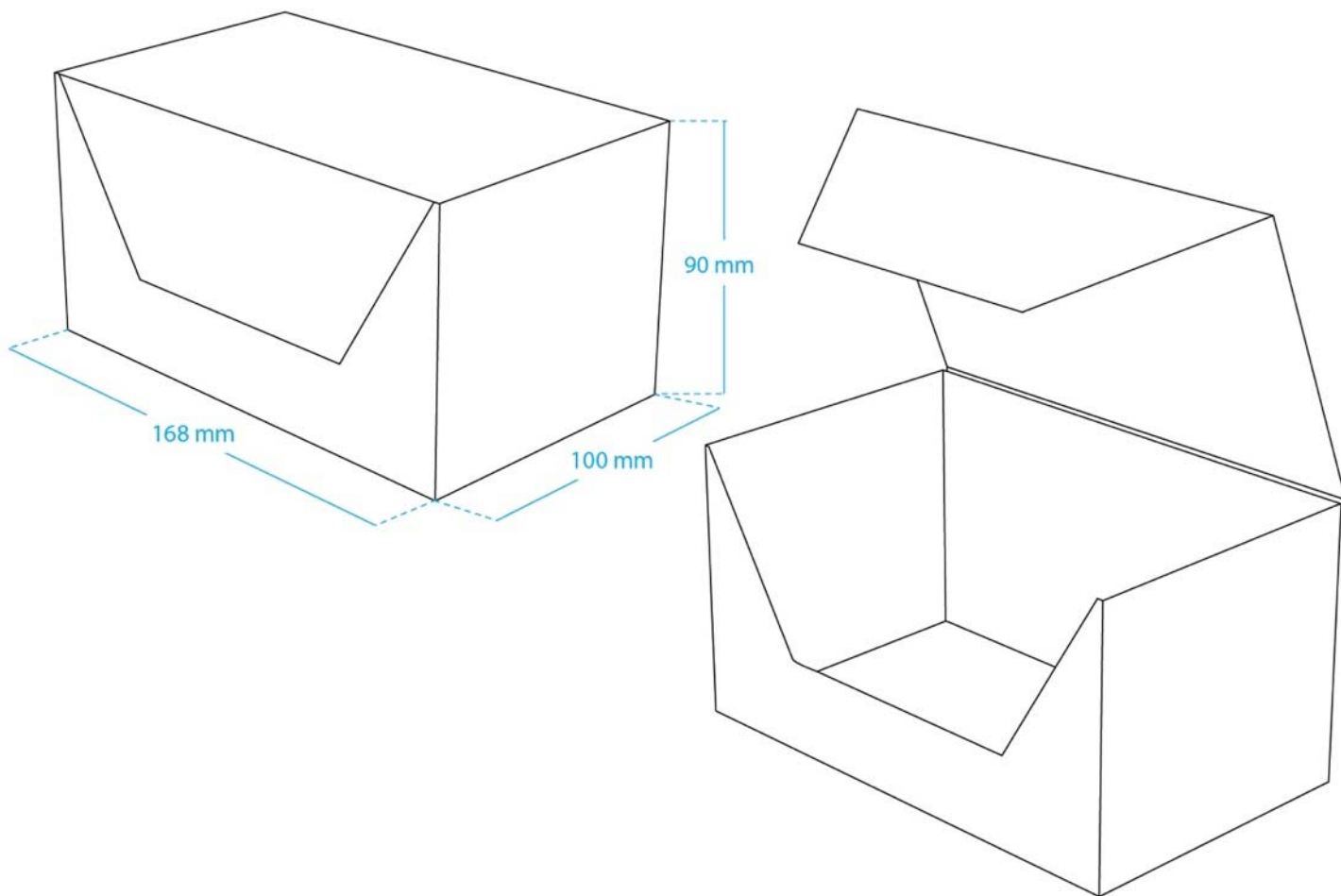
Cigarettes – Type 6: Soft pack	
Pack shape	Cuboid
Example dimensions	Closed: W: 52mm x H: 84mm x D: 20mm <i>(example dimensions only)</i>
Opening mechanism	Generally tear paper to one side
Visibility of surfaces	Closed: All external faces visible In use: All external faces visible
Common materials/substrate	Paper (80-120gsm); Coated paper (40-115gsm); Virgin Fibre Board (180-280gsm); Cardboard (180-270gsm)
Common production/printing process	Gravure (10 colours); Lithography offset (some only CMYK, others up to 6-10 colours); Flexography
How pack shape/size & opening mechanism might impact the visibility/position of warnings	All packs have a sticker (which is sometimes the Tax Stamp) to seal the top of pack, front to back, which may not be allowable within the new TPD.
Impact of new TPD on materials &/or production process	Tax stamps may need to be repositioned so not overlapping warnings.

5.2.7. Cigarettes – Type 7: Outer packaging (flip top multi pack)



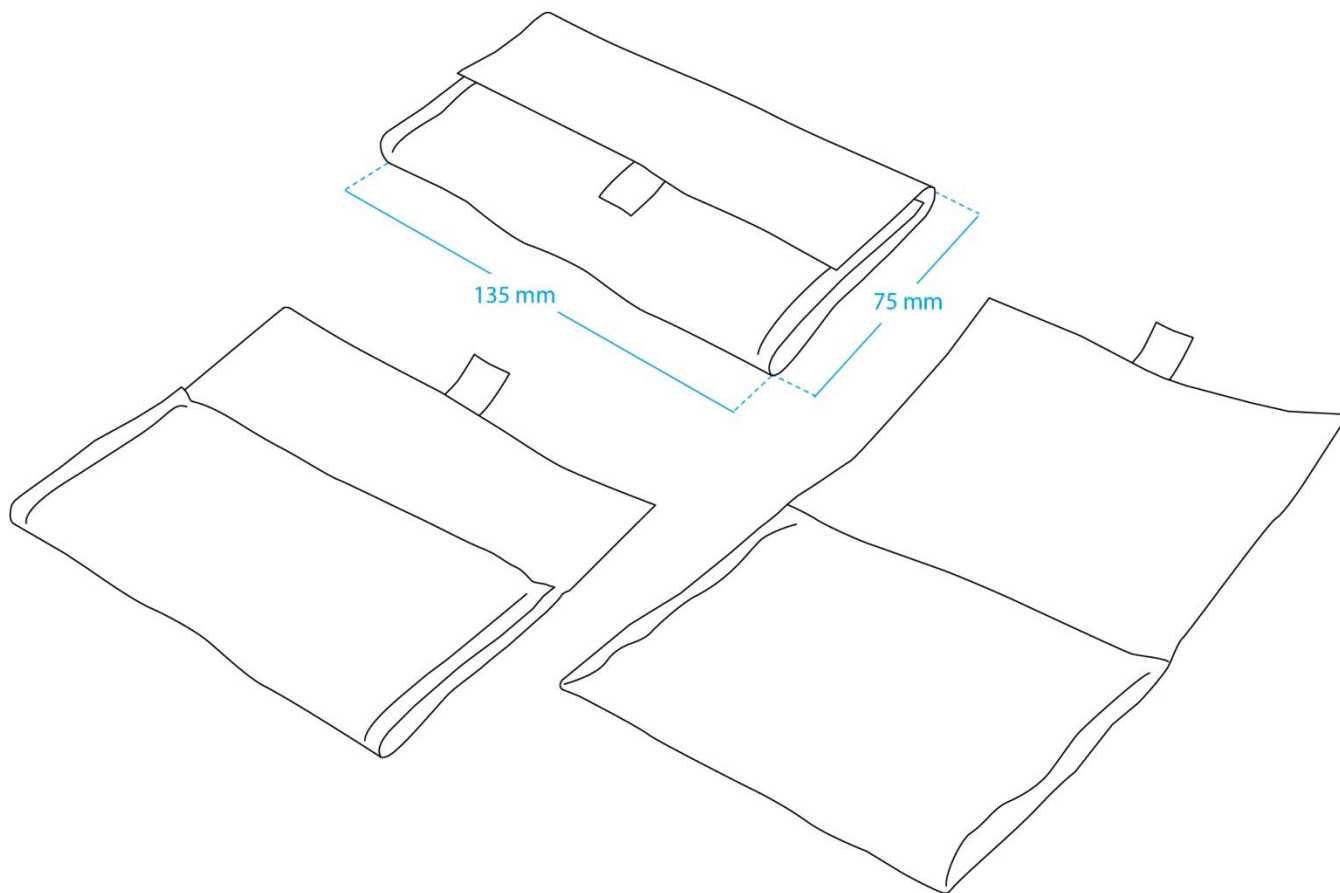
Cigarettes – Type 7: Outer packaging (flip top multi pack)	
Pack shape	Cuboid
Example dimensions	Closed: W: 283mm x H: 48mm x D: 90mm <i>(example dimensions only)</i>
Opening mechanism	Tuck top
Visibility of surfaces	Closed: All external faces visible In use: Top surface no longer showing, but inside lid now visible
Common materials/substrate	Carton; Coated Paper (40-100gsm); Coated Cardboard/Virgin Fibre Board (180-280gsm); FlexoPaper (80-120gsm); Metalised paper; wrapping film; wrapping paper
Common production/printing process	Gravure; Lithography Offset; (some CMYK only, others from 6-11 colours)
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Packs retailed in different orientations (portrait/landscape) and sitting on different sides (narrow side/wide side), so need to define what is the most visible face for warnings. Also need to consider whether the long edges or short edges are considered as 'lateral surfaces' and which face (side or top) would be considered to be the 'front' face.
Impact of new TPD on materials &/or production process	No obvious issues.

5.2.8. Cigarettes – Type 8: Outer packaging (shoulder hinge multi pack)



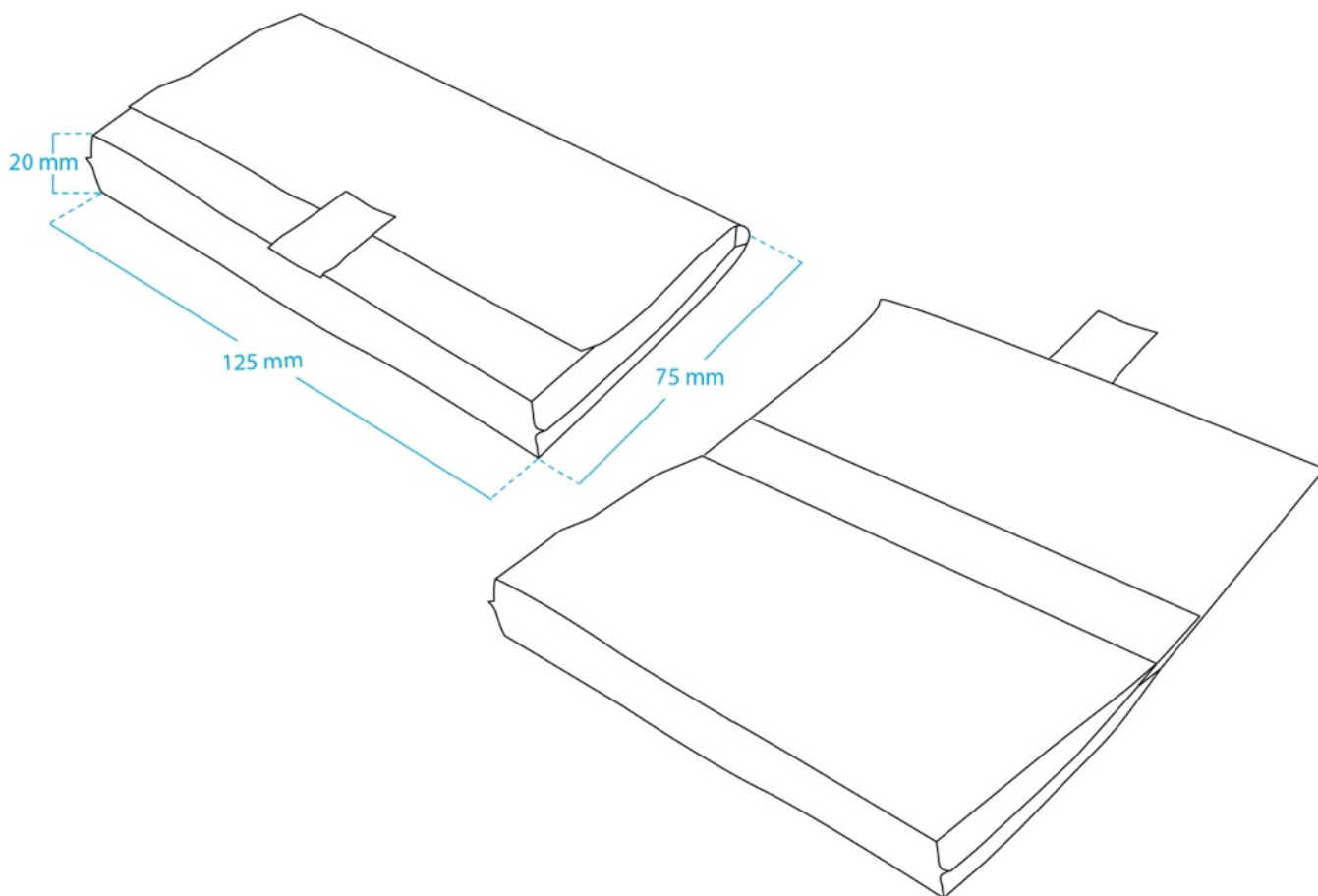
Cigarettes – Type 8: Outer packaging (shoulder hinge multi pack)	
Pack shape	Cuboid
Example dimensions	Closed: W: 168mm x H: 90mm x D: 100mm <i>(example dimensions only)</i>
Opening mechanism	Fold and tuck
Visibility of surfaces	Closed: All external faces visible In use: Top & front no longer showing, but inside now visible
Common materials/substrate	Carton; Coated Paper (40-100gsm); Coated Cardboard/Virgin Fibre Board (180-280gsm); FlexoPaper (80-120gsm); Metalised paper; wrapping film; wrapping paper
Common production/printing process	Gravure; Lithography Offset; (some CMYK only, others from 6-11 colours)
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Need to define the ‘front’ face. Because the side front face is part of the opening flap and splits when open, warnings will need to be positioned on or below the tapered flap, if this surface is considered to be the ‘front’.
Impact of new TPD on materials &/or production process	No obvious issues.

5.2.9. Roll-your-Own (RYO) – Type 1: Pouch with flap, flat/roll/wrap around (non-gusset)



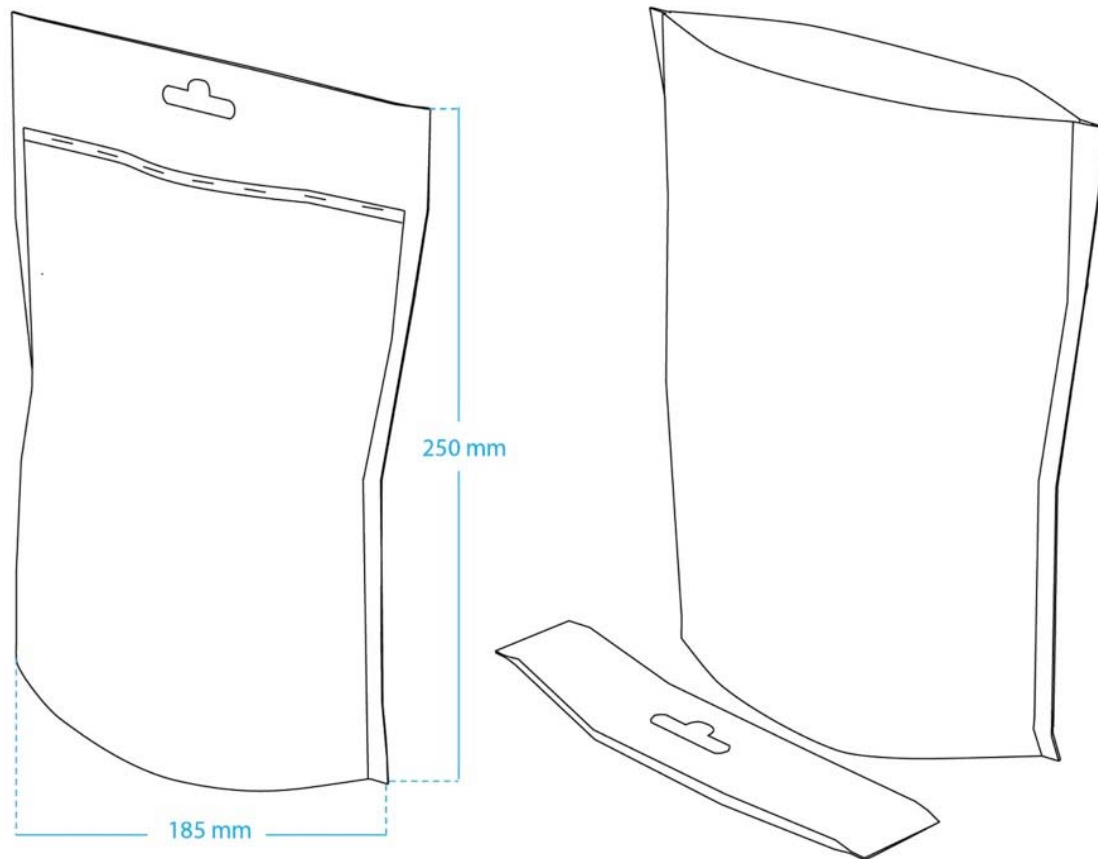
Roll-your-Own – Type 1: Pouch with flap, flat/roll/wrap around (non gusset)	
Pack shape	Flat folding pouch
Example dimensions	Closed: W: 129-154mm x H: 65-75mm (example dimensions only)
Opening mechanism	Rolled flap with self adhesive tab closure
Visibility of surfaces	<p>Closed: All external faces visible</p> <p>In use: Unfold Step 1 – ½ of back face no longer visible, but area under flap revealed; Unfold Step 2 – only inner pouch & inside surface of full flap visible</p>
Common materials/substrate	<p>Poly/laminate: printed film shaped to flat pouch with wraparound long flap made from various film combinations (PE, PP, PET, PETP, PETM, OPP 12-30µm) or combined with paper</p> <p>Paper-insert: paper label (80-115gsm) between 2 layers of transparent film (PE, PP, CPP, OP), shaped to flat pouch with wraparound long flap</p>
Common production/printing process	Gravure (up to 8-10 colours); Flexography (up to 5 colours); Lithography Offset (up to 6-8 colours); Printed white
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Pouches are (generally) merchandised vertically, so need to consider whether warning messages are at the correct orientation on shelf or when in use. Visibility of surface when open or closed should be assessed as part of D3.
Impact of new TPD on materials &/or production process	Flexography print process may not be good enough quality for printing images. Is there an issue with ink transfer on inner pouch surface used for rolling cigarette? Tax stamps & barcodes may have to be repositioned. Some outer flow-wraps and self-adhesive tabs are printed with graphics, which won't be allowable if overlap warnings.

5.2.10. Roll-your-Own (RYO) – Type 2: Pouch with flap, flat bottomed/side folded



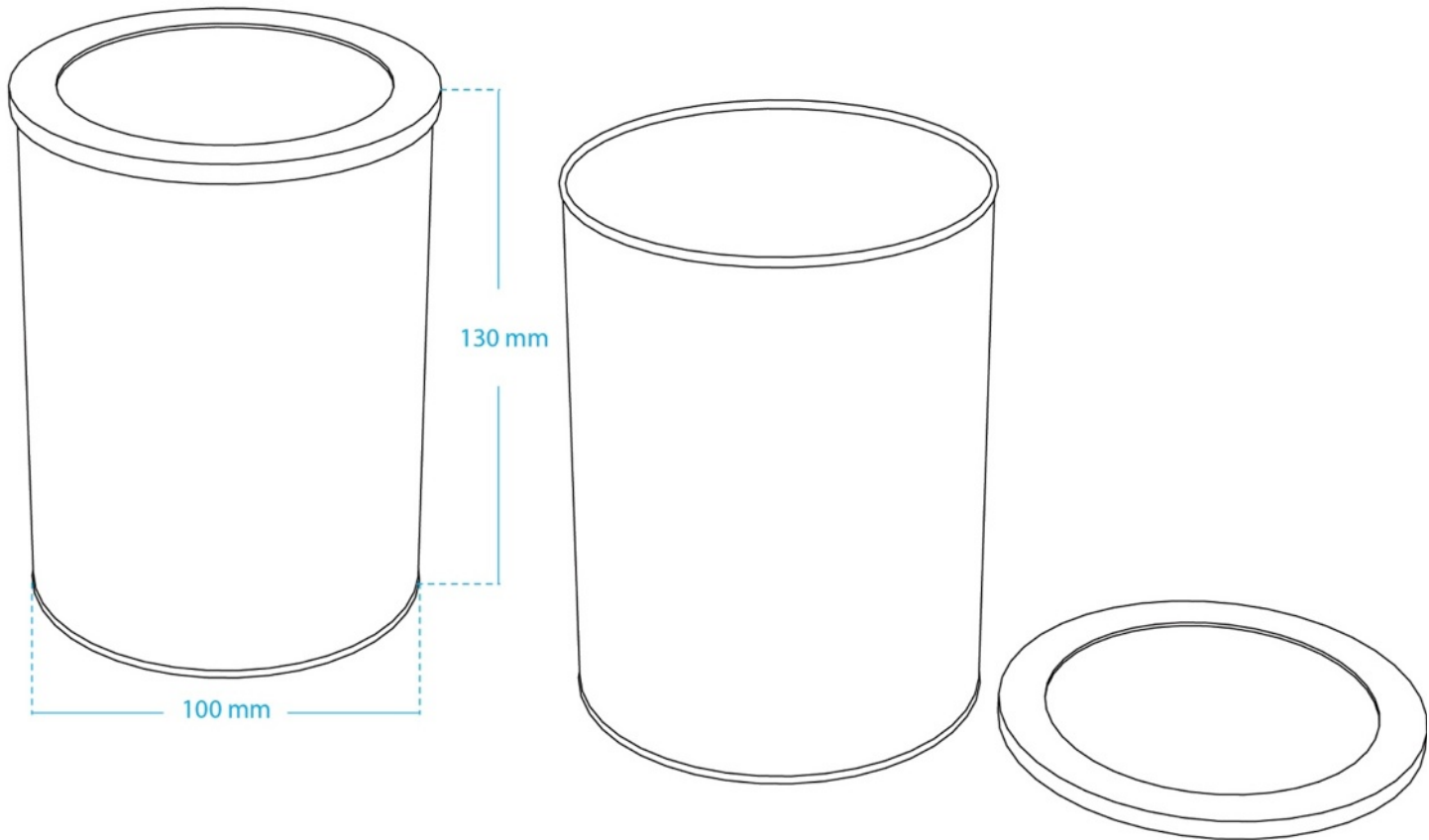
Roll-your-Own – Type 2: Pouch with flap, flat bottomed/side folded			
Pack shape	Folding pouch with gusset and flat/block bottom		
Example dimensions	Closed: W: 125mm x H: 75mm x D: 20mm <i>(example dimensions only)</i>		
Opening mechanism	Folding flap with self adhesive tab to close		
Visibility of surfaces	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">Closed: Front/back external faces visible; Poor visibility of side faces and bottom</td> <td style="width: 50%;">In use: Top ½ of inner pouch surface now visible, as well as inside of flap</td> </tr> </table>	Closed: Front/back external faces visible; Poor visibility of side faces and bottom	In use: Top ½ of inner pouch surface now visible, as well as inside of flap
Closed: Front/back external faces visible; Poor visibility of side faces and bottom	In use: Top ½ of inner pouch surface now visible, as well as inside of flap		
Common materials/substrate	Paper label (80-115gsm) between 2 layers of transparent film (PE, PP, CPP, OP), shaped to a pouch with gusseted bottom and side folds		
Common production/printing process	Gravure (up to 8-10 colours); Flexography (up to 5 colours); Lithography Offset (up to 6-8 colours)		
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Pouches are (generally) merchandised vertically, so need to consider whether warning messages are at the correct orientation on shelf or when in use. Visibility of surface when open or closed should be assessed as part of D3.		
Impact of new TPD on materials &/or production process	Flexography print process may not be good enough quality for printing images. Clear windows may no longer be possible, due to space. Tax stamps & barcodes may have to be repositioned. Some outer flow-wraps and self-adhesive tabs are printed with graphics, which will not be allowable if overlap warnings.		

5.2.11. Roll-your-Own (RYO) – Type 3: Standing pouch/Zip bag



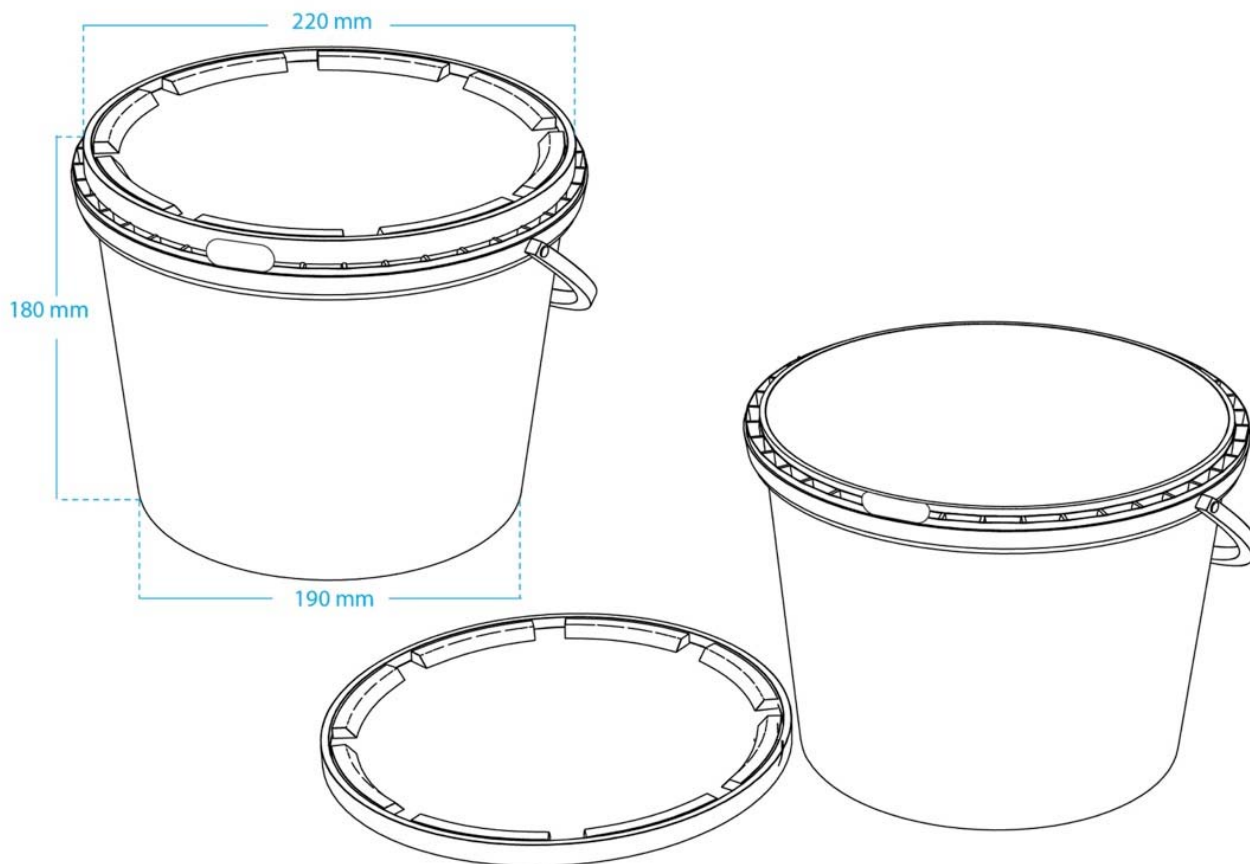
Roll-your-Own – Type 3: Standing pouch/Zip bag			
Pack shape	Tapered pouch with block bottom		
Example dimensions	Closed: W: 185mm x H: 250mm (dimensions range from: 180mm x 155mm to 230mm x 350mm) <i>(example dimensions only)</i>		
Opening mechanism	Cut/tear and then zip-lock to re-seal		
Visibility of surfaces	<table border="0"> <tr> <td>Closed: Front/back/base external faces visible</td> <td>In use: Front/back/base external faces visible, though top strip above ziplock now removed. Inner surface now partially visible</td> </tr> </table>	Closed: Front/back/base external faces visible	In use: Front/back/base external faces visible, though top strip above ziplock now removed. Inner surface now partially visible
Closed: Front/back/base external faces visible	In use: Front/back/base external faces visible, though top strip above ziplock now removed. Inner surface now partially visible		
Common materials/substrate	Printed laminate (PETP, PE, PETM, OPP – 12-30µm; or combined with paper) shaped to a standing pouch via special sealing on the bottom		
Common production/printing process	Flexography (up to 8-10 colours); Gravure		
How pack shape/size & opening mechanism might impact the visibility/position of warnings	No lateral surfaces, so General Warning and Information Message will have to be positioned elsewhere – bottom of pack and/or inside surface only obvious options. Tax stamps currently overlap ziplock seal and back surface, so may need to be repositioned. Top of bag will be removed, so warnings will need to be positioned below ziplock seal.		
Impact of new TPD on materials &/or production process	Flexography print process may not be good enough quality for printing images and an allowance needs to be made for movement and safe print area. Clear windows may no longer be possible due to space.		

5.2.12. Roll-your-Own (RYO) – Type 4: Cylinder, card (medium)



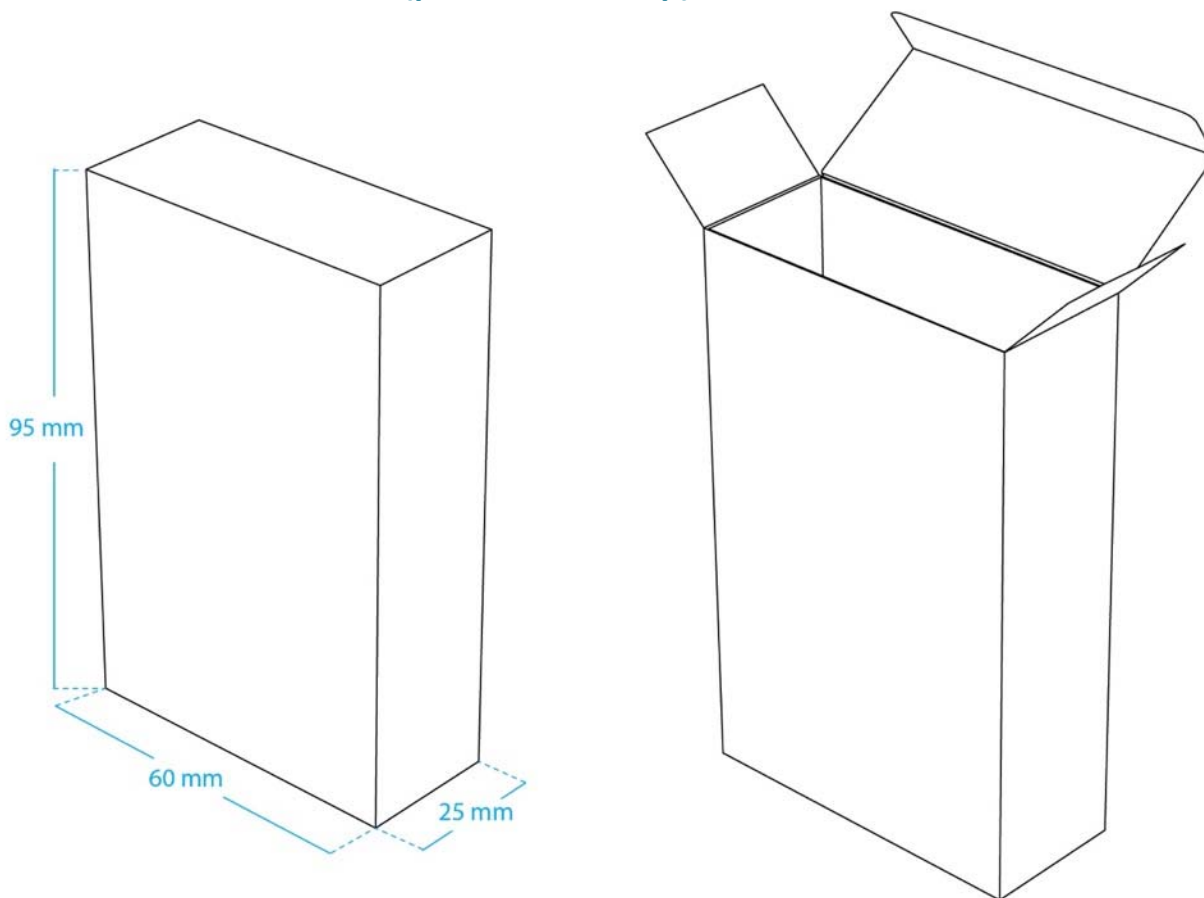
Roll-your-Own – Type 4: Cylinder, card (medium)	
Pack shape	Cylindrical
Example dimensions	Closed: Diameter: 100mm x H: 95-240mm (<i>example dimensions only</i>)
Opening mechanism	Snap-on lid or cardboard integrated lid with inner peel membrane
Visibility of surfaces	Closed: Surface divided into front/back and 2x side faces – all visible In use: When lid removed, inside lid visible; Inner surface of tub also now visible
Common materials/substrate	Body & base: Printed board (300-450gsm)/printed paper glued on board, aluminium (7µm)/PET MET & PE laminate Membrane: Aluminium/PE laminate or paper/PET/PP Lid: Coloured plastic (PP) or printed board & PE laminate
Common production/printing process	Lithography Offset (up to 6-8 colours)
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Top of lid provides good area for messaging, but lid discarded when pack in use. Impossible to control orientation of pack so that front face visible when pack closed &/or in use. Pack can be opened from any orientation. Lid has no seal, so can be opened from any side, therefore possible to open without breaking Tax Stamp. However, tobacco cannot be accessed without tearing inner membrane.
Impact of new TPD on materials &/or production process	Lids are currently unprinted coloured plastic (with embossing in some instances). Printing not possible with current substrate/process.

5.2.13. Roll-your-Own (RYO) – Type 5: Cylindrical bucket



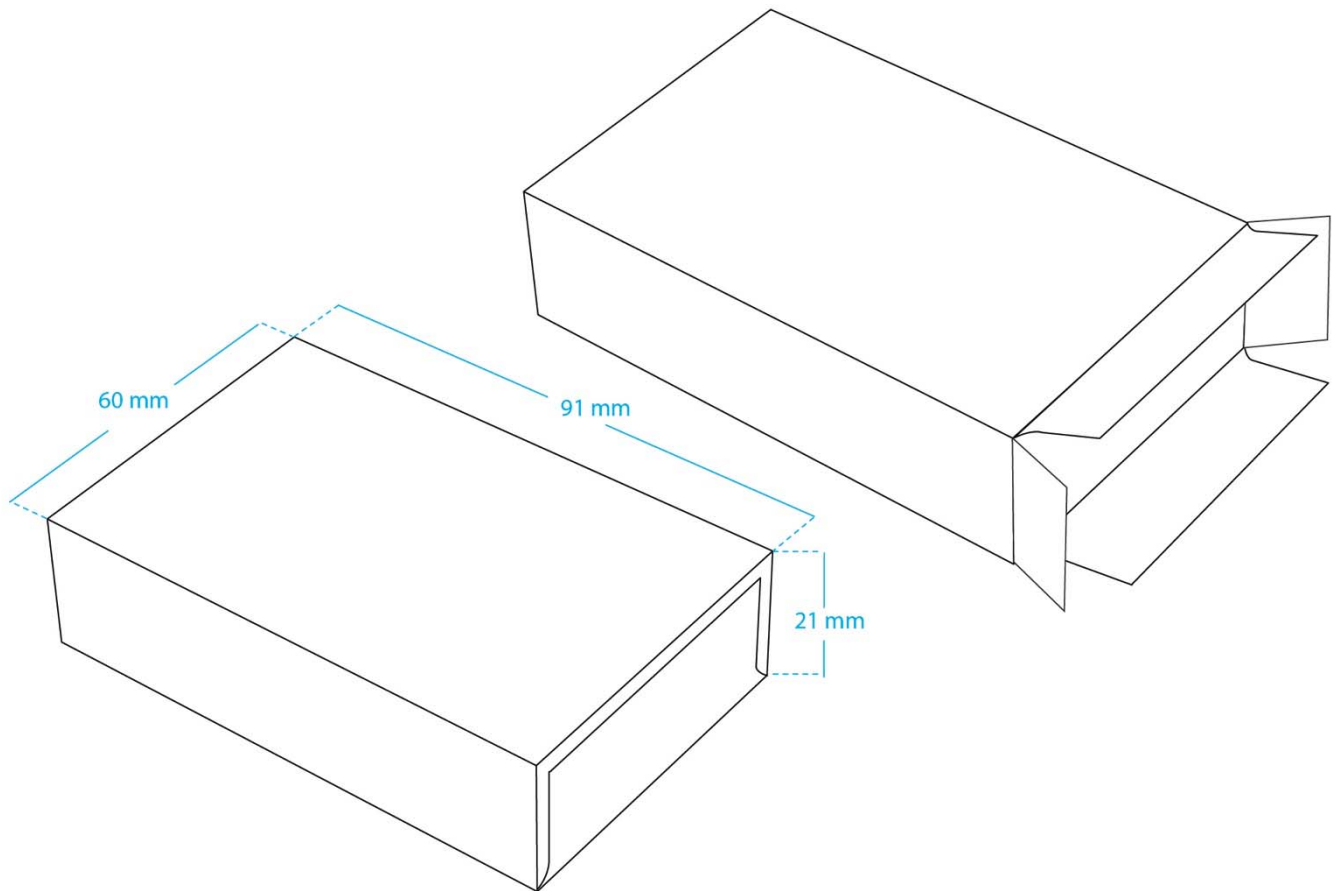
Roll-your-Own – Type 5: Cylindrical bucket	
Pack shape	Tapered cylinder
Example dimensions	Closed: Diameter: 220mm(top)/190mm(base) x H: 180mm; Diameter: 260mm(top)/235mm(base) x H: 210mm; H: range from 120-210mm (<i>example dimensions only</i>)
Opening mechanism	Snap-on lid with break seal
Visibility of surfaces	Closed: Surface divided into front/back & 2x side faces – all visible In use: When lid removed, inside lid visible; Inner surface of tub also now visible
Common materials/substrate	In mould buckets: Plastic (PP, PE) with in mould labelling using coated paper or plastic Labelled buckets: Plastic (PP, PE) with self-adhesive paper labels
Common production/printing process	In mould labelling (IML); Stickered labels; Lithography Offset (up to 6-8 colours)
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Top of lid provides good area for messaging, but lid discarded when pack in use. Impossible to control orientation of pack so that front face visible when pack closed &/or in use. Pack can be opened from any orientation.
Impact of new TPD on materials &/or production process	Some lids not currently printed. Lids with labels may not be allowable.

5.2.14. Waterpipe – Type 1: Carton box (portrait, tuck top)



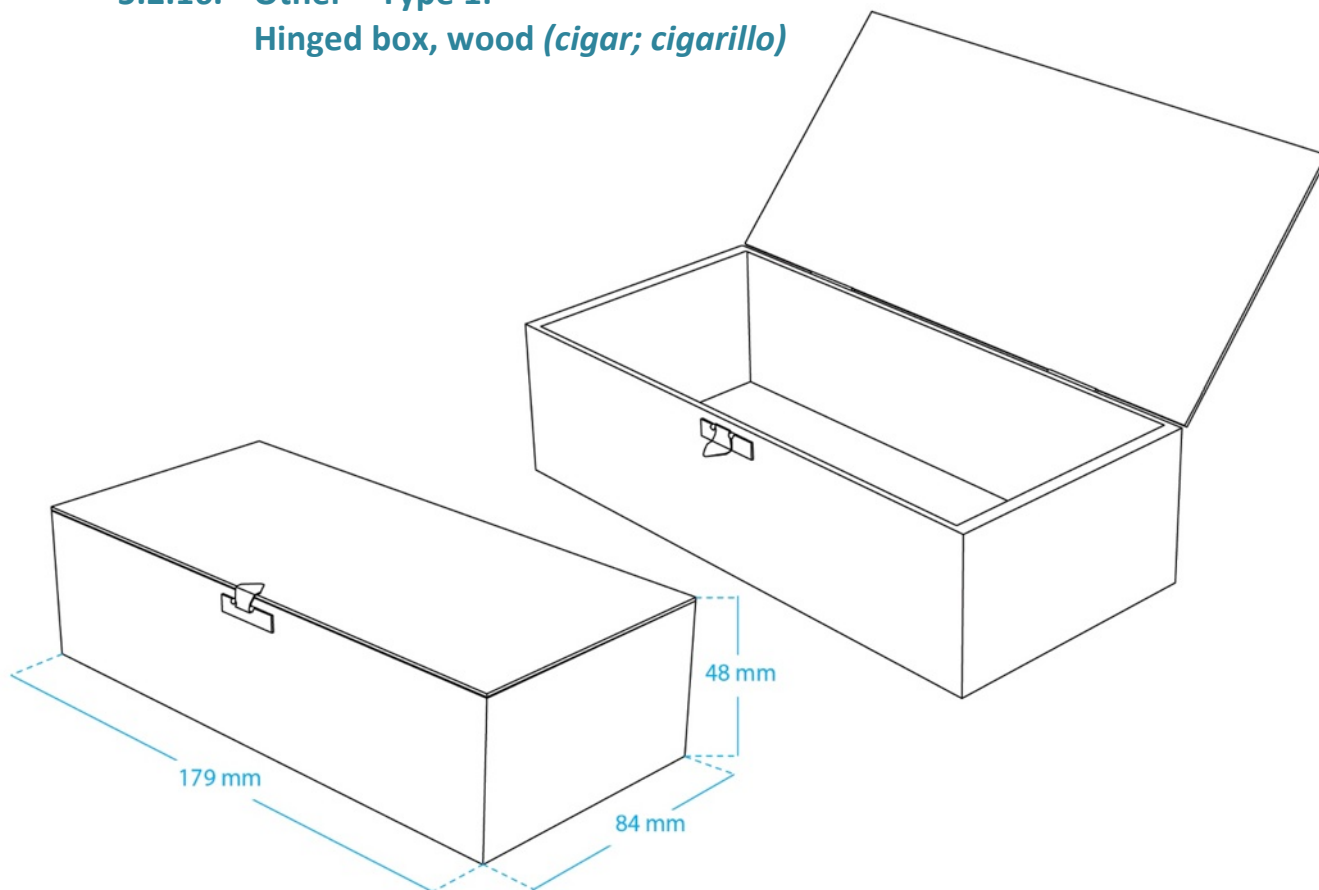
Waterpipe – Type 1: Carton box (portrait)	
Pack shape	Cuboid
Example dimensions	Closed: W: 60mm x H: 95mm x D: 23mm <i>(example dimensions only)</i>
Opening mechanism	Tuck top
Visibility of surfaces	Closed: All external faces visible In use: All surfaces visible, other than top
Common materials/substrate	Cardboard (230gsm)
Common production/printing process	Lithography Offset (up to 8-10 colours)
How pack shape/size & opening mechanism might impact the visibility/position of warnings	No issues foreseen
Impact of new TPD on materials &/or production process	Tax stamp may need to be repositioned if current position overlaps warnings.

5.2.15. Waterpipe – Type 2: Carton box (landscape)



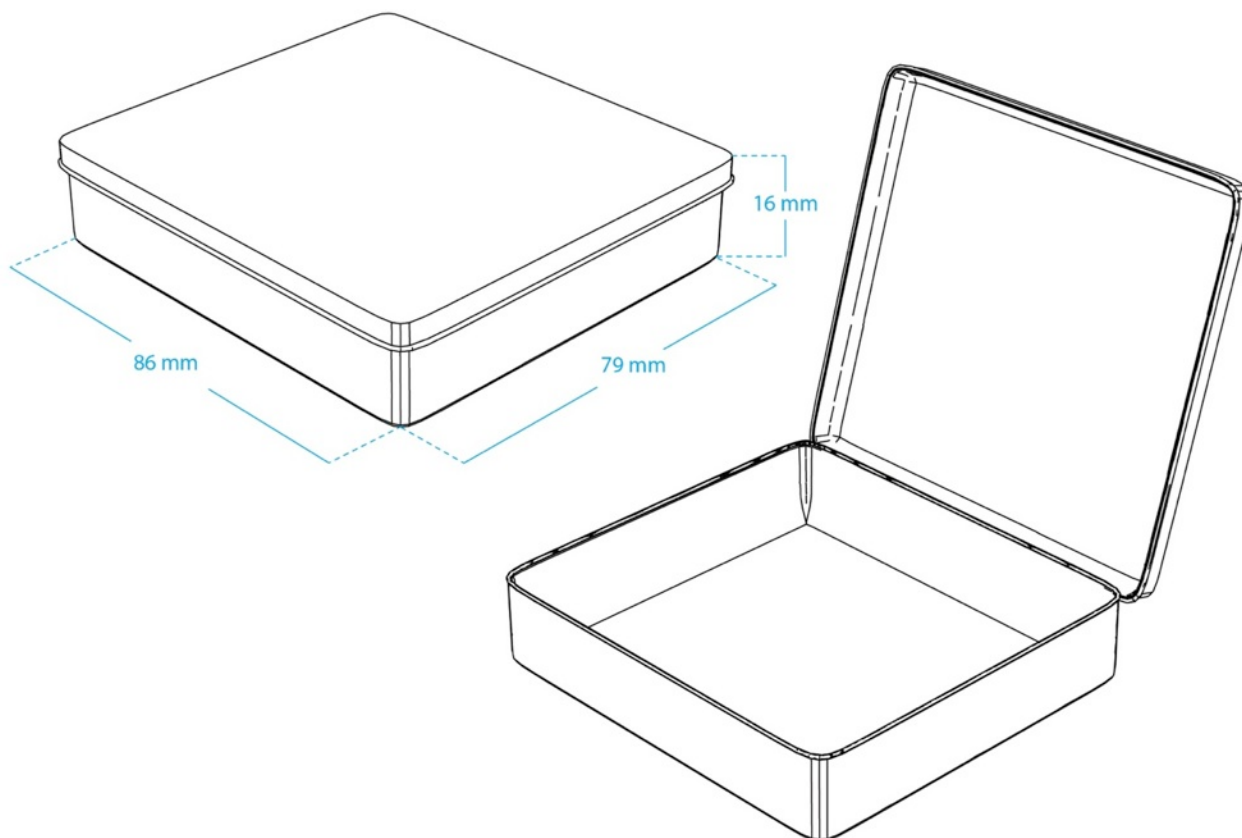
Waterpipe – Type 2: Carton box (landscape)	
Pack shape	Cuboid
Example dimensions	Closed: W: 91mm x H: 60mm x D: 21mm <i>(example dimensions only)</i>
Opening mechanism	Glued box with inner foil pouch
Visibility of surfaces	Closed: All external faces visible In use: All external faces visible
Common materials/substrate	Cardboard (230gsm)
Common production/printing process	Assume Lithography Offset (up to 8-10 colours)
How pack shape/size & opening mechanism might impact the visibility/position of warnings	No issues foreseen, other than the need to define which face (side or top) would be considered to be the 'front' face
Impact of new TPD on materials &/or production process	Tax stamp may need to be repositioned if current position overlaps warnings.

**5.2.16. Other – Type 1:
Hinged box, wood (cigar; cigarillo)**



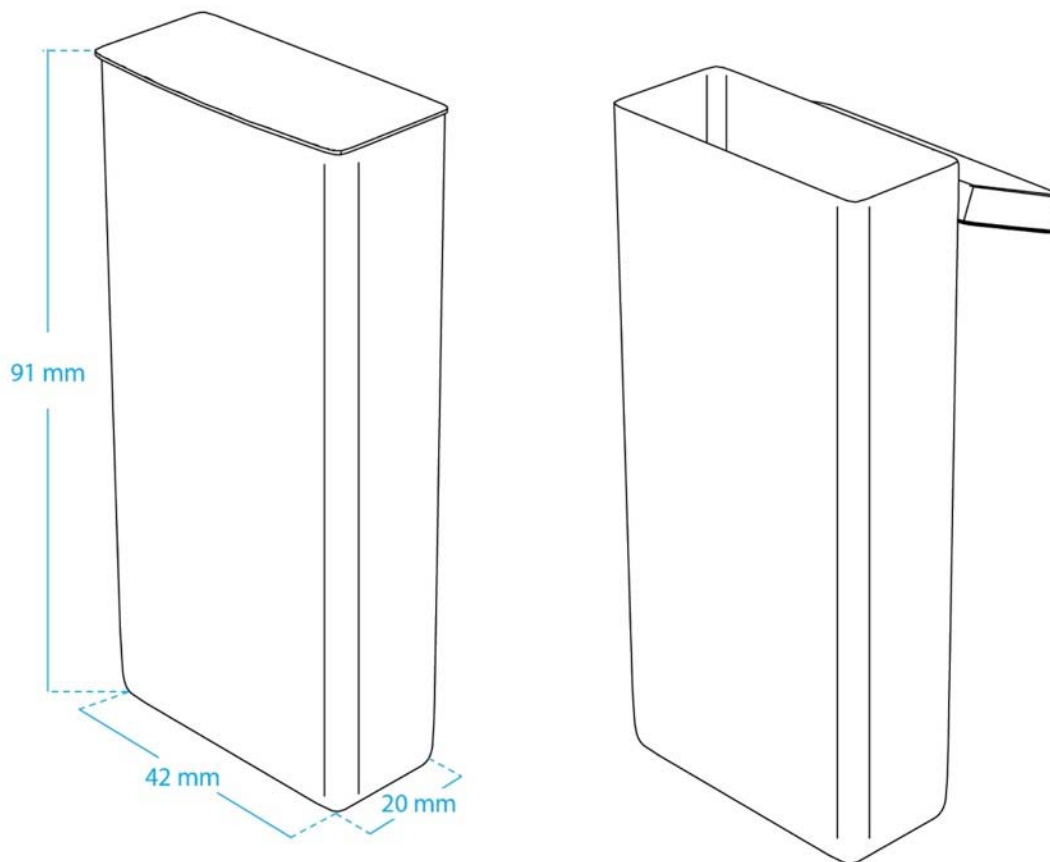
Other – Type 2: Hinged box, wood (cigar; cigarillo)	
Pack shape	Cuboid
Example dimensions	Closed: W: 179mm x H: 84mm x D: 48mm (<i>example dimensions only</i>) (dimensions range from: W: 47-342mm; H: 79-342mm; D: 11-62mm)
Opening mechanism	Hinged lid with clip fastening
Visibility of surfaces	Closed: All external faces visible In use: Top no longer showing, but inside lid visible
Common materials/substrate	Wood or Plywood with labels/paper wrap (135gsm); Cedar Wood – printed directly Cardboard (folding & recycling)
Common production/printing process	Labels/Paper wrap on wood: Gravure (up to 3 colours); Flexography (up to 6-9 colours); Offset on flap sheet Directly on to wood: Screen printing (up to 3 colours); Cliché (Stereotype) printing; Hot foil stamping; Heatstamp; Letterpress (1 colour) Card: Lithography Offset (up to 6-10 colours)
How pack shape/size & opening mechanism might impact the visibility/position of warnings	There may be different interpretations as to which face (side or top) would be considered to be the 'front' face.
Impact of new TPD on materials &/or production process	Quality/flexibility of some print techniques may not be good enough – warnings may have to be applied by irremovable stickers. Tax stamp may need to be repositioned if current position overlaps warnings. 'Full regime' may be required by Member States.

**5.2.17. Other – Type 2:
Hinged box, tin, square (cigarillo; pipe)**



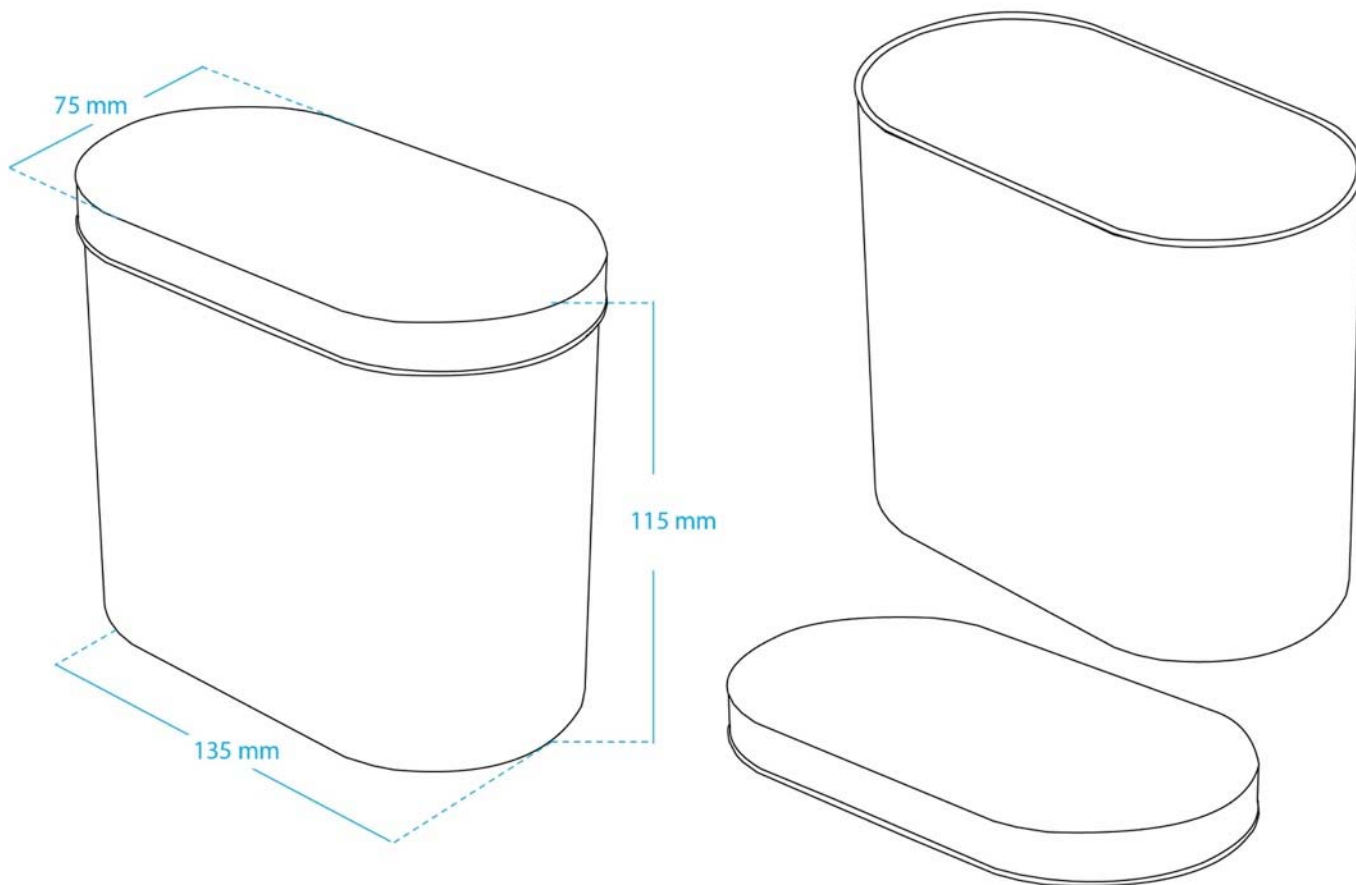
Other – Type 2: Hinged box, tin, square (cigarillo; pipe)	
Pack shape	Cuboid with rounded corners
Example dimensions	Closed: W: 86mm x H: 16mm x D: 79mm (dimensions range from: W: 42-161mm; H: 72-112mm; D: 9-27mm) <i>(example dimensions only)</i>
Opening mechanism	Hinged lid with snap fit
Visibility of surfaces	Closed: All external faces visible In use: Top no longer showing, but inside lid visible
Common materials/substrate	Tin (aluminium) (0,18-0,22 microns) Labels: Paper
Common production/printing process	Offset (up to 6 colours); Offset Sheet printing: (up to 6-10 colours); Metallic sheet printing (up to 6 colours); Stickered labels
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Sides of tin not printed, so warnings can currently only be applied to top & bottom surfaces (or inside lid).
Impact of new TPD on materials &/or production process	Print quality may not be good enough – warnings may have to be applied by irremovable stickers. Tax stamp may need to be repositioned if current position overlaps warnings. ‘Full regime’ may be required by Member States.

5.2.18. Other – Type 3 Hinged tin, upright (*cigarillo*)



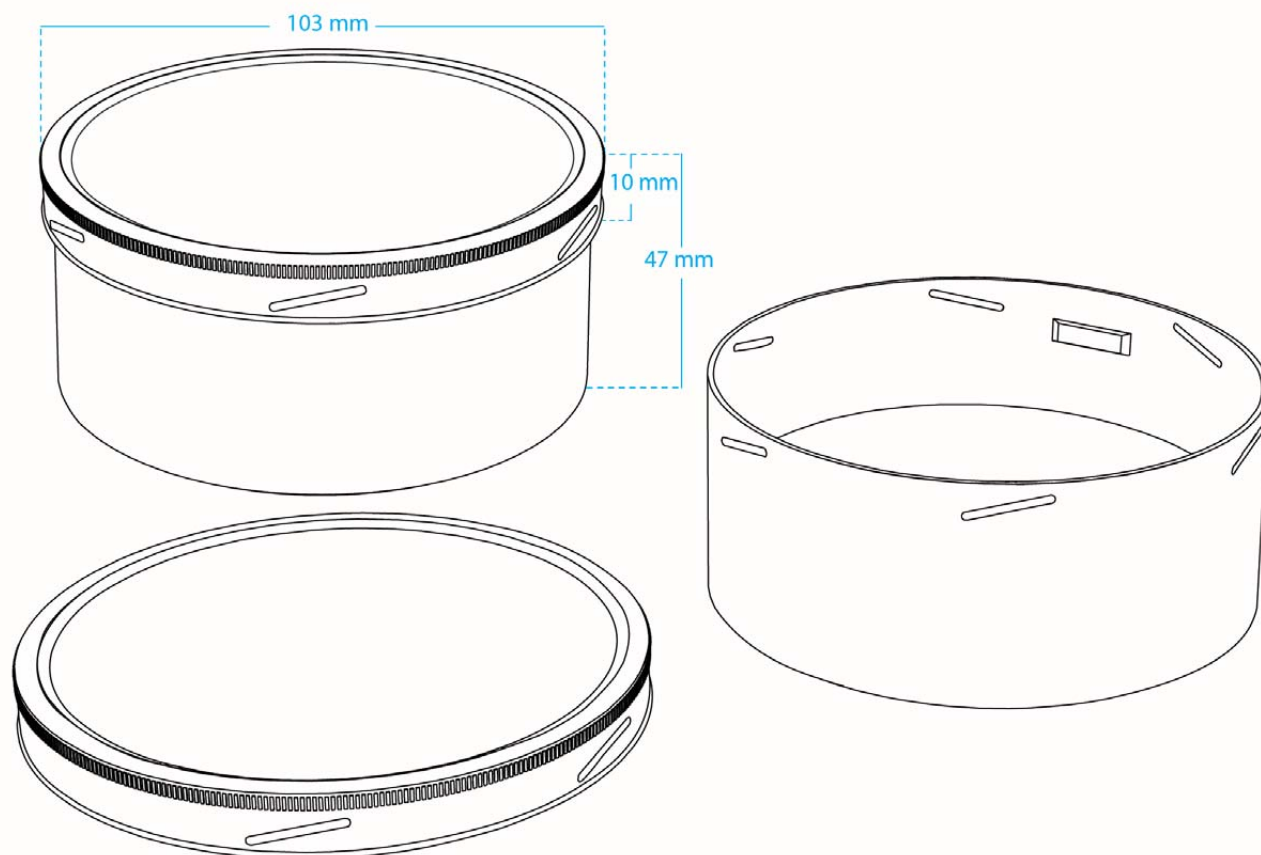
Other – Type 3: Hinged tin, upright (<i>cigarillo</i>)	
Pack shape	Cuboid with rounded corners
Example dimensions	Closed: W: 42mm x H: 91mm x D: 20mm (<i>example dimensions only</i>) (dimensions range from: W: 34-42mm; H: 81-98mm; D: 19-20mm)
Opening mechanism	Hinged lid with snap fit
Visibility of surfaces	Closed: All external faces visible In use: Top no longer showing, but inside lid visible
Common materials/substrate	Tin (aluminium) (0,18-0,22 microns)
Common production/printing process	Offset Sheet printing: (up to 6-10 colours); Coated metallic sheet printing (up to 6 colours)
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Some packs quite small. Need to consider this if 'Full regime' is applied by MS.
Impact of new TPD on materials &/or production process	Print quality may not be good enough – warnings may have to be applied by irremovable stickers. Tax stamp may need to be repositioned if current position overlaps warnings.

**5.2.19. Other – Type 4:
Cuboid tin, rounded corners (*cigar, cigarillo*)**



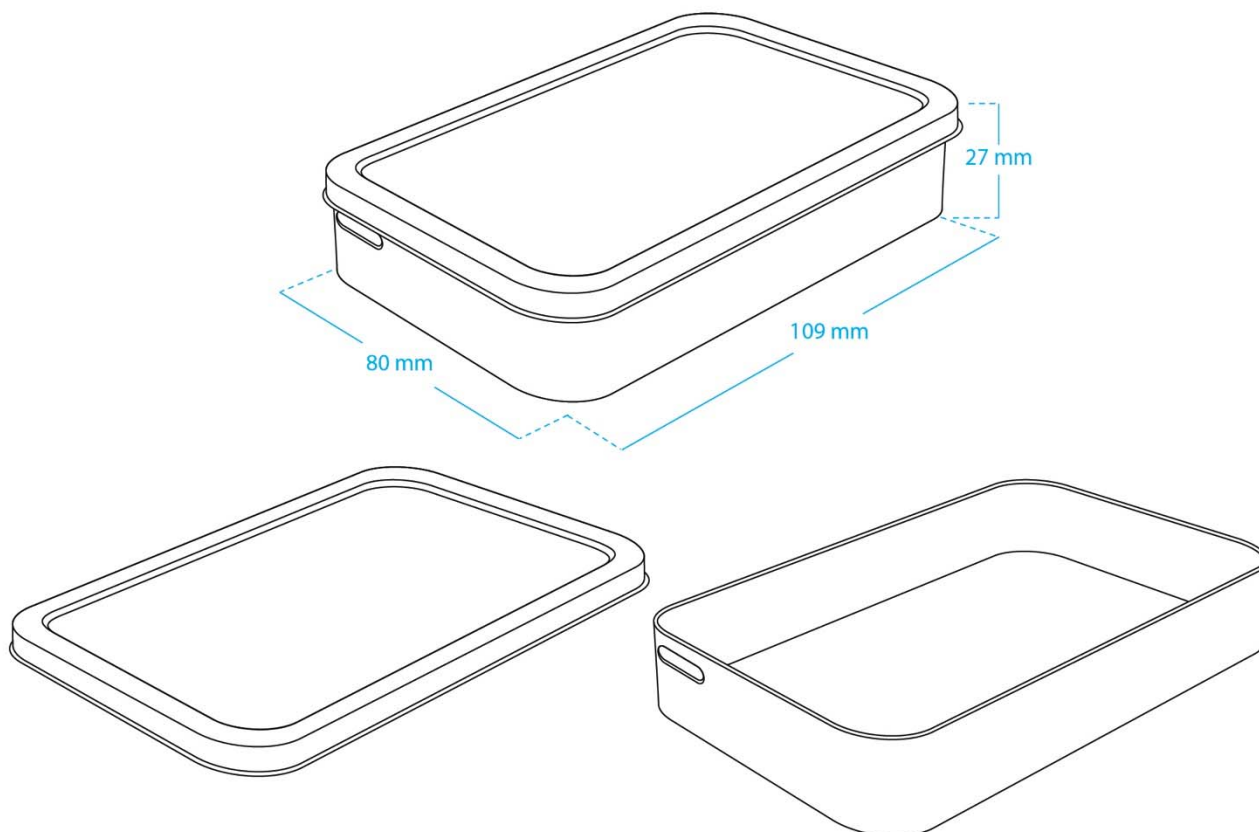
Other – Type 4: Cuboid tin, rounded corners (<i>cigar, cigarillo</i>)	
Pack shape	Cuboid with rounded corners
Example dimensions	Closed: W: 135mm x H: 115mm x D: 75mm (<i>example dimensions only</i>) (round dimensions range from: Diameter: 80-83mm; H: 123-148mm)
Opening mechanism	Snap fit lid or lever lid with inner peel membrane
Visibility of surfaces	Closed: All external faces visible In use: Top no longer showing, but inside lid visible
Common materials/substrate	Printed tins: Tin (aluminium) (0,18-0,22 microns) Labelled tins: Paper label
Common production/printing process	Printed tins: Offset Sheet printing: (up to 6-10 colours); Coated metallic sheet printing (up to 6 colours); Tinplate Offset (up to 3-6 colours) Labelled tins: Stickered labels – self adhesive, top & bottom
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Front/back surfaces not clearly delineated from lateral surfaces for placement of warnings. Top of lid provides good area for messaging, but lid discarded when pack in use.
Impact of new TPD on materials &/or production process	Print quality may not be good enough – warnings may have to be applied by irremovable stickers. Tax stamp may need to be repositioned if current position overlaps warnings. ‘Full regime’ may be required by Member States.

5.2.20. Other – Type 5: Vacuum metal tin, round (*pipe*)



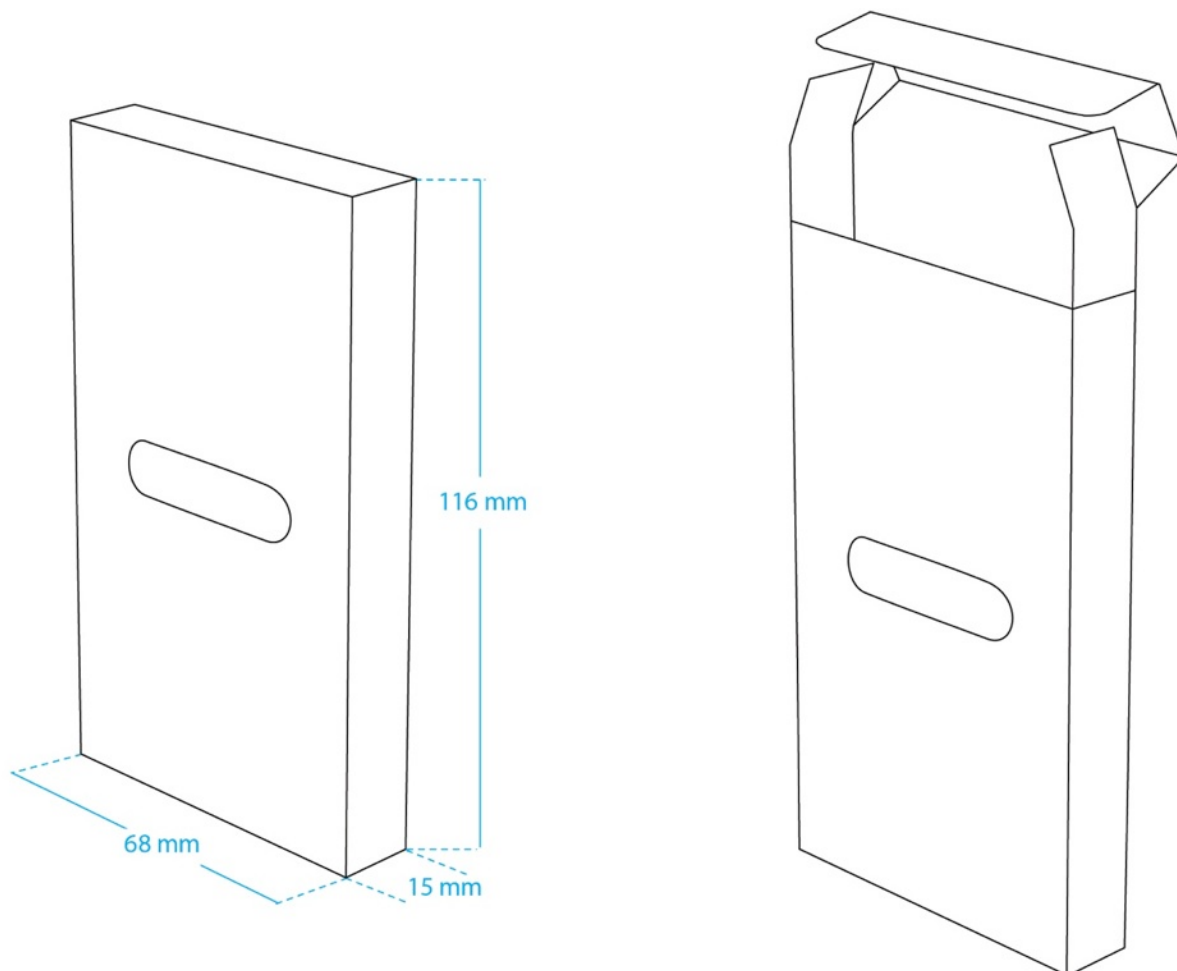
Other – Type 5: Vacuum metal tin, round (<i>pipe</i>)	
Pack shape	Cylindrical
Example dimensions	Closed: Diameter: 103mm x H: 47mm (<i>example dimensions only</i>)
Opening mechanism	Screw/Twist vacuum compound lid
Visibility of surfaces	Closed: All external faces visible In use: When lid removed, inside lid visible
Common materials/substrate	Printed tins: Metal (tin) Labelled tins: Paper label
Common production/printing process	Printed tins: Offset sheet printing; Coated metallic printing Labelled tins: Stickered labels – self adhesive, top and bottom
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Sides of tin currently not printed, but it should be possible. The top and bottom surfaces, as well as the inner 'keep fresh' paper/card insert could also be printed.
Impact of new TPD on materials &/or production process	'Full regime' may be required by Member States. If Combined Warnings are required by Member State, stickered labels would be required in order to print the images. Tax Stamps may have to be more carefully positioned so they do not interfere with warnings (if applicable).

5.2.21. Other – Type 6: Rectangular tin (*pipe*)



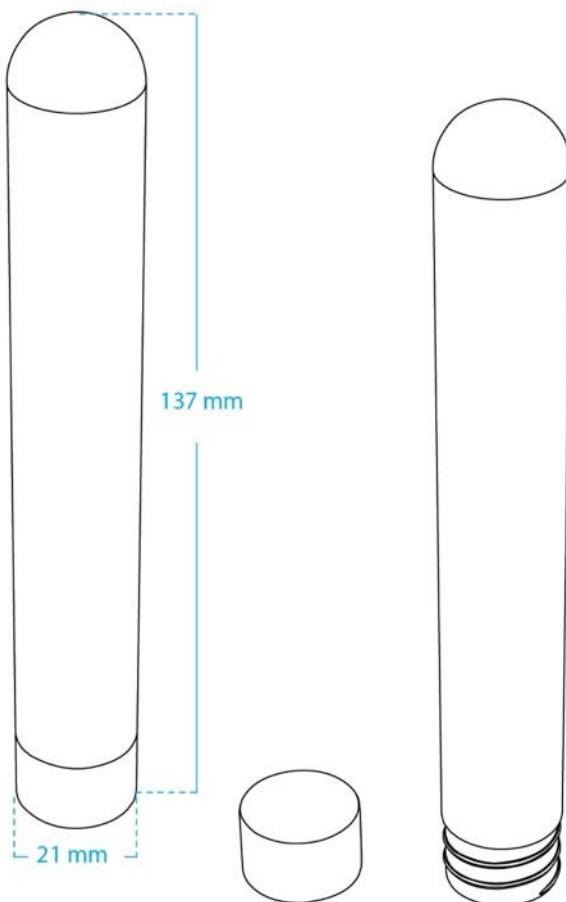
Other – Type 6: Rectangular tin (<i>pipe</i>)	
Pack shape	Cuboid
Example dimensions	Closed: W: 80mm x H: 109mm x D: 27mm (<i>example dimensions only</i>)
Opening mechanism	Snap fit lid
Visibility of surfaces	Closed: All external faces visible In use: When lid removed, inside lid visible
Common materials/substrate	Printed tins: Metal (tin) Labelled tins: Paper label
Common production/printing process	Flexography with stickered labels – flow-wrap
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Sides of tin currently not printed, so warnings can only be applied to top and bottom surfaces (or inside lid). Inner ‘keep fresh’ paper/card insert could also be printed.
Impact of new TPD on materials &/or production process	‘Full regime’ may be required by Member States. If Combined Warnings are required by Member State, stickered labels would be required in order to print the images. Tax Stamps may have to be more carefully positioned to avoid warnings (if applicable).

5.2.22. Other – Type 7: Shell & Slide box, paper (cigar; cigarillo)



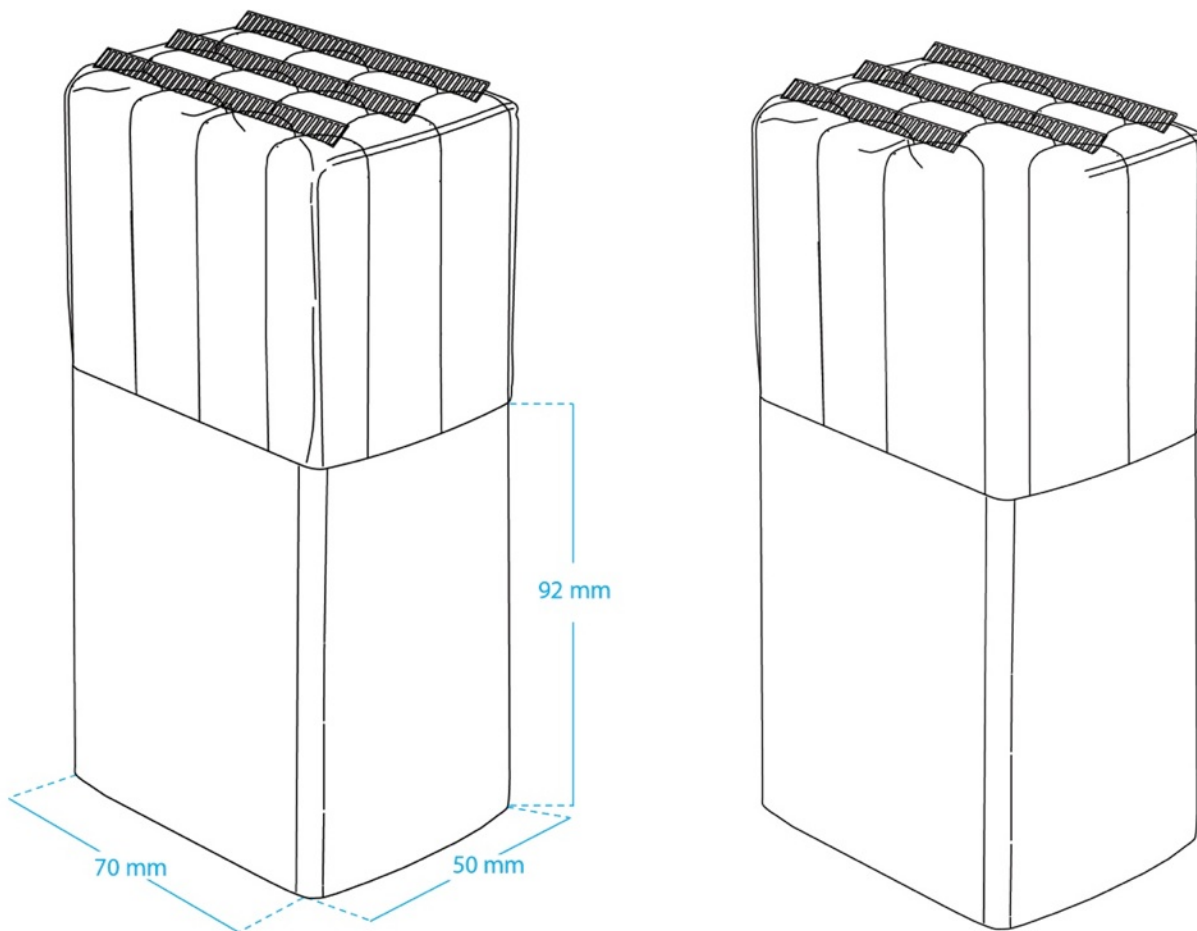
Other – Type 7: Shell & Slide box, paper (cigar; cigarillo)	
Pack shape	Cuboid
Example dimensions	Closed: W: 68mm x H: 116mm x D: 15mm (example dimensions only)
Opening mechanism	Tuck and slide
Visibility of surfaces	Closed: All external faces visible In use: Slide insert now visible
Common materials/substrate	Carton; Cardboard (folding & recycling)
Common production/printing process	Lithography Offset; Flexography (up to 6 colours)
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Lateral sides often very narrow.
Impact of new TPD on materials &/or production process	'Full regime' may be required by Member States. Windows may not be possible or may have to be repositioned to allow for warnings. Tax stamp may need to be repositioned if current position overlaps warnings.

**5.2.23. Other – Type 8:
Single tube, tin (cigar)**



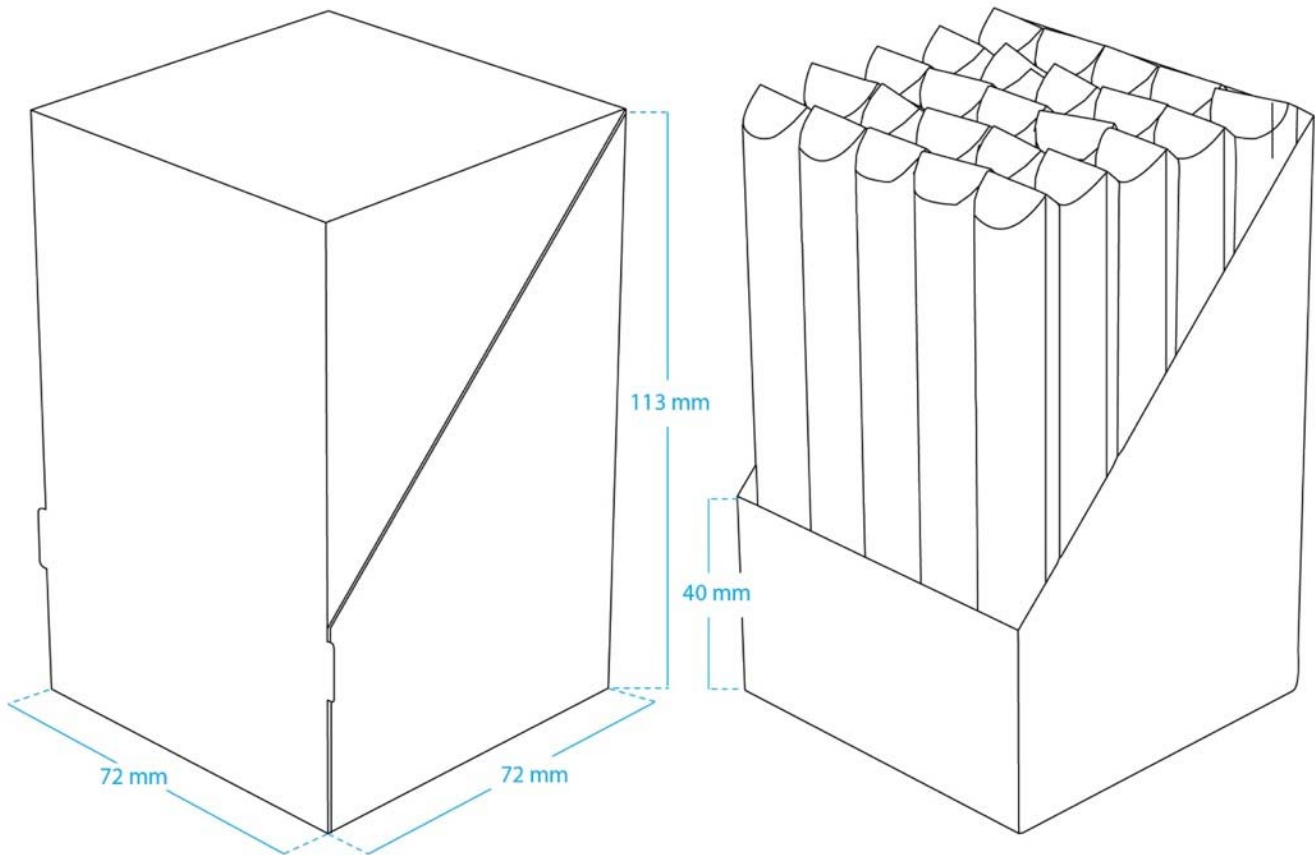
Other – Type 8: Single tube, tin (cigar)	
Pack shape	Cylindrical tube
Example dimensions	Closed: Diameter: 21mm x H: 137mm x D: N/A (<i>example dimensions only</i>)
Opening mechanism	Screw cap
Visibility of surfaces	Closed: All external faces visible In use: Tube discarded.
Common materials/substrate	Printed tin: Tin (aluminium) Labelled tin: Coated paper
Common production/printing process	Printed tins: Offset sheet printing; Coated metallic printing Labelled tins: Stickered labels – self adhesive, top and bottom
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Very small surface area for warning messages.
Impact of new TPD on materials &/or production process	'Full regime' may be required by Member States. Print quality may not be good enough – warnings may have to be applied by irremovable stickers. Tax stamp may need to be repositioned if current position overlaps warnings.

5.2.24. Other – Type 9: Bundle (*cigar*)



Other – Type 9: Bundle (<i>cigar</i>)	
Pack shape	Cuboid
Example dimensions	Closed: W: 70mm x H: 92mm x D: 50mm (<i>example dimensions only</i>)
Opening mechanism	Tear film
Visibility of surfaces	Closed: All external faces visible In use: All external faces visible
Common materials/substrate	Plastic film with paper insert
Common production/printing process	Lithography Offset (up to 6-10 colours); Gravure
How pack shape/size & opening mechanism might impact the visibility/position of warnings	Unknown how these are used by consumers. Consideration needs to be given to how much of the full surface area is printable – e.g. just the paper label? If so, warnings not taking up a significant area of the full bundle.
Impact of new TPD on materials &/or production process	'Full regime' may be required by Member States Tax stamp may need to be repositioned if current position overlaps warnings.

**5.2.25. Other – Type 10:
Multi-pack display (*cigar; cigarillo*)**



Other – Type 10: Multi-pack display (<i>cigar; cigarillo</i>)	
Pack shape	Cuboid
Example dimensions	Closed: W: 72mm x H: 113mm x D: 72mm (<i>example dimensions only</i>)
Opening mechanism	Tear perforation and fold back
Visibility of surfaces	<p>Closed: All external faces visible</p> <p>In use: Front and top faces not showing, 1/3 of lateral faces removed, inside front panel now visible</p>
Common materials/substrate	Cardboard (180-300gsm)
Common production/printing process	Lithography Offset (up to 6-10 colours); Gravure
How pack shape/size & opening mechanism might impact the visibility/position of warnings	A significant amount of the pack surfaces visible when closed, are removed or don't show once pack opened, so warnings will need to be considered for both uses.
Impact of new TPD on materials &/or production process	'Full regime' may be required by Member States. Tax stamp may need to be repositioned if current position overlaps warnings.

6. Cross-analysis of package types

6.1. Overall analysis

6.1.1. By tobacco category across all pack types

Cigarettes

Under the new TPD, Cigarettes will only be allowable in a cuboid shaped pack, made of carton or soft material, and which cannot be re-closed or re-sealed after it is first opened, other than the flip-top lid and shoulder box with hinged lid, both of which must be hinged at the back. Unit packs must contain no less than 20 Cigarettes.

Some companies did include pack types that will not be allowed in their questionnaire response (e.g. tins), however the most common pack types indicated in this category were:

- Flip-top boxes
- Soft packs
- Shoulder hinged boxes

Within each pack type, there is some variation in shapes and sizes, such as rounded or bevelled edges in flip-top packs, tall packs, wide packs etc. However, most companies seem to produce these different formats.

Size, shape and position of Tax Stamps may create some issues, particularly with soft packs.

RYO

Under the new TPD, unit packs of RYO tobacco must have a cuboid shape (rounded corners are allowed), cylindrical shape or in the form of a pouch (pouch with flap or standing pouch). Unit packs must contain at least 30g of tobacco.

Some companies did include pack types in their questionnaire response that may not be allowed if they do not contain the minimum 30g of tobacco (e.g. soft packs). However, the most common pack types indicated in this category were:

- Pouches with flap
- Cylinder
- Standing pouches
- Buckets
- Tins

Within each pack type, there is some variation in shapes and sizes, particularly the size of cylinders, standing pouches and buckets, and there are numerous different substrates and printing techniques, even with one type (e.g. pouch with flap). However, most companies seem to produce these different formats.

Size, shape and position of Tax Stamps may create some issues, and lack of surfaces on standing pouches may be problematic. The TPD specifies that irremovable stickers are allowable on all packs other than Cigarettes and RYO in pouches, so warnings can be adhered to the inside of lids etc. by this method if required.

Waterpipe

The new TPD legislation specifies that they should follow the ‘full regime’, meaning they should display combined health warnings, the general warning and information message. There are no requirements for package shape and size.

Only four companies indicated that they produce/manufacture Waterpipe tobacco, however few images, and even fewer physical samples, were provided, despite specific email requests to those companies. Further details will be discussed in face-to-face meetings and others will be followed up again by email. From the information provided the indication is that the following represent the most common types:

- Fold box (with tuck top)
- Flip-top box
- Bucket

Other (cigars, cigarillos & pipe)

This is by far the broadest and most varied category, with numerous pack shapes, sizes, opening mechanisms, materials and printing processes. And whereas the category may be exempt from some warnings, the TPD indicates that the ‘full regime’ may be required by some Member States.

In these instances, it is not clear whether size, shape or opening mechanism restrictions should also apply, particularly in the case of small pack sizes. Clarification will also be required on how the TPD should be implemented on some pack types, such as shoulder hinged boxes where the lateral sides are not 16mm; individual cigar tubes; packaging which is half transparent film e.g. bundles; round tins for pipe that only have three surfaces (top, bottom and inside lid) etc.

Within the large variety of pack types, the most common indicated in this category were:

- Boxes (wood or carton)
- Shoulder hinged box
- Tins
- Cylinders
- Shell & Slide
- Pouch with flap

We have also received many more pack samples than were specified in the questionnaire responses, such as Soft packs, flow-wrap packs, tubes etc., so the 10 core packs selected in this category are a small representation of a very broad sector. However, this selection does tackle a good diversity of shape, size, opening mechanism, substrate and printing methods.

6.1.2. By type of package across all tobacco categories

Flip-top boxes

This pack type appears across all categories (other than RYO, where they do currently exist, but only hold 12.5g of tobacco), though they are most prevalent in the Cigarette category.

Flip-top packs generally have square corners, although in the Cigarette category they are also commonly found with bevelled or rounded corners. Lid heights do vary slightly, though not significantly from what we have seen and from samples provided.

TPD provisions could easily be followed on this pack type in other categories too. However, once the transitional period is over tax stamps may need to be re-sized and/or moved.

Due to the minimum dimensions of 52mm (W) by 44mm (H) for combined health warnings on unit packs of cigarettes, as stipulated in TPD II, it may be that some bevel edged packs will need to be modified, since the majority of samples provided had a flat front and back face of less than 52mm in width.

Shoulder hinged boxes

Shoulder hinged boxes are used in both Cigarette and Other (cigarillo) categories and are prevalent in both.

TPD provisions are clear for implementation on Cigarette packs, however some cigarillo packs will not have lateral sides that are deep enough to meet the 16mm minimum requirement, so clarification is required for this category.

Soft packs

This pack type appears in both Cigarette and Other (cigarillo) categories, but is most prevalent in the Cigarette category.

TPD guidance is clear for implementation on Soft packs, however it is foreseen that Tax Stamps will have to move to the lateral side of the pack and pack seals will have to be transparent, or affixed to the inner aluminium layer of the pack, rather than the outer card layer, so they do not interfere with the Combined Health Warning.

Pouches with flaps

Pouches with flaps are generally in the RYO category, but also for pipe tobacco in the 'Other' category.

There are numerous different pack types when taking into account opening mechanism (block bottom pouch with single flap, or flat pouch with wraparound flap) and substrate (paper insert, poly laminate, laminated paper), but all types are of similar size when closed.

TPD provisions are clear for implementation on RYO pouches, although it needs to be defined what is considered to be the 'most visible surface' on pouches with wraparound flap (which unrolls twice to open) – surface visible when flap lifted versus when pouch is fully un-rolled? Need to determine whether the inside of the flap constitutes part of the 'most visible surface' when the pack is open.

Several companies have already indicated that they are putting in place the extension of the flap for some pouches to allow for the Combined Warning to cover 65% of the back of pack, so this is obviously a feasible option. However, concern was raised by the industry regarding the transfer of ink on the pouch surface to the tobacco itself, as this surface is often used to portion the tobacco, prior to rolling. Tax Stamps may also need to be resized and repositioned so they will not interfere with the warnings.

Standing pouches

Standing pouches are mainly found in the RYO category, though they are also used for Pipe tobacco. However, they are not all of the same type of format – in RYO they are generally zip-

lock bags, while pipe tobacco comes in other formats such as roll-fold top, which has gusseted sides.

Zip-lock bags for RYO will present a challenge when implementing the TPD, since they only have three surfaces – front, back and bottom. The bottom of the pack is always folded as part of the production process, so the areas above and below the crease could be used for the position of the GW and IM. It may also be possible to print on the inside of the pack, however the question was raised as to whether the warnings will be visible enough or will be obscured by the tobacco itself. Since the top of pack will be torn and removed at first use, it is assumed that the zip-lock will be considered to be the top of pack for positioning of warnings, as long as no branding or logos appear above.

Where feedback has been specific, it would appear that zip-lock bags are generally printed using Flexography and it needs to be confirmed whether this method of printing can meet the minimum technical specification of 133 lines per inch.

Cylinders

Cylinders appear in all categories other than Cigarettes (and perhaps Waterpipe) and are produced from many different substrates (carton, tin, plastic) with various types of lid (from plain coloured plastic to in-mould labelling).

Since the TPD specifies that irremovable labelling can be used on all pack types other than Cigarettes and RYO in pouches, it is assumed that most General Warnings and Information Messages will be applied in this way on the lid.

For cylinders where the lid is removable, there is need to define the front and what is a back surface, since they can be opened from any side. The brand name needs to be printed in line with the warning, so the cylinder would be divided in half (TPD Article 10(1)(c)).

It has also been indicated in the questionnaires that Tax Stamps are applied randomly, which could mean they interfere with the warnings.

Boxes (wood, carton & plastic)

Boxes feature mainly in the Other category, in particular for cigars and cigarillos. Whereas they are available in a huge array of shapes, sizes and substrates, with different types of fastening, the TPD should be fairly straightforward to implement, other than where the box is smaller than requirements for Cigarettes.

For boxes made of wood etc, it is most likely that any warnings would be applied using irremovable labels.

Tins

Round, square, octagonal, rectangular and cylindrical tins are widely found in the 'Other' category, with hinged or removable lids.

It has also been indicated in the questionnaires that Tax Stamps are applied randomly, which could mean they interfere with the warnings.

6.1.3. By existing versus 'novel' across all tobacco categories and pack types

No novel pack types were provided by industry.

7. Conclusions

Authority consultation:

- At the time of the consultation, many MS had yet to make a decision on either details or format of cessation information under the new TPD, however this will be needed as soon as possible, in order to provide new technical specifications and PSD files to the industry.
- Feedback from the authorities (as well as industry consultation) indicated that Tax Stamps differ significantly in size, though most Member States were not too prescriptive regarding the position of the stamp, provided it is always damaged/torn when the pack is first opened. A full analysis of the pack samples supplied and initial thoughts on the impact of TPD II on these packs has confirmed that it is likely that Tax Stamps will need to be resized and repositioned.

Industry consultation and audit:

- Feedback and input from the industry was significantly greater than expected, with over 735 physical pack samples provided alone, so the overview has been comprehensive and on a much larger scale than anticipated. The results of the audit, as well as feedback from industry interviews, have confirmed our belief that the packs selected are representative of the most common pack types available across Europe.
- The requirements of TPD II will impact the industry as a whole and in many cases new (or modified) printing and production techniques will need to be introduced, which have time and cost implications for the industry as a whole.
- Pouches with flaps for RYO are created in various different ways, using different substrates and different print and production techniques. They also vary in length of flap and whether they are 'block bottom' or flat. This may make it more challenging to find one solution for the positioning of warnings that will fit all types and this will need consideration for WP2 and WP3.
- Whereas pack types (that will be allowable under TPD II) found in the Cigarette and RYO sectors are fairly standard and common-place, the number of different shapes, sizes and formats used for cigars, cigarillos and pipe tobacco is vast. This needs to be taken into consideration.
- As a result of industry consultation and having revisited the TPD II with each of the 25 selected packs front of mind, it is clear that whereas for Cigarettes & RYO it is specified in the TPD, the position of the general warning and information message on pack types in other product categories is left open.

Industry also highlighted that due to the different shapes and sizes of available packs on which the combined health warning will need to be applied, there is likely to be a need for PSD files of differing formats and of significantly larger resolution than the present ones.

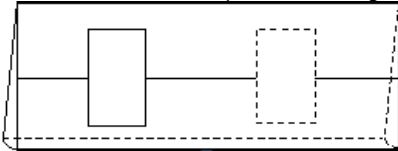
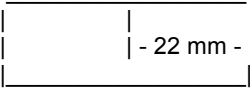
8. Annexes

8.1. Annex 1: Overview of use and location of tax stamps

MS	Location of Tax Stamps
AT	There are currently no Tax Stamps in use.
BE	For cigarettes and for fine-cut tobacco and smoking tobacco the fiscal stamp shall be put on the package in a way that the fiscal stamp always has to be torn when the package is opened so that the fiscal stamp can't be used anymore afterwards.
	For cigars there are some specific rules about the way of applying the fiscal stamp. Basically the fiscal stamp also shall be put on the package except for cigars sold by the piece; in that case it is allowed to apply the fiscal stamp on the cigar itself.
	In practice we see that in a lot of cases the fiscal stamp is not torn anymore when opening the package due to the fact that there are a lot of different forms of packages.
	In view of this practice and take into consideration the stipulations of Directive 2014/40/EU of the European Parliament and of the Council of 3 April 2014 on the approximation of the laws, regulations and administrative provisions of the Member States concerning the manufacture, presentation and sale of tobacco and related products and repealing Directive 2001/37/EC, the Belgian Excise Administration is willing to reconsider these regulations for placement of Tax Stamps in a way that shall facilitate the implementation of the above mentioned Directive and to propose an amendment of the Ministerial Decree to the Minister of Finances.
BG	The excise label shall be affixed on the consumer package in a manner displaying the information indicated there on and ensuring that it is impossible to use the good without destroying the excise label by tearing it off. This requirement is regulated by Excise Duties and Tax Warehouses Act.
CY	For the time being no Tax Stamps are used in Tobacco, the price is embossed at the bottom of each unit packet of cigarette.
CZ	Tax marking of tobacco products to be placed on the market in the Czech Republic is laid down in Act 353/2003 Coll., on Excise duties, as amended. Technical specifications, e. g. seize and security features are stipulated in Decree 467/2003 Coll., on the use of tobacco stamps for marking of tobacco products.
	Tobacco stamp is affixed to the part of the unit packet which is adapted to be opened in such a way that it is not possible to open it without visible damage of tobacco stamp. In the case of unit packet made of carton material, tobacco stamp is usually affixed on lateral side and rear side below the top edge of the unit packet, overlapped perforated surface (part adapted to be opened). In the case of unit packet made of soft material, tobacco stamp is affixed over the top edge of the unit packet with an overlap on the front and rear side by about 12 mm on each side.

This detail is based on information received from Member States, however, full verification was not possible within the framework of this contract.

DE	<p>According to § 35 (3) of the German regulation implementing the tobacco tax law manufacturers and importers are obliged to place Tax Stamps at the opening in a way that ensures that tobacco products cannot be removed without visibly breaking the Tax Stamp. Tax stamps must be fixed to the packet in a way that they cannot be removed without being damaged. Beyond that, there are no further legal requirements for the location of Tax Stamps, so that industry is responsible for the implementation. This practice has proved of value.</p> <p>§ 35 (3) reads as follows: „Hersteller und Einführer haben die Steuerzeichen an der zum Öffnen vorgesehenen Stelle der Kleinverpackung so anzubringen, dass die Tabakwaren ohne sichtbare Beschädigung des Steuerzeichens oder der Packung nicht entnommen werden können. Sie haben die Steuerzeichen an der Packung so zu befestigen, dass sie nicht unbeschädigt abgelöst werden können.“</p> <p><i>("Manufacturers and importers of the open space provided in the retail selling package to install the control characters so that the tobacco can not be removed without visible damage to the control character or the package. You have to attach the stamps on the package so that they can not be removed undamaged. ")</i></p>
DK	<p>In Denmark it is a requirement that packages of cigarettes and smoking tobacco must be affixed with a Tax Stamp.</p> <p>Cigarettes: The Tax Stamp must be affixed to the cigarette package in such a way that it cannot be removed without being destroyed. On packages which are fitted with a cellophane cover the Tax Stamp must be placed under this cover. If the cigarettes are received from abroad with a cellophane cover, the Tax Stamp may be affixed to the outer wrapper. Tax stamps for cigarette packages should generally be placed so that the seal cannot be opened without breaking the Tax Stamp. On packages of the hard box-type ie cardboard boxes with lids the Tax Stamp may, however, be affixed to the back of the package.</p> <p>Smoking tobacco: Tax stamps for smoking tobacco may optionally be placed on the bottom, the lid or the side of the package.</p>
FI	<p>Unofficial translations: Act on Excise Duty on Tobacco (1470/1994), 11 §: price tags or printed texts (including price) need to be printed on unit packets under the plastic</p> <p>Decree (641/2002) of the Ministry of Social Affairs and Health on Labelling the Unit Packets of Tobacco Products, on Maximum Yields of and Methods for Measuring Harmful Substances, and on Testing Laboratories (641/2002), unofficial translation: 8 §: The markings required by this Decree may not be printed on the price tags to be affixed to or on the text to be printed on unit packets according to section 11 of the Act on Excise Duty on Tobacco (1470/1994). Warnings and other texts shall be printed on the packets so that they cannot be detached or otherwise removed. In addition, the texts shall be printed so that they are in no way hidden, interrupted, obscured or otherwise made illegible by other written or pictorial matter or by the opening of the packet. In the case of tobacco products other than cigarettes, the texts may be affixed by means of stickers, provided that such stickers are irremovable.</p>
FR	There are no Tax Stamps in France on tobacco products.
EE	Most important is size of tax stamp 20*44 mm and if the sales packaging is covered with a transparent wrapping, the revenue stamp shall be affixed directly to the sales packaging beneath the transparent wrapping.
EL	The Ministerial Decision with Ref. No.: Φ.44/21/04.02.1994 signed by the Minister of Finance states that the stamped tapes are attached on the retail packaging of tobacco products, so as to fully ensure the content in these products and to render the opening of the package impossible without the disruption of those tapes. With regard to the issue under consideration, apart from the aforementioned specific Ministerial Decision there has not been issued any relevant explanatory circular.
ES	Tax stamp are mandatory for cigarettes and used as sealing and, because of that, they are always place by the opening place.
HR	The tobacco stamp of the Ministry of Finance shall be affixed to the pack for retail sale beneath the cellophane or other transparent wrapper so that it is visible and that it tears upon opening of the pack. In the case of manufactured tobacco in special or unusual packs, the tobacco stamp may be affixed directly on the original packing so that it is visible and that it tears upon opening, and the affixing of stamps may also be performed in the excise warehouse subject to a special authorisation from the competent customs office.
HU	The tax seal shall be attached on the packaging units of tobacco products in a manner so as to prevent having it removed without compromising its integrity, and for the seal to be broken when the package is opened.

LU	Each packet can only have one fiscal mark. The fiscal mark must ensure closing of the packet. It must be glued on its entire surface and be tightly attached to the packet. For what concerns the strip stamps themselves, the unused parts can, if needed, be cut or glued on top of one another
LV	MoH is responsible for the implementation of directive in general, but the location of Tax Stamps is the responsibility of MoF. However MoH has discussed to MoF on possible new place of location of Tax Stamp on the package. MoF asked for transitional period and they will amend their legislative acts to implement TPD. MoH has informed the industry on this issue.
MT	Malta Customs Department is responsible for providing the industry for detailed specifications. Tax Stamps must not hide health information. Excise Tax Stamps for Manufactured Tobacco Products are currently fixed only on Cigarette Packets and this is obliged by Law. The manner in which such Excise Tax Stamps are obliged to be affixed is indicated specifically in the 'EXCISE DUTY ACT' – CAP 382 of the laws of Malta. The exact location where one may find such indications is the: EXCISE DUTY ACT – CAP 382, SIXTH SCHEDULE, PART C, REGULATION 6(1). A copy of the Excise Duty Act is herewith attached for your perusal (refer to page 54).
NL	Tax stamps should be placed at the opening of a pouch or other kind of tobacco packages in such a way that all warnings are visible.
NO	No Tax Stamp
PL	Under Polish provisions in force, packs of tobacco should be marked with Tax Stamps. There is a detailed specification in the regulation of the Minister of Finance concerning the placement of Tax Stamps on tobacco packs. The figure below shows the way of affixing Tax Stamps with an appropriate adhesive to a tobacco pack. Measuring 45 x 22 mm, the Tax Stamps are to be affixed directly to tobacco packs, in shape of letter „I”, vertically on the closure of the pack and in parallel to shorter side of the pack, on its right or left side 
PT	“Regarding the location of Tax Stamp, nowadays (which means before the implementation of Directive 2014/40/EU), there are just two requirements for the industry: 1. The Tax Stamp should not be reutilized. In other words, Tax Stamp must be unused when the consumer opens the tobacco package. 2. If the tobacco package is wrapped with cellophane, the Tax Stamp must be affixed under the cellophane film.”
RO	The legal provisions regarding the placement of Tax Stamps in Romania are included in the Law no 571/ 2003 (art. 206) – the Fiscal Code – and are the following: - The Tax Stamps have the following dimensions: - 45 mm -  - 22 mm - - the legal person responsible with the paying of the taxes has the obligation to apply the Tax Stamps in a visible place on the individual package of the product (pack, box) as to be destroyed at the opening of the package. - The Tax Stamps are value papers with a special regime (secured regime) and are printed only by the National Company „Imprimeria Nationala” („National Printing House”).
SE	SE do not require Tax Stamps showing the payment of tax. The cigarette package has instead a special marking indicating its retail price.
SI	Accordingly to the Article 52 of the Excise Duty Act tobacco stamp shall be affixed on the packaging, beneath the cellophane or other wrapping, to be visible and not removable without damaging the packaging, except where the cigars, cigarillos, fine-cut tobacco and other tobacco for smoking are originally packed without the cellophane or other wrapping, in which case the tobacco stamps shall be affixed directly on the package.

SK	<p>The Tax Stamp shall be affixed on the consumer package of cigarettes on the part aimed at opening so that the cigarettes cannot be taken out without visible damage to the Tax Stamp or consumer package of cigarettes, while for consumers package of cigarettes at the opening must remain intact at least one part of the Tax Stamp, where the rate of the cigarettes is indicated. Only one place for opening is allowed for the consumer package of cigarettes. The Tax Stamp cannot be easily removed without being visibly damaged or without visible damage to the consumer package of cigarettes. If is for the consumer package of cigarettes also used a transparent cover, the Tax Stamp shall be stuck underneath this cover.</p>
UK	<p>The fiscal mark is not a Tax Stamp and we do not use Tax Stamps for tobacco products in the UK.⁴</p> <p>In the case of cigarette packets, the mark must be positioned wholly and centred (horizontally and vertically) in the top third of the back face of the packet and comply with the following specification:</p> <ul style="list-style-type: none"> • for rectangular packets with a back face dimension of between 83-89 millimetres (mm) by 55-61 mm the text must be in font size 14 contained in a rectangular box which including the border is not less than 40 mm wide and 10 mm deep • for rectangular packets with a back face dimension of between 83-89 mm by 39-45 mm the text must be in font size 11 contained in a rectangular box which including the border is not less than 30 mm wide and 10 mm deep • for rectangular packets whose size differs from those above the mark (including the black border) must occupy an area not less than 7.5% of the total surface area of the back face of the packet • the text of the mark must occupy not less than 50% of the area of the rectangular box (including the black border) it is contained within. The area occupied by the text is to be defined by a rectangle drawn closely round the periphery of the printed letters. <p>For non-rectangular packets of cigarettes the mark must comply with the following specification:</p> <ul style="list-style-type: none"> • the mark must be in proportion to the overall surface area of the packet in line with the requirements for the packets laid down in paragraphs 2 and 3 above • the mark including the black border must occupy an area not less than 3.75% of the total surface area of the packet on which it is printed • the mark must be positioned conspicuously in the top third of the packet, and • the text of the mark must occupy not less than 50% of the area of the rectangular box (including the black border) it is contained within. The area occupied by the text is to be defined by a rectangle drawn closely round the periphery of the printed letters <p>For non-rectangular packets of hand-rolling tobacco the mark must comply with the following specification:</p> <ul style="list-style-type: none"> • the mark must be in proportion to the overall surface area of the packet in line with the requirements for the packets laid down in paragraphs 2 and 3 above • the mark including the black border must occupy an area not less than 3.75% of the total surface area of the packet on which it is printed • the mark must be positioned conspicuously in the bottom third of the packet, and • the text of the mark must occupy not less than 50% of the area of the rectangular box (including the black border) it is contained within. The area occupied by the text is to be defined by a rectangle drawn closely round the periphery of the printed letters <p>For packets of hand-rolling tobacco where the size and shape of the pack is such that the health warning on the packet is required to be placed where section 6 above requires the fiscal mark to be located, the mark must comply with the following alternative specification:</p> <ul style="list-style-type: none"> • the mark must be in proportion to the overall surface area of the packet in line with the requirements for the packets laid down in paragraphs 2 and 3 above • the mark may be positioned wholly and centred (horizontally) on any single external face of the packet • the mark (including the black border) must occupy an area equivalent to not less than 3.75% of the total surface area of the back face of the packet, regardless of which face it is positioned on. The text of the mark must occupy not less than 50% of the area of the rectangular box (including the black border) it is contained within. The area of the text is to be defined by a rectangle drawn closely round the periphery of the printed letters

⁴ <https://www.gov.uk/government/publications/excise-notice-476-tobacco-products-duty/excise-notice-476-tobacco-products-duty#annex-1--specification-of-the-fiscal-mark>

Annex 2- Public authority email

Public authority questionnaire

In the context of the revised Tobacco Products Directive (TPD- 2014/40) and in view of the need to produce guidance for industry on the implementation of warning messages on tobacco packages, according to the provisions of this Directive, the European Commission has asked a consortium of organisations to provide an overview of the range of pack types, formats, shapes and sizes to which the technical specifications and positioning proposals will need to be applied.

*In the context of this important study, we would like to ask for your kind cooperation. Please fill in and return the short questionnaire below to us at WARNINGS@TPDCONSORTIUM.EU. **All information provided will be used only for the purpose of drawing up the guidance document and it will not be used outside the context of this study.***

LOCATION OF TAX STAMPS

- 1) Can you please provide the detailed specifications that you provide to industry for placement of tax stamps in your country (if any)?
- 2) How, in your view, should the position of tax stamps be handled under the requirements of the revised TPD?

TYPE OF CESSATION INFORMATION

- 3) Since cessation information will now be included within the combined warnings, what details are you planning to include [e.g. quitline/website/other (specify)]?
- 4) Do you have a preferred format for this information (phrase/sentence, numbers or both)

COMBINED WARNINGS EDITING GUIDANCE DOCUMENT

- 5) Has there been any confusion (that you are aware of) with the existing Combined Warning Editing Guidance Document?
- 6) How is the existing Combined Warning Editing Guidance Document used in most instances – digitally as a PDF on screen or printed as a hard copy?

FINAL REMARK

- 7) Do you know whether any manufacturers provide retail guidelines on how their packs should be merchandised (eg orientation on shelf)?

Annex 3- Industry input email

Industry questionnaire (packers, manufacturers and their representatives)

In the context of the revised Tobacco Products Directive (2014/40/EU), the Chafea has asked a consortium of organisations led by Burson Marsteller to prepare relevant input for the following legislative/semi-legislative tasks: (1) technical specifications for combined health warnings, (2) positioning of warnings on RYO tobacco sold in pouches, and (3) guidance document for industry when implementing the rules on combined warnings. This mirrors the immediate tasks of the Commission under the new TPD to prepare implementing and delegated acts in the area of labelling and packaging and responds to repeated demands of certain stakeholders to receive guidance on these matters.

*In the context of this important study, we would like to ask for your kind cooperation. In this first stage, we ask for your assistance for preparing an overview of available packages by filling in the very short questionnaire below and returning it to us at WARNINGS@TPDCONSORTIUM.EU. **All information provided will be used only for the purpose of this study and the subsequent preparation of the legislative/semi-legislative acts (see context above). It will not be used outside the context of this study and will not be disclosed unless there is a legal obligation to do so.***

*Following this initial input, and based on the responses received, we are also planning a number of physical meetings in Brussels as a follow up to the questionnaire, as well as additional input regarding key aspects of the draft technical specifications. **Those invited for interview will be expected to bring physical examples of packages on the market or envisaged to be placed on the market after May 2016.***

Replies to sections 1 and 2 should be sent by 5 December 2014. For sections 3 and 4 an extended deadline of 12 December applies.

• Background / about you

- Contact details
 - Please indicate your contact details (name/email)
 - Can we contact you in future requests within the context of this study (yes/no)?
 - Would you be prepared/interested in participating in a physical meeting in Brussels in December or January – see also introduction (yes/no)?
- In what area is your company/organisation active:
 - manufacturing of cigarettes, RYO, waterpipe, other (cigars, cigarillos, pipe) - multiple answers possible
 - print/production of packaging for cigarettes, RYO, waterpipe, other (cigars, cigarillos, pipe) – multiple answers possible
 - other (please specify)
- In how many EU Member States is your organisation active? (please indicate by using the standard acronyms: EU all, AT, CZ, DE, DK, etc.) – multiple answer possible
- *(For manufacturers not involved in packaging themselves):* If you purchase packages from a third party, please indicate name and contact details.
- Is there anyone else we should contact within your supply/production chain to answer any of the questions below? Please indicate contact details:

• **Package-specific questions**

- For each of the product categories (cigarettes, RYO tobacco, waterpipe, cigars, cigarillos or pipe), which types of packages do you produce/use (tick all that apply):

Type of pack	cigarette	RYO tobacco	waterpipe	cigars	cigarillos	pipe
Flip-top boxes						
Shoulder hinged boxes						
Soft packs (box)						
Pouches with flap						
Standing pouches						
Cylinder						
Wooden boxes						
Boxes (other)						
Tins						
Outer packaging (eg cartons) in which products are placed on the market (please specify types)						
Other (specify)						

- For each of the above package types (per product category), please provide pictures and graphical representations and, where readily available, cutter guides.
- Where readily available, please provide your print/production specifications for the different types of packages
- For each package type where this detail has not already been supplied above, please describe the following:
 - pack shape and dimensions
 - opening mechanism
 - materials used; and
 - any other relevant information.

• **Production-specific questions**

- What type of printing method do you use?
 - Lithography offset
 - Flexography
 - Gravure
 - Plateless/digital
 - Letter press

- Screen printing
- Other (please specify)

- If you print on tin/metallic surfaces, do you use:
 - Sheet printing
 - Coated metallic sheet printing
 - Curved Surface printing
 - Labelling
 - Other (please specify)
- What type of substrate do you print on? Please also indicate weight/finish as applicable.
 - Paper (coated or uncoated?)
 - Metallised paper
 - Thin card
 - Cardboard
 - Plastic (please specify)
 - Thin metal (tin)
 - Other (please specify)
- What colour is the original substrate?
 - White
 - Clear
 - Single colour (please specify)
 - Other (please specify)
- Do you have to underprint white for text/images to stand out?

- What is the maximum number of colours that you can print?

- Do you have any post-press operations/finishes that may have an implication/effect on the print?

- **Final remark**
 - Have you already taken preparatory action to implement the new requirements for warning messages? (please specify)

Thank you very much for your collaboration!

Annex 4- Industry consultation overview

(Annex removed to protect confidential information)

Annex 2

D3 report:

Proposals for the position of warnings on RYO tobacco pouches

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1. Introduction

This document is deliverable D3 for the above contract 2014 71 02 concerning technical specifications and guidelines for the use of warning messages on tobacco packages.

The project will propose alternatives for the precise position of the general warning and the information message on roll-your-own (RYO) tobacco marketed in pouches, taking into account the different shapes of pouches on the EU-market to assist the Commission implement Article 9(6) of Directive 2014/40/EU.

It should therefore be noted that the work in this report consists of proposals to the European Commission.

This document presents the proposals for work package 2 (proposals for the position of warnings on RYO tobacco pouches).

The document is structured as follows:

- Section 2 presents the methodology undertaken to provide the proposals for the position of the General Warning and Information Message on RYO pouches under work package 2;
- Section 3 presents an overview of the different RYO pouch types identified, common production processes and points to consider following the audit of physical packs in WP1 and consultation with stakeholders; and
- Section 4 shows proposals for the precise position of the General Warning (GW) and Information Message (IM) on RYO tobacco in pouches, as well as an evaluation of each option.

2. Methodology

This section presents the methodology for work package 2 of the above contract.

This work package provides proposals for the exact position of the General Warning (GW) and Information Messages (IM) for RYO tobacco sold in pouches, taking into account the different RYO pouch types and shapes established in WP1.

Positioning proposals were based on findings and feedback from WP1:

- industry stakeholder questionnaires (40 companies responded)
- face to face interviews with the industry (representatives from 10 companies interviewed)
- pack samples supplied (over 735 samples from 25 companies)
- public authority questionnaires.

This analysis stage established three distinct types of pouch – wrap-around pouches with flap, flat bottomed pouches with flap and standing pouches and highlighted the varying printing and production methods, technical constraints and specific characteristics of different packs (see Section 3). The wide variance in sizing of Tax Stamps was also highlighted, following consultation with public authorities and additional feedback from the industry.

Stakeholder consultation was carried out in advance of WP2, so that the specific technicalities of RYO pouches, the various substrates used and numerous production methods (and constraints) could be established. The key RYO pack types selected in WP1 were discussed in detail with the technical representatives of the tobacco companies that were interviewed, to gain a better understanding of potential placement of TPD-compliant warnings, with the stakeholders providing evidence for any concerns that they had (e.g. technical challenges, costs, etc.). These were further discussed at a meeting with one of Europe's leading manufacturers of RYO flexible packaging.

The variation in size of Tax Stamps, application methods and positioning tolerances were also discussed in detail with the technical representatives of the tobacco producers/manufacturers.

Where possible, alternative solutions were created, taking into consideration the different surface areas of the pouch.

For all wrap-around pouches with flaps, proposals were based on a pouch with an extended flap, since our analysis of pack samples supplied, as well as widespread feedback from the industry, indicated that it is likely that this will be necessary to accommodate a Combined Health Warning (CHW) that covered 65% of the front and back of the pouch.

Initial proposals for the positioning of the General Warning and Information Message was shared with the Commission in the WP1 Review Meeting, taking into account the specific characteristics of the three different key pack types identified – shape, format, flaps, sealing options etc. Feedback from that meeting was then incorporated into the final proposals.

In each case, proposals were visualised on a black and white line drawing, showing the General Warning message – 'Smoking kills' – and Information Message – 'Tobacco smoke contains over 70 substances known to cause cancer' – using the Helvetica Bold typeface, in white boxes with a 1mm black border, as described in Article 9 of the TPD. Since the 'design style' for the Combined Health Warning message will not be established until WP3, these warnings were visualised as a simple black box.

To further illustrate each proposal when sharing with the Commission, warnings were affixed to physical pouch samples to show the proposed positions of the warnings. For wrap-around pouches with flaps, the mocked-up samples also accommodated an extended flap to illustrate the position of the CHW.

Once the proposals had been established, an assessment was made against each, noting its positive and negative attributes, such as:

- Whether one proposal offered far stronger stand-out of message compared to another?
- What the visibility of the warnings was when the packs are closed versus when they are being opened?
- Whether the opening mechanism of the pouch affected the visibility of some (all) messages?
- Whether the position of one warning message decreased the visibility of another?
- Whether it was felt that the positioning of any (all) of the warnings might have an impact on the packaging material(s) &/or production process(es) used in manufacturing (following feedback from stakeholders in WP1, as well as the examination of physical packs)?

An evaluation was then made for each proposal and, where applicable, different options compared to highlight advantages and disadvantages of each option with regard to the size and visibility of the warnings.

The annotated visuals of the preferred proposals were presented to the Member States at the 2nd Meeting of the Expert Group on Tobacco Policy on 13 March 2015 as agreed with the Commission, as well as the evaluation of each option and the estimated impact that the new placement might have on production, based on input from interviews with the stakeholders.

Please note: Whereas Butcher & Gundersen have a broad experience of packaging types, print methods and substrates, they are not experts in the field of print and production of tobacco packaging. Therefore, all proposals and guidance given in this document are based on feedback from questionnaires and face-to-face interviews with the industry experts and national regulators, as well as physical examination of pack samples supplied.

3. Key types of RYO tobacco pouches identified, potential issues raised and points to consider

Following an analysis of around 90 RYO pouch samples supplied by the industry, it was established that there are 3 different key types available:

1. Wrap-around pouch with flap (opened in two steps)
2. Flat bottomed pouch with flap (opened in one step)
3. Standing pouch.

Within each of these categories, there are variants in size, substrate used and production method, as detailed in sections 3.1, 3.2 and 3.3 below.

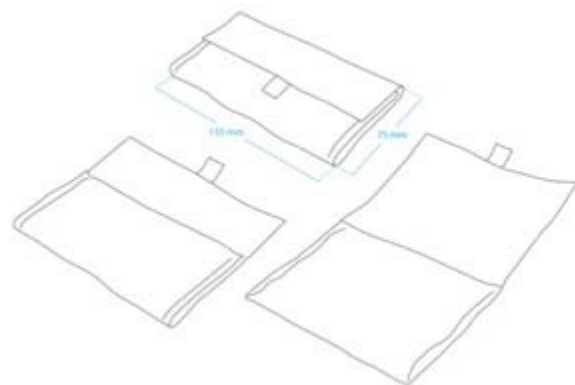
Meetings were held with industry stakeholders to discuss this selection. Technical representatives of the companies were asked to explain the different production methods, materials and printing constraints of each type of pouch, as well as share any initial thoughts on how TPD II might impact these pack types. Whereas there are numerous variants of these pouch types, it was generally agreed that these 3 types were largely representative of the RYO tobacco in pouch market and the layout of warnings could be easily extrapolated from these on to other pouch types.

3.1. Wrap-around pouch with flap

These pouches are also referred to as 'flat' pouches, 'roll' pouches or 'non-gusseted' pouches. They are available in numerous sizes, ranging from 125-155mm wide (and 65-80mm high), though most pouches are either (in the region of) a standard 135mm or a wider 150mm type. Flap sizes also vary from around 40-45mm.

As the name suggests, wrap-around pouches open in two stages. When the flap is lifted, the outside of the pocket is revealed and the flap further unwraps to access the tobacco.

In some instances the pocket has a zip lock, but in most cases it is heat-sealed to retain the integrity of the tobacco, however this is not re-sealable once the pocket has been opened.



Material and production process

Wrap-around pouches are commonly produced in 2 ways:

- **Film/laminate:** 1-, 2- or 3-layer film (or film/paper) which is directly printed; the printed surface of 2- and 3-layer types are then laminated with an outer layer(s) of film.
- **Paper-insert:** comprising a paper label that is sealed between two layers of transparent film. In this instance it may be the paper insert, outer film or both that is printed.

In most cases, pouches are sealed with a transparent self-adhesive tab, though one sample pack received was sealed with a Velcro closure instead.

Wrap-around pouch with flap – potential issues and points to consider

Surfaces that ensure full visibility

Following the audit of pouches provided in WP1 and having studied the requirements of TPD II, the options for ‘surfaces that ensure full visibility’ (Article 9.3) were considered for the position of the General Warning and Information Message.

Ink migration

Due to the roll-fold nature of wrap-around pouches, various surfaces could be considered for the positioning of warnings, including the inside surface of the flap which (from the examples seen) is generally unprinted. When discussed with industry, many stakeholders highlighted the fact that this surface is commonly used for portioning or rolling tobacco, and they would therefore be concerned that on 1- and 2-layer film/laminate pouches, if that surface was printed, ink could migrate to the tobacco and cause issues with product integrity, as well as health and safety.

This would not be an issue for paper-insert pouches, since the printed (paper) surface was sealed between transparent film, and where the film itself is printed, it is printed on the inside, so there would not be an issue with ink migration.

Printing on the inside of the flap

The inside surface of the pouch flap was discussed in detail in all stakeholder interviews, to understand the feasibility of using this surface for warnings and to understand the parameters of the various production techniques currently used, particularly since this area was un-printed in all but two of the samples provided.

Whereas paper-insert pouches appear to be fairly standard in their production, with the main difference being in whether it is the paper insert &/or outer film that is printed, film/laminate pouches are produced in numerous different ways, some of which would be possible to ‘reverse print’ (print on the inside of the flap) and others that would not.

From feedback gathered from industry interviews, as well as discussions with one of Europe’s leading manufacturers of RYO flexible packaging, there are three main methods used for the production of film/laminate pouches:

- **1-layer/monofilm** (polyethylene/poly pouches), which (at a rough estimate) account for around 40% of the film/laminate pouch market
- **2-layer laminate pouch**, which account for roughly 30% of the film/laminate pouch market

- **3-layer laminate pouch** (single-sided printing), which roughly account for the remaining 30% of the laminate pouch market. Some 3-layer laminate pouches with double-sided/reverse printing are already available on the market, however only 2 examples were supplied in the audit of WP1, from the 49 samples sent.

Of these methods, our understanding is that it is only possible to print on the inside of the flap on the more complex 3-layer pouches, that provide a more opaque finish and utilise a more expensive printed metalised middle layer, as well as an outer untreated layer that is sealable, thus eliminating the issue of ink migration or 'show-through'.

If printing on the inside of the flap was a requirement for the implementation of Article 9 on RYO in pouches, it is likely that all laminate pouches would need to be produced using 3-layers, which would according to industry, result in a increase in both cost and material used, due to the use of more expensive material and additional steps in the production process. Estimates by two of the industry representatives indicated that this could be in the region of 2-3 times the cost of pouches that are currently 1-layer; 1.5-2 times the cost of pouches that are currently 2-layer; and around 1.5 times the cost of pouches that are currently 3-layer, but single-sided printing, since they would still require additional printing and laminating steps in the production process. Any investment in production costs would be in addition to the initial investment required for set-up and minimum order quantities would also have cost implications. After further contact with the industry, some further estimates were indicated but it is not possible to tell whether these are significant because the industry did not provide any information to the Consortium regarding the actual cost per pouch.

Registration and alignment issues were also raised, since reverse printing requires the 'planned-up' pouches to be flipped and the different layers aligned, with the stretchiness of the substrate meaning that it is not always accurate. The additional waste created due to the running-in of material and matching of outside and inside layers, as well as the need for a middle metalised layer, may also have an environmental impact, according to several companies. An additional investment may also be needed to include metal-detection equipment on all pouch production lines.

One company had investigated alternative solutions to utilise 2-layer pouches, by extending the flap to fold back on itself and sealing flat, thus allowing for warnings to be positioned on the inside of the flap, without the requirement for reverse printing. However, this increased the amount of waste material on production, as well as cost, so the company would need to consider in more detail whether this would be a practical option for them.

For paper-insert pouches, it was indicated that the paper currently used may need to be of a heavier weight 2-side coated paper, to avoid 'show-through' of print, which will have cost implications and could have a negative effect on environmental targets, due to an increase in the label weight by around 5%. It was also highlighted that tolerances for the alignment of coated paper under printed film may be affected due to the different friction qualities of coated paper, which in turn makes it difficult to accurately control the placement of the CHW through the film window on the finished product. While still printable, it may be difficult to accurately print to the full width of the pouch.

Length of flap

In interviews, industry representatives indicated that having studied TPD II, they were anticipating that the length of flap on the majority of wrap-around pouches would be too short to fit a full Combined Health Warning that equated to 65% of the surface. Many of the companies interviewed had therefore indicated that they were already looking in to, or had

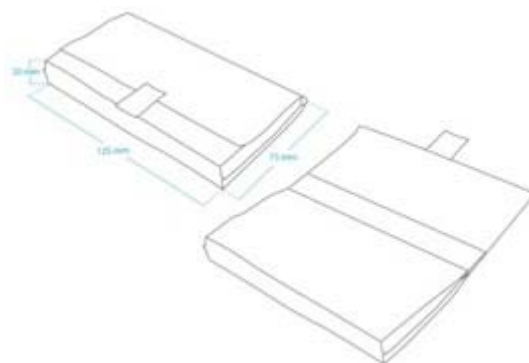
already invested in, extending the length of the flap, since they could not see any other solution that would be compliant with the TPD. The amount by which the companies were looking to extend the flap varied from a few mm up to around 25/30mm which would cover approximately 90% of the pocket surface. It was indicated that it would not be possible to have a flap that covered 100% of the pocket, because a 'landing zone' is required for the application of the Tax Stamp and self-adhesive seal.

However, companies also reported that this change may incur considerable expense and lead time.

One company suggested that instead of lengthening the flap, the CHW could be printed both across the flap, onto the pocket, as well as fully onto the pocket. And whereas this would mean the warning would be split, by having the whole warning printed underneath the flap, the warning would remain intact when opening the pack. However, due to varying tolerances in the printing and folding of pouches, it may not be possible to guarantee the alignment of warnings across the split, which could distort the Combined Health Warning when the pack is closed.

3.2. Flat bottomed pouch with flap

These pouches are also referred to as 'block bottom' pouches or 'side-folded' pouches. The majority are of a standard 125mm wide by 75mm high dimensions, with some variation by a few mm. In most samples provided, the flap measures 45-55mm, however in a few cases, the flap is as long as 80-90mm and folds back on itself. This is generally a preference in regions where the flap is widely used for rolling or portioning the tobacco, such as in Scandinavia and Benelux.



Unlike the wrap-around pouches, flat bottomed pouches do not un-roll. The flap simply lifts (in one step) to reveal the pocket, which has a squarer structure and flatter sides and base.

Material and production process

Flat bottomed pouches are always produced as paper-insert, where a paper label is sealed between two layers of transparent film. In some types of paper-insert pouches the insert is printed, in others the outer film is printed (on the inside) and in some cases, both the paper insert and film are printed (or part-printed).

Like the wrap-around pouches, the inner surface of the flap is often used by the consumer for portioning or rolling their tobacco, and some types have a longer flap that folds back on itself, as mentioned above.

These pouches are generally sealed with a self-adhesive tab which, in most instances, is transparent, though on one sample seen, the tab was printed with the barcode.

Surfaces that ensure full visibility

It was also discussed that whereas flat bottomed pouches could be considered to have 'lateral sides', the way these sides are printed and constructed, as well as the production tolerances, would make it technically challenging to print and ensure legibility and/or alignment of any messaging. The flat bottom could provide a surface on which warnings may be applied, however, its small size would lead to reduced visibility of the warnings.

Ink migration and printing on the inside of the flap

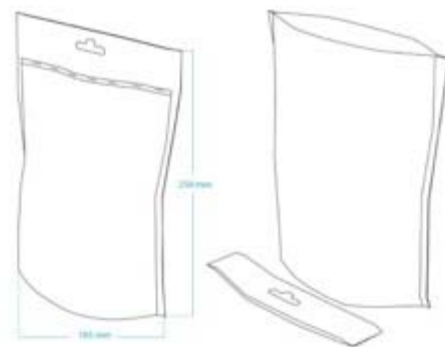
The issue of ink migration was also raised on flat bottomed pouches however, as with paper-insert wrap-around pouches, if printing on the inside of the flap was a requirement for the implementation of Article 9 on RYO in pouches, our understanding is that this should not be a problem, provided either the paper insert is printed and/or the film is printed on the inside, as per the examples seen.

Comments regarding the need for heavier 2-side coated paper and concerns around accuracy of alignment would also apply, as with the wrap-around paper-insert pouches (see Section 3.1).

3.3. Standing pouch

Standing pouches (or 'zip bags') are available in numerous sizes. The smallest size supplied was 180mm high x 155mm wide and the largest was 355mm x 230mm. For the purpose of this exercise, a mid-sized example was selected that measured 250mm x 185mm.

These pouches have a removable strip that is either cut or torn to open and then discarded. The pouch is then re-sealed with a zip lock.



Standing pouches are always produced as printed laminate, which is then shaped and sealed so that it can stand.

Surfaces that ensure full visibility and ink migration

Due to the nature of standing pouches, which have no lateral or top surfaces, options for the position of the General Warning and Information Message are limited to the surfaces on the base of pack or, possibly, the inside surfaces of the pack.

From the samples provided, some standing pouches are already branded on the base so these surfaces is an option for printing of warnings, though some technical representatives of the industry did highlight that the sealed areas (that seal to form the base) should be avoided, due to print tolerances and possible distortion of any text/graphics.

Whilst the option of printing on the inside of the pouch could be considered, it was questioned how visible this would be when the pack was full. The constraints of such reverse printing may make this technically difficult and require a change in materials, since pouches are currently produced as 2-layer laminate, and would need to move to 3-layer laminate, to avoid issues with ink migration and for sealing capability.

4. Proposals for the precise position of the General Warning (GW) and Information Message (IM) on RYO tobacco in pouches

We have considered different options for the positioning of the General Warnings and Information Message for RYO tobacco in pouches. All proposals are based on the dimensions of different surface areas when the pack is closed.

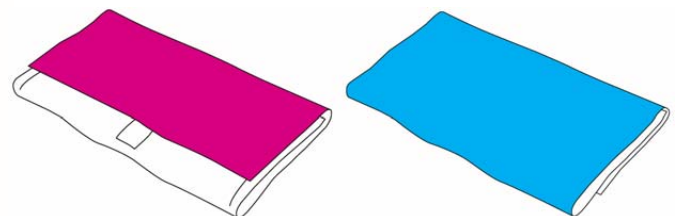
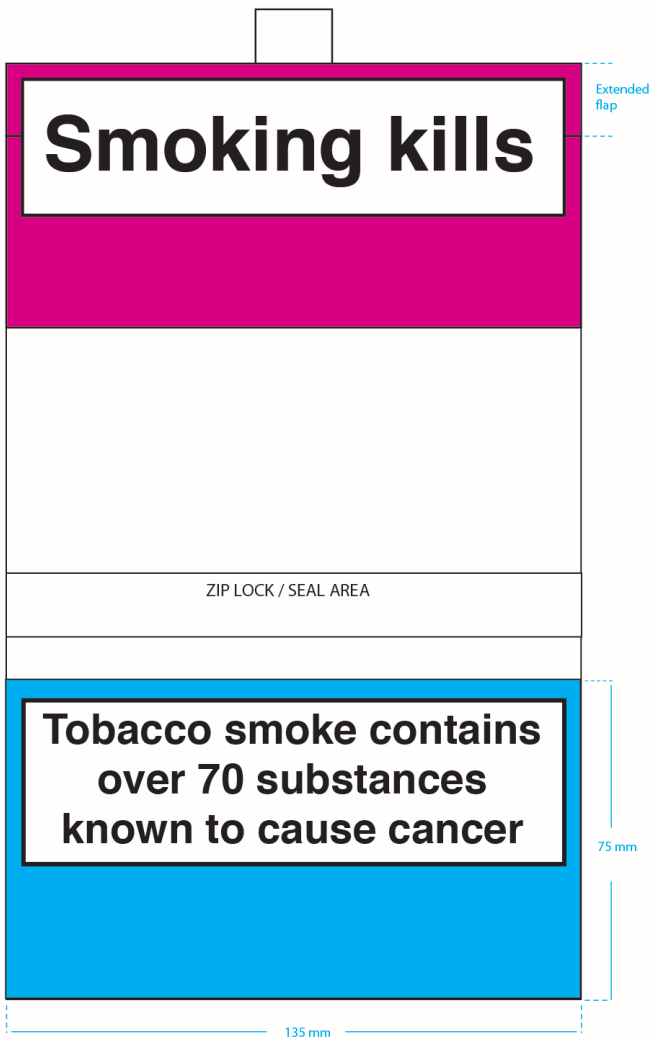
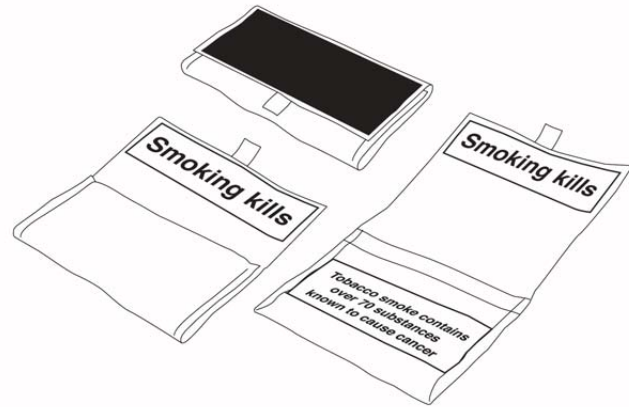
4.1. Position of GW & IM on wrap-around pouches with flap

For wrap-around pouches with a flap, calculations for the size of warnings have been based on one of the most common pack size identified – 135mm (W) x 75mm (H) (when closed). Calculations (and the indicative position of the Combined Health Warning) are also based on the assumption that the flap will need to be extended on these pack types (as described in Section 3.1), to allow for a 65% Combined Health Warning.

4.1.1. Wrap-around pouch with flap: Option 1

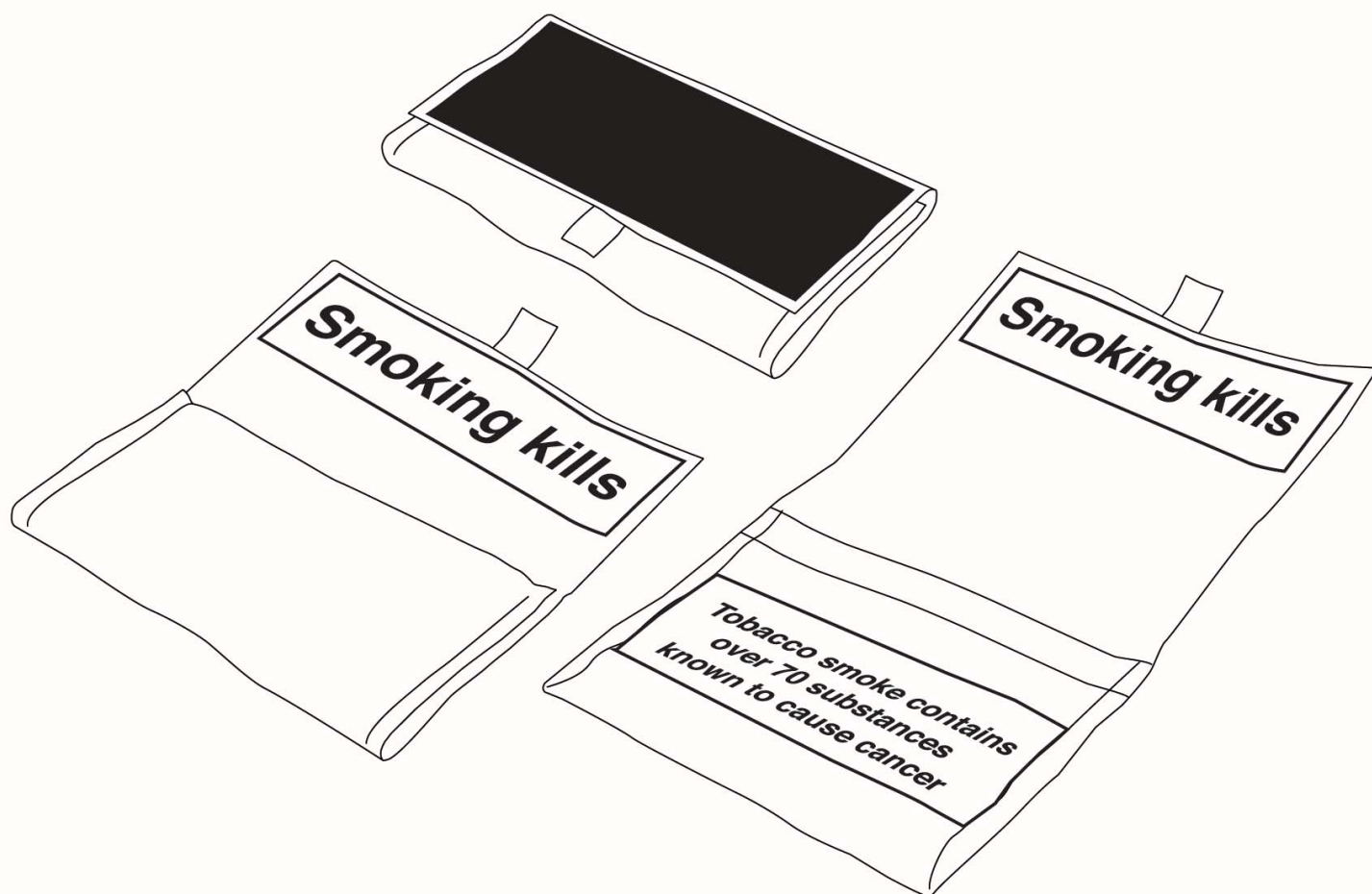
Option 1 utilises the inside of the flap, to allow for visibility of both the GW and IM at the same time. Because the inside of the flap is often used for portioning the tobacco, by utilising these surfaces, the warnings are fully visible whilst the pouch is in use.

The GW is positioned on the inside flap that is visible when the flap is lifted, but calculated based on the flap area when the pouch is closed. The IM is positioned on the pocket when the pouch is fully un-rolled, but calculated on the pocket area when the pouch is closed.



- Surface calculated:** Flap area when pouch closed
Position of warning: Inside of flap when pouch fully un-rolled (within the area calculated when pouch closed)

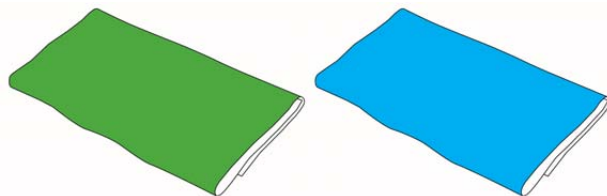
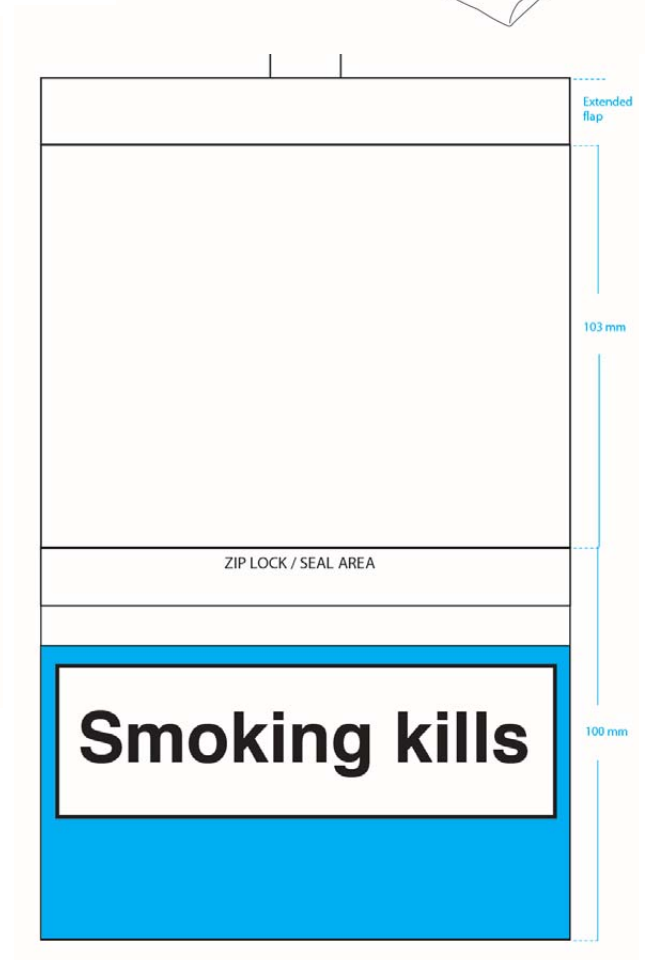
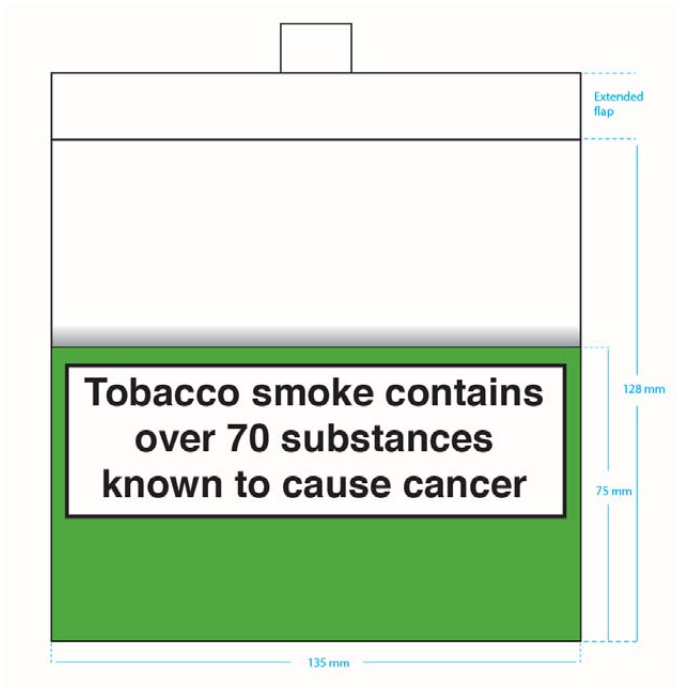
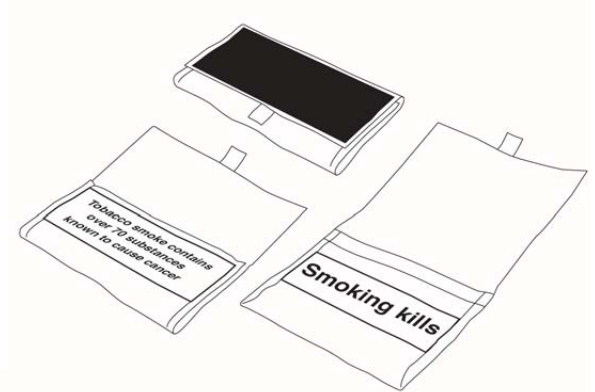
- Surface calculated:** Pocket area when pouch closed
Position of warning: Pocket area when pouch fully un-rolled (within the area calculated when pouch closed)



Wrap-around pouch with flap: Option 1			
Percentage of pack surface covered by warning	CHW: 65% of front and 65% of back surfaces	GW: 50% of flap area (calculated when pouch closed)	IM: 50% of pocket area (calculated when pouch closed)
Evaluation/assessment of warning visibility	Closed: Only CHW visible, from both front & back		In use: CHW no longer visible; GW visible when flap lifted; both GW & IM fully visible when pouch fully open/un-rolled and in use
How position of warnings influence each other	Position of CHW on both outer surfaces means that GW/IM only visible once pack being opened/open. GW prioritised to be visible when flap lifted and still visible when pouch fully un-rolled, when the IM can also be seen.		
Does the opening mechanism of the pouch affect the visibility of any/all of the warnings?	The flap is generally sealed with a transparent self-adhesive tab. Since these are transparent, they should not affect the visibility of the CHW. However, in one instance, a Velcro closure was used, the position of which may interfere with the GW on the inside of the flap, in which case it would need to be removed or relocated.		
Estimated impact of warning placements on manufacturers (materials &/or production processes)	In most cases, it is likely that the flap will need to be extended to accommodate a CHW that covers 65% of the opening side. From our understanding, pouches currently produced using 1- or 2-layer film/laminate, will need to become 3-layer laminate, in order to print on the inside of the flap and avoid ink migration issues and 'show through' (see Section 3.1), which may have some cost, environmental and waste implications. Paper-insert pouches should be impacted less by printing on the inside of the flap.		

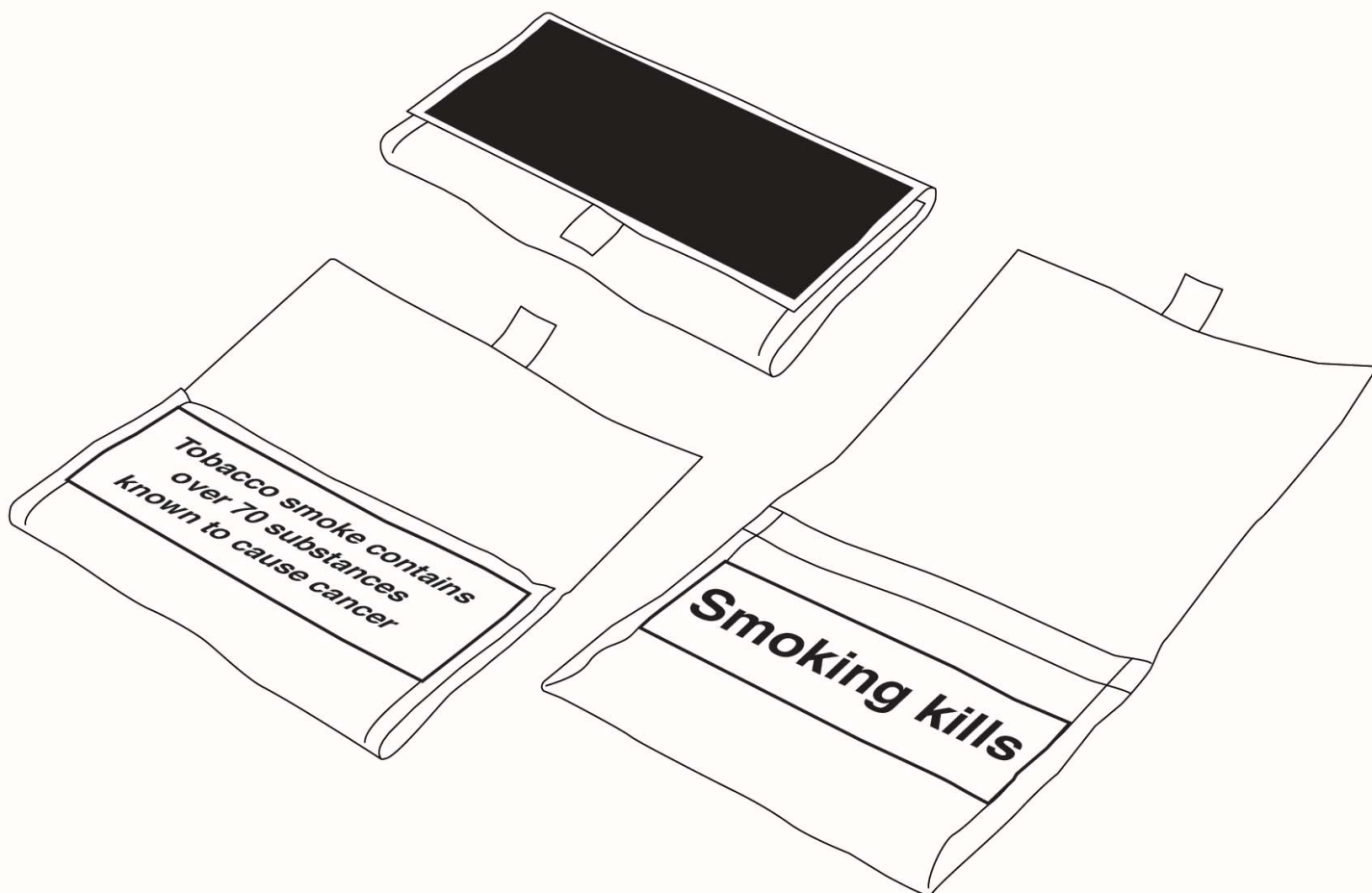
4.1.2. Wrap-around pouch with flap: Option 2

This option utilises the pocket to carry both warnings. However, whilst the General Warning is visible once the pouch is fully un-rolled and in use, the Information Message can only be seen when the flap is lifted and the pouch is being un-rolled, making it less visible.



- Surface calculated:** Pocket area when pouch closed
Position of warning: Outside of pocket when pouch partly un-rolled

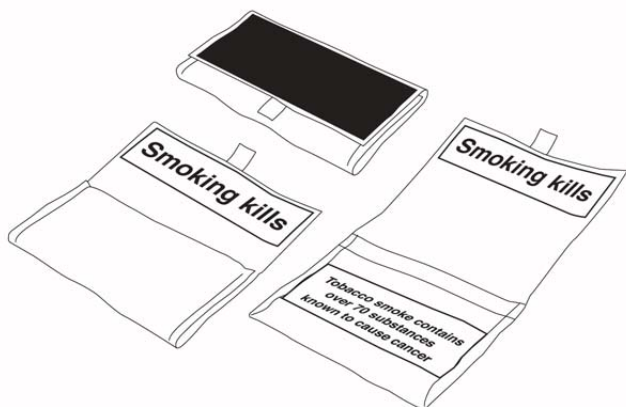
- Surface calculated:** Pocket area when pouch closed
Position of warning: Pocket area when pouch fully un-rolled (within the area calculated when pouch closed)



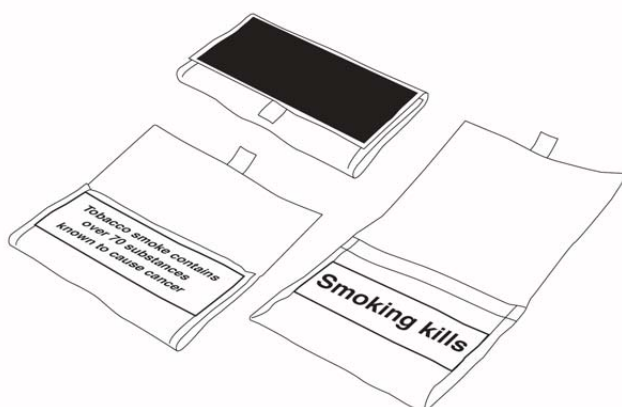
Wrap-around pouch with flap: Option 2			
Percentage of pack surface covered by warning	CHW: 65% of front and 65% of back surfaces	GW: 50% of pocket area (calculated when pouch closed)	IM: 50% of pocket area (calculated when pouch closed)
Evaluation/assessment of warning visibility	Closed: Only CHW visible, from both front & back		In use: CHW no longer visible; IM visible when flap lifted; only GW visible when pouch fully open/un-rolled and in use
How position of warnings influence each other	Position of CHW on both outer surfaces means that GW/IM only visible once pack being opened/open. Without utilising the inside of flap, it's not possible for GW and IM to appear together. GW prioritised to be visible when pouch is in use.		
Does the opening mechanism of the pouch affect the visibility of any/all of the warnings?	The flap is generally sealed with a transparent self-adhesive tab. Since these are transparent, they should not affect the visibility of the CHW. However, in one instance, a Velcro closure was used, the position of which may interfere with the IM, in which case it would need to be removed or relocated.		
Estimated impact of warning placements on manufacturers (materials &/or production processes)	In most cases, it is likely that the flap will need to be extended to accommodate a CHW that covers 65% of the opening side. In the samples seen, surfaces used for GW & IM are already printed, so materials & print process should not be significantly affected.		

4.1.3. Comparison of visibility between 2 options

Option 1



Option 2



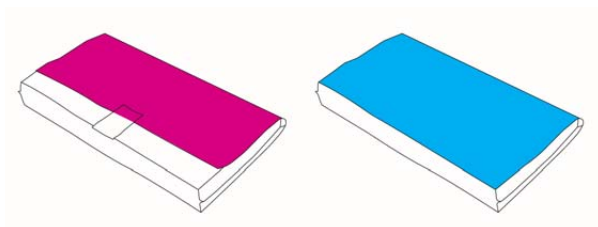
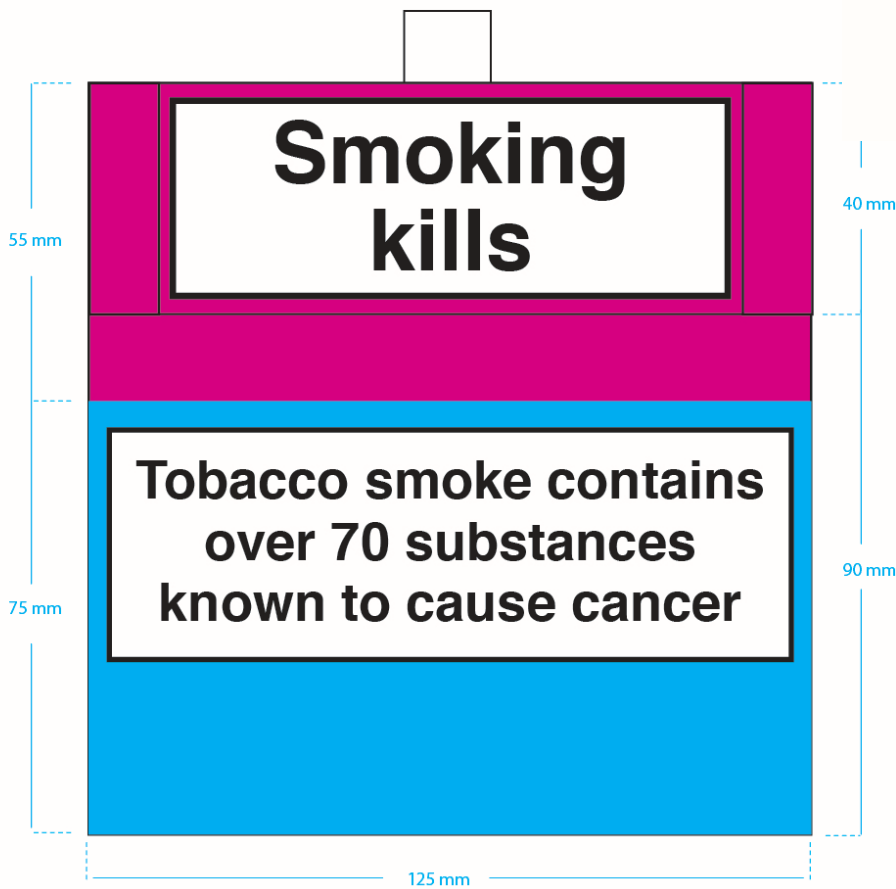
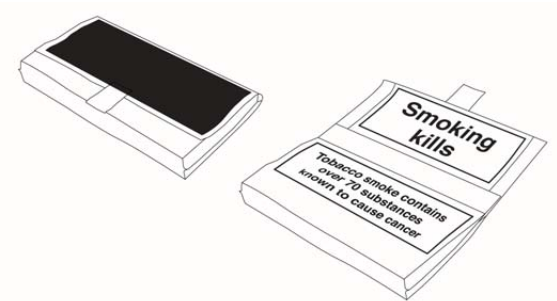
Comparison of proposals: Wrap-around pouch with flap		
	Option 1	Option 2
Advantages & disadvantages of each option	<p>Advantages: Both GW and IM visible when pouch fully open</p> <p>Disadvantages: Production implications of printing on inside of flap; smaller GW</p>	<p>Advantages: Inside flap not printed, so less implications on production</p> <p>Disadvantages: GW & IM not visible at the same time. Information message not visible when pouch in use</p>
Size comparison of warnings across each option	<p>GW: 4,185 mm²</p> <p>IM: 5,062.5 mm²</p>	<p>GW: 5,062.5 mm²</p> <p>IM: 5,062.5 mm²</p>
Does one proposal offer far stronger stand-out compared to the others?	Warnings are of similar size in each proposal, however Option 1 gives better visibility, since both warnings can be seen when the pouch is open.	

4.2. Position of GW & IM on flat bottomed pouches with flap

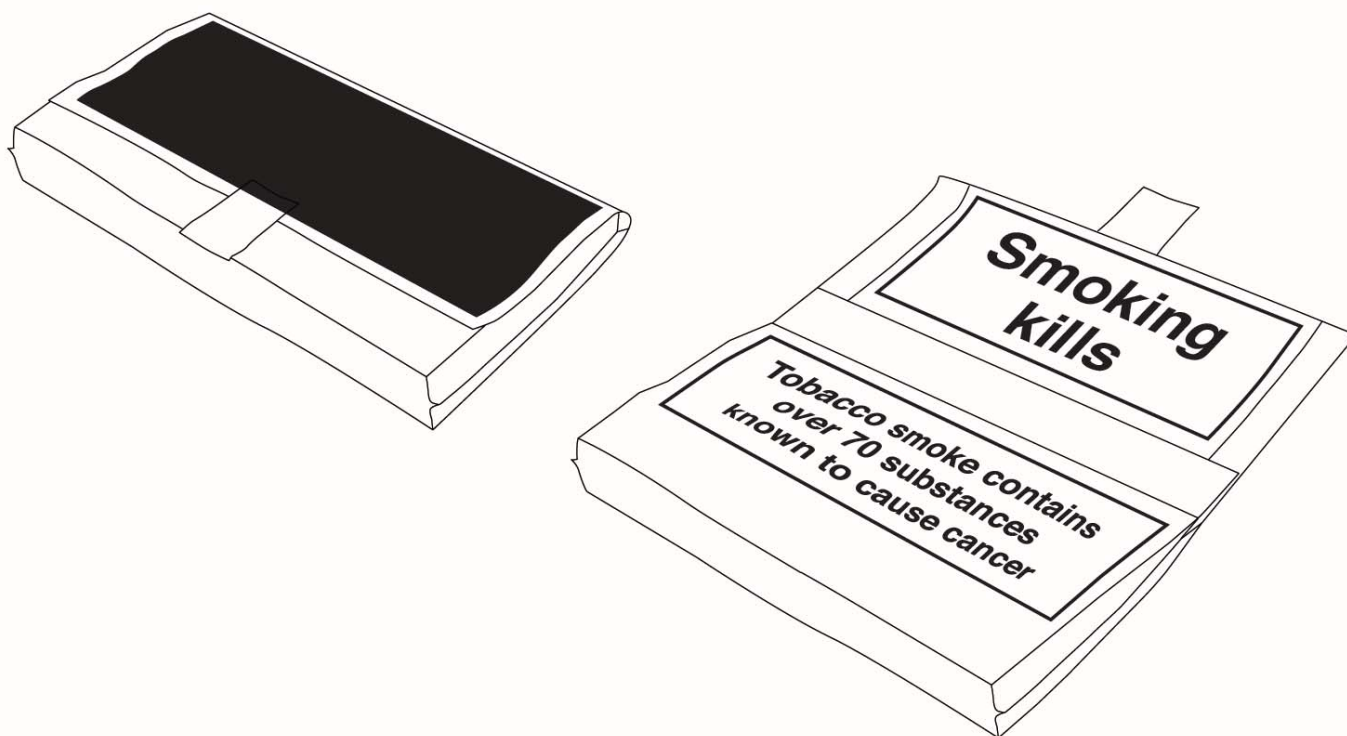
Calculations for the proportion of warnings have been based on one of the most common pack sizes identified for flat bottomed pouches – 125mm (W) x 75mm (H) (when closed).

4.2.1. Flat bottomed pouch with flap: Option 1

Option 1 utilises the inside of the flap to carry the IM, with the GW on the pocket that is visible once the flap is lifted.



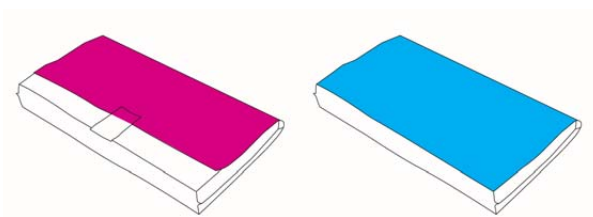
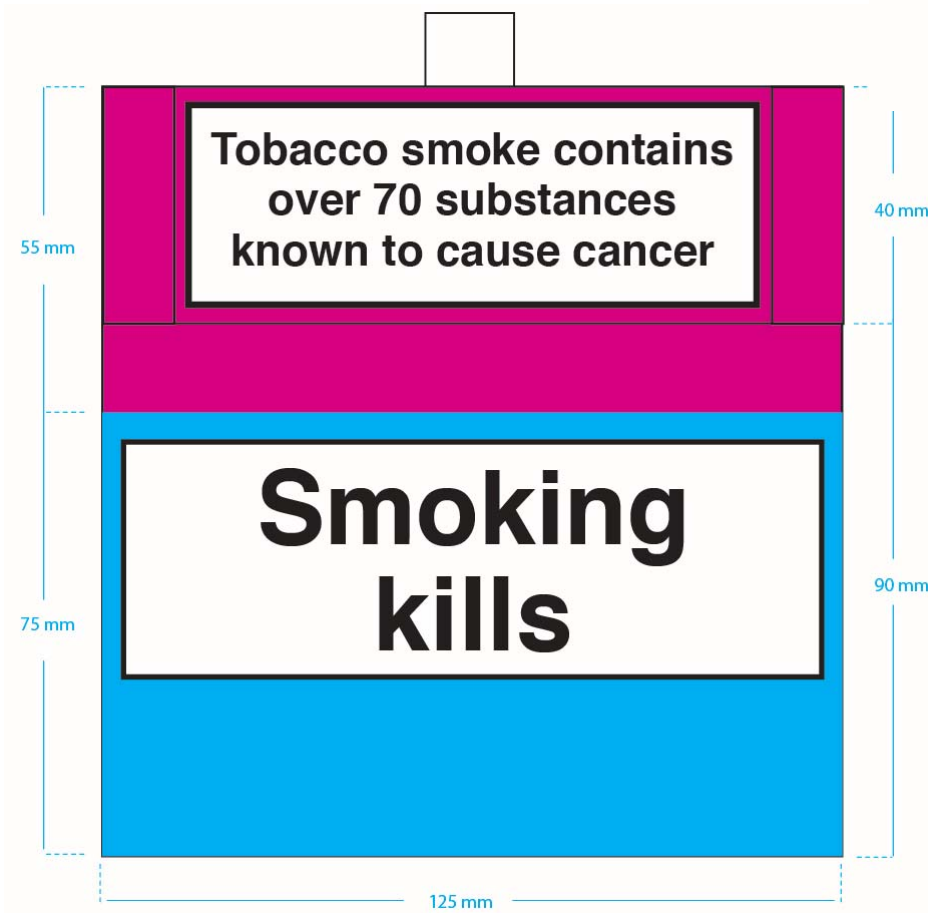
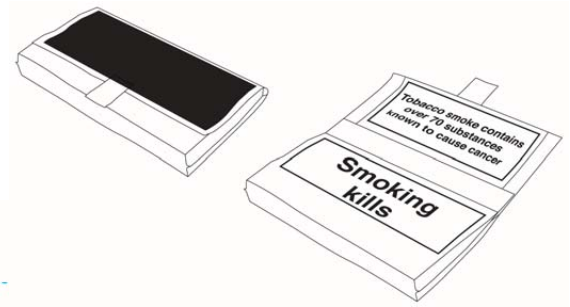
- Surface calculated:** Flap area when pouch closed
Position of warning: Inside of flap when pouch open
- Surface calculated:** Pocket area when pouch closed
Position of warning: Pocket area when pouch open



Flat bottomed pouch with flap: Option 1			
Percentage of pack surface covered by warning	CHW: 65% of front and 65% of back surfaces	GW: 50% of flap area (calculated when pouch closed)	IM: 50% of pocket area (calculated when pouch closed)
Evaluation/assessment of warning visibility	Closed: CHW visible, from both front & back	In use: CHW no longer visible; GW & IM both visible	
How position of warnings influence each other	Position of CHW on outer surfaces means that GW & IM only visible once pack open. IM is the larger warning, however GW positioned at top so reads first.		
Does the opening mechanism of the pouch affect the visibility of any/all of the warnings?	The flap is generally sealed with a transparent self-adhesive tab.		
Estimated impact of warning placements on manufacturers (materials &/or production processes)	It should be possible to reverse print paper-insert pouches, however this may have some impact on production processes and materials used. Whereas in most cases the flap should be large enough to carry a 65% CHW, the flap may need to be extended to allow for positioning of Tax Stamps etc.		

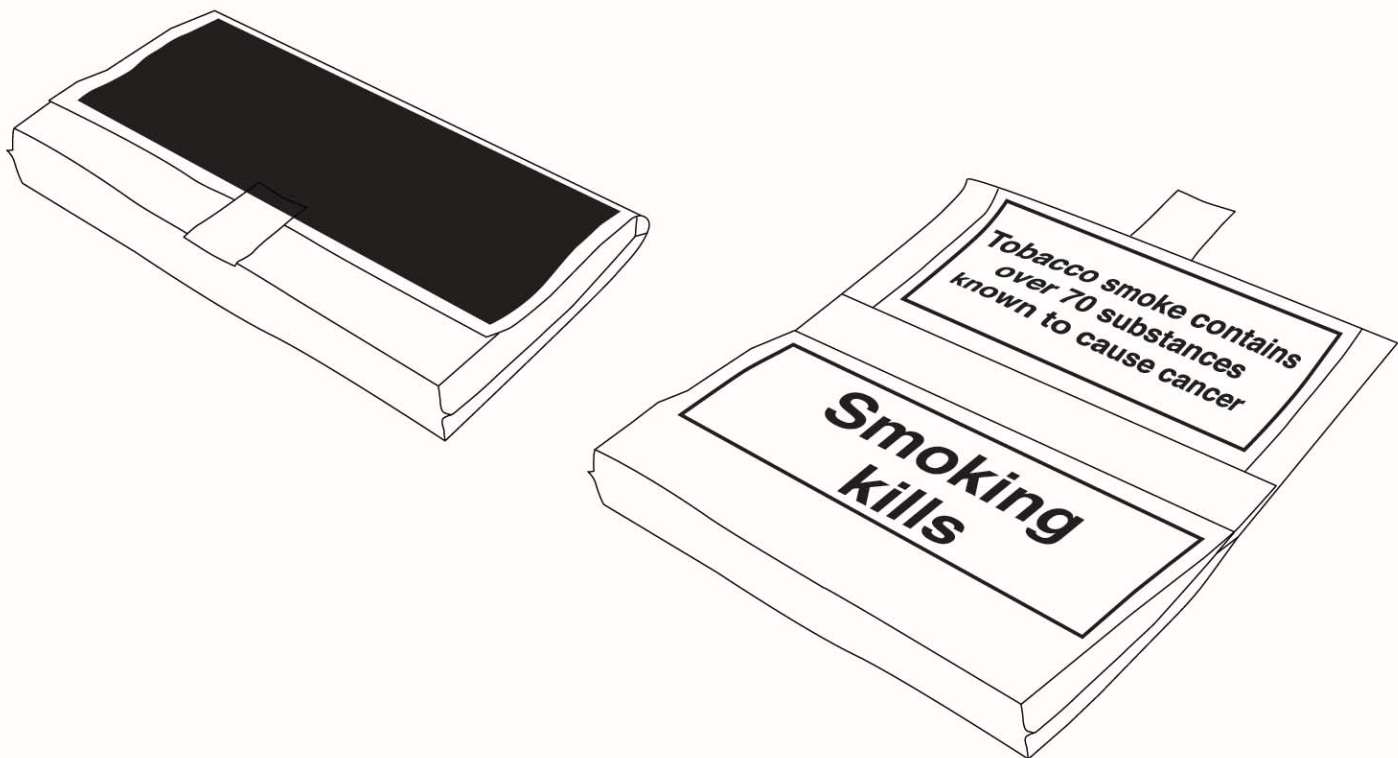
4.2.2. Flat bottomed pouch with flap: Option 2

This option is similar to Option 1, however the position of the GW and IM has been swapped.



- Surface calculated:** Flap area when pouch closed
Position of warning: Inside of flap when pouch open

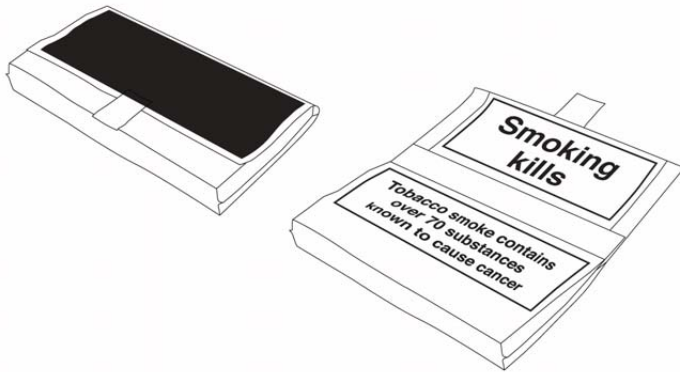
- Surface calculated:** Pocket area when pouch closed
Position of warning: Pocket area when pouch open



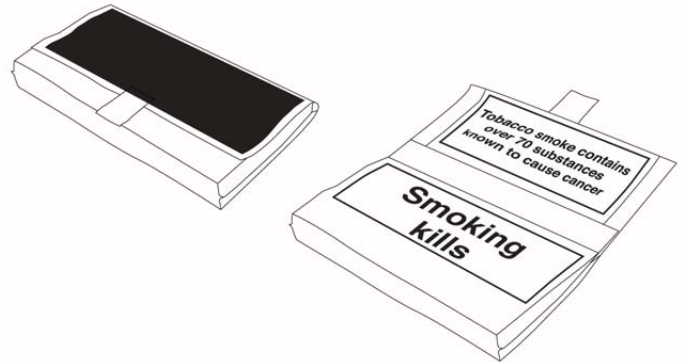
Flat bottomed pouch with flap: Option 2			
Percentage of pack surface covered by warning	CHW: 65% of front and 65% of back surfaces	GW: 50% of pocket area (calculated when pouch closed)	IM: 50% of flap area (calculated when pouch closed)
Evaluation/assessment of warning visibility	Closed: CHW visible, from both front & back	In use: CHW no longer visible; GW & IM both visible	
How position of warnings influence each other	Position of CHW on outer surfaces means that GW & IM only visible once pack open. GW is the larger warning, however the IM may be prioritised since it's positioned at the top.		
Does the opening mechanism of the pouch affect the visibility of any/all of the warnings?	The flap is generally sealed with a transparent self-adhesive tab. Since these are transparent, they should not affect the visibility of the CHW. However, in some cases, the barcode is printed on the tab, which would therefore need to be removed so as not to affect the CHW.		
Estimated impact of warning placements on manufacturers (materials &/or production processes)	It should be possible to reverse print paper-insert pouches, however this may have some impact on production processes and materials used. Whereas in most cases the flap should be large enough to carry a 65% CHW, the flap may need to be extended to allow for positioning of Tax Stamps etc.		

4.2.3. Comparison of visibility between 2 options

Option 1



Option 2



Comparison of proposals: Flat bottomed pouch with flap		
	Option 1	Option 2
Advantages & disadvantages of each option	<p>Advantages: GW & IM both visible when pack open</p> <p>Disadvantages: some impact likely on production process &/or material</p>	<p>Advantages: GW & IM both visible when pack open</p> <p>Disadvantages: some impact likely on production process &/or material</p>
Size comparison of warnings across each option	<p>GW: 3,437.5 mm²</p> <p>IM: 4,687.5 mm²</p>	<p>GW: 4,687.5 mm²</p> <p>IM: 3,437.5 mm²</p>
Does one proposal offer far stronger stand-out compared to the others?	<p>Option 2 gives the largest GW, however the IM may be more visible, since it's above the GW and would be read first. Option 1 gives a better balance of both messages and prioritises the GW to read first.</p>	

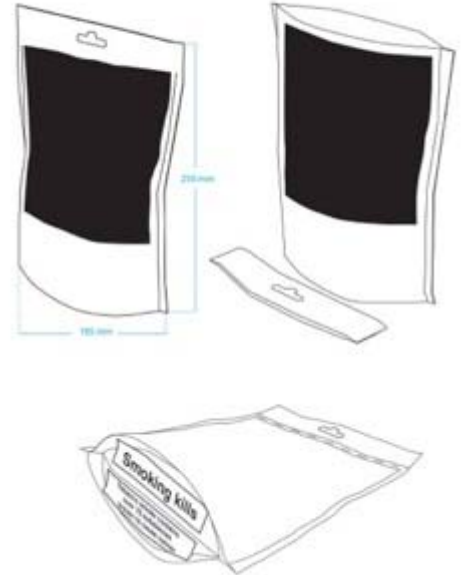
4.3. Position of GW & IM on standing pouches

Calculations for the proportion of warnings have been based on one of the mid-sized packs identified for RYO tobacco in standing pouches – 250mm (H) x 185mm (W).

4.3.1. Standing pouch: Option 1a

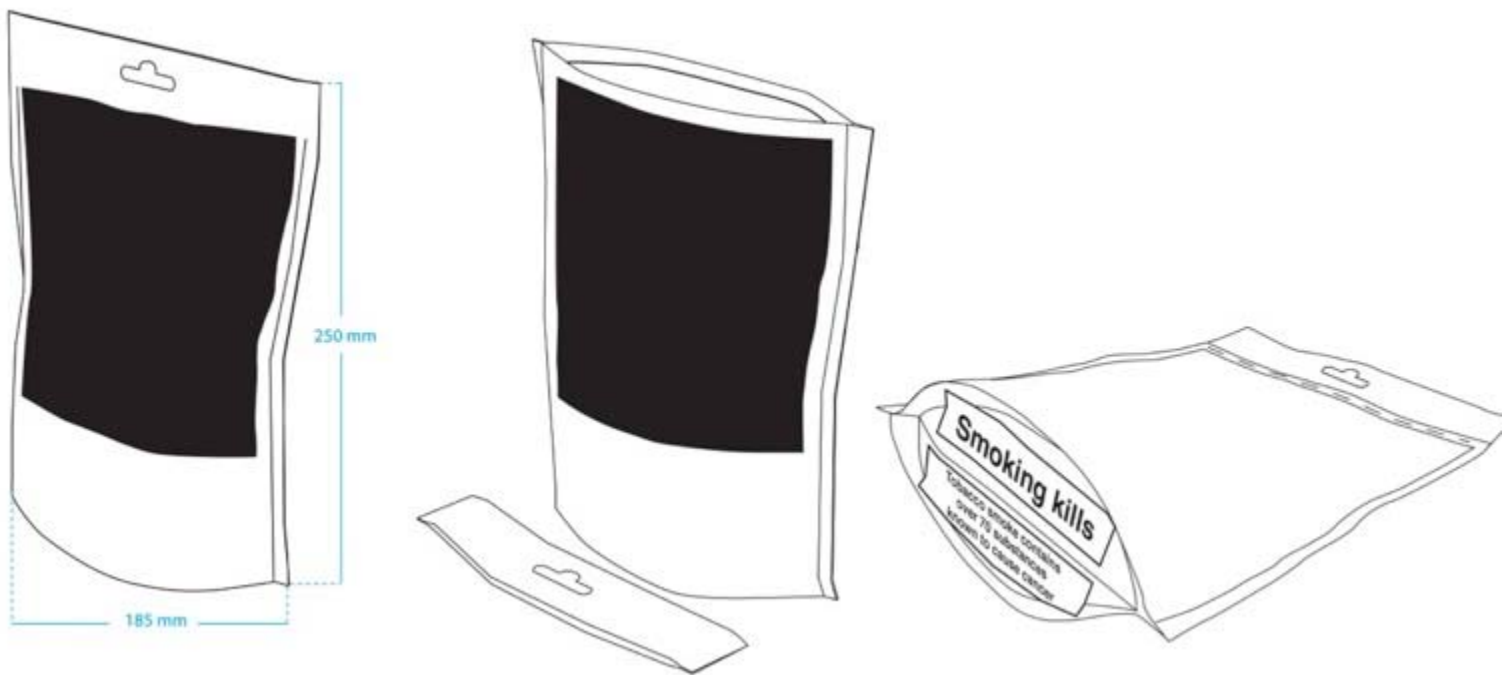
Option 1a utilises the base of the standing pouch. This area includes two surfaces, either side of the central crease line on the base, with the GW and IM centred on each side.

The surface calculated excluded the side areas sealed to form standing base.



- Surface calculated:** Base of pouch, up to the central crease when flattened
Position of warning: Base of pouch, up to the central crease when flattened, not including the strips to each side which are sealed when pack is formed

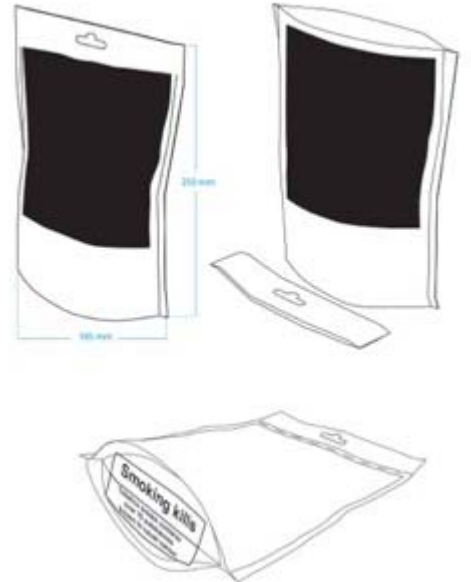
- Surface calculated:** Base of pouch, up to the central crease when flattened
Position of warning: Base of pouch, up to the central crease when flattened, not including the strips to each side which are sealed when pack is formed



Standing pouch: Option 1a			
Percentage of pack surface covered by warning	CHW: 65% of front and 65% of back surfaces (excluding top strip)	GW: 50% of the visible upper half of the base	IM: 50% of the visible lower half of the base
Evaluation/assessment of warning visibility	Closed: CHW visible, from both front & back; GW/IM visible when pack tilted, but may be partly covered by folds in plastic		In use: CHW still visible; GW & IM no longer visible, unless pack tilted, but may be partly covered by folds in plastic
How position of warnings influence each other	Lack of surfaces and stipulation for CHW to appear on 65% of both front and back, leave few options for placement of GW and IM		
Does the opening mechanism of the pouch affect the visibility of any/all of the warnings?	CHW needs to be positioned below the zip lock, since the top strip is cut/torn and discarded on first use.		
Estimated impact of warning placements on manufacturers (materials &/or production processes)	Some samples seen are already printed on the base of pack, and warnings are printed on the base of pack in other jurisdictions, so there should be little impact on production process &/or material.		

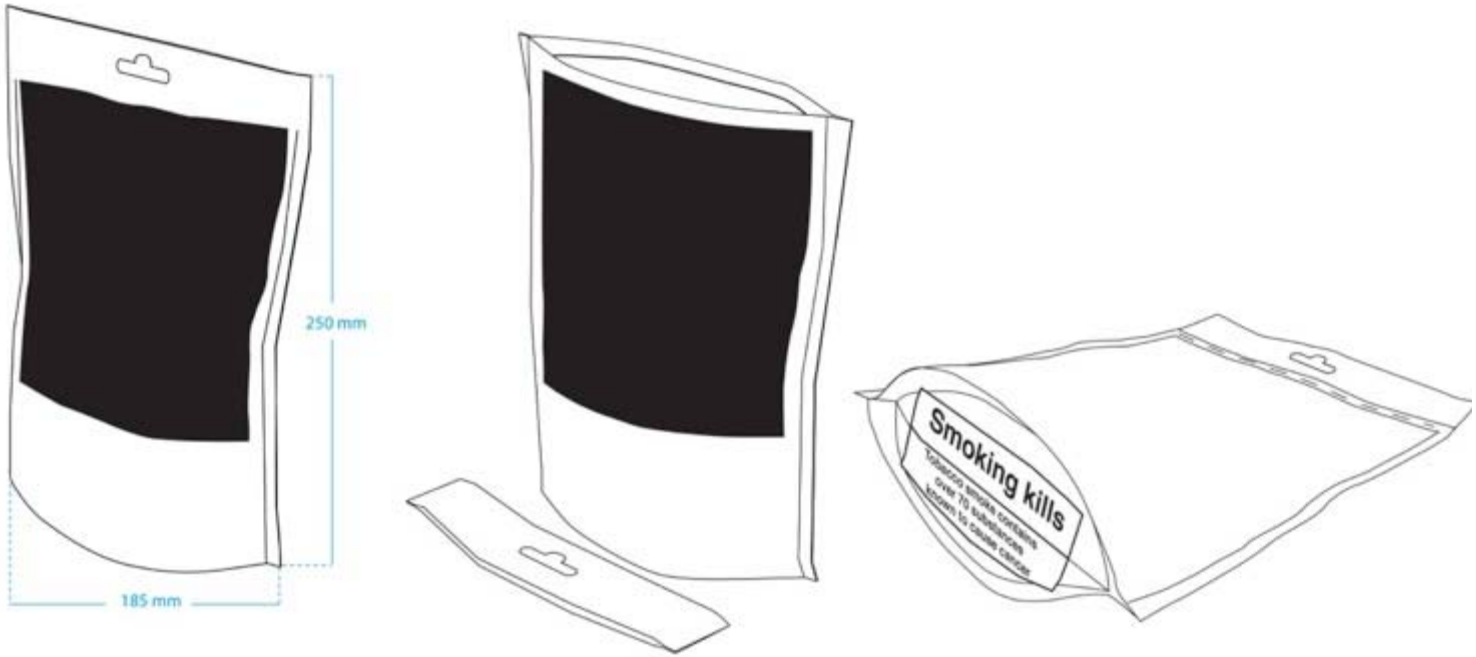
4.3.2. Standing pouch: Option 1b

Option 1b is similar to Option 1a, however the GW and IM are 'butted' against each other, so they are more centred on the base of pack and, therefore, slightly easier to see.



- Surface calculated:** Base of pouch, up to the central crease when flattened
Position of warning: Base of pouch, up to the central crease when flattened, not including the strips to each side which are sealed when pack is formed

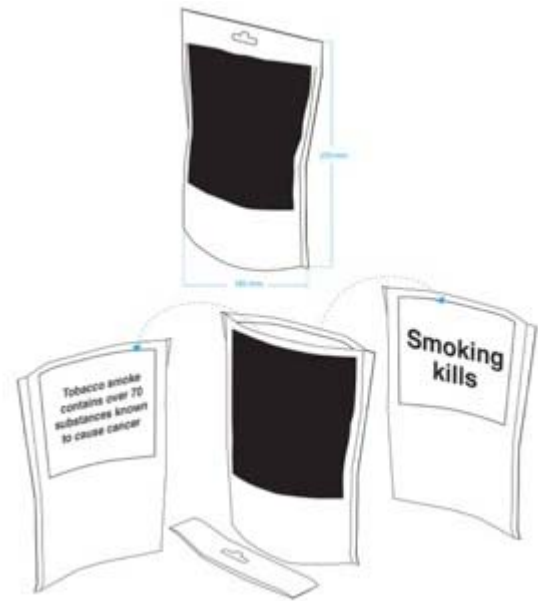
- Surface calculated:** Base of pouch, up to the central crease when flattened
Position of warning: Base of pouch, up to the central crease when flattened, not including the strips to each side which are sealed when pack is formed



Standing pouch: Option 1b			
Percentage of pack surface covered by warning	CHW: 65% of front and 65% of back surfaces (excluding top strip)	GW: 50% of the visible upper half of the base	IM: 50% of the visible lower half of the base
Evaluation/assessment of warning visibility	Closed: CHW visible, from both front & back; GW/IM visible when pack tilted		In use: CHW still visible; GW & IM no longer visible, unless pack tilted
How position of warnings influence each other	Lack of surfaces and stipulation for CHW to appear on 65% of both front and back, leave few options for placement of GW and IM		
Does the opening mechanism of the pouch affect the visibility of any/all of the warnings?	CHW needs to be positioned below the zip lock, since the top strip is cut/torn and discarded on first use.		
Estimated impact of warning placements on manufacturers (materials &/or production processes)	Some samples seen are already printed on the base of pack, and warnings are printed on the base of pack in other jurisdictions, so there should be little impact on production process &/or material.		

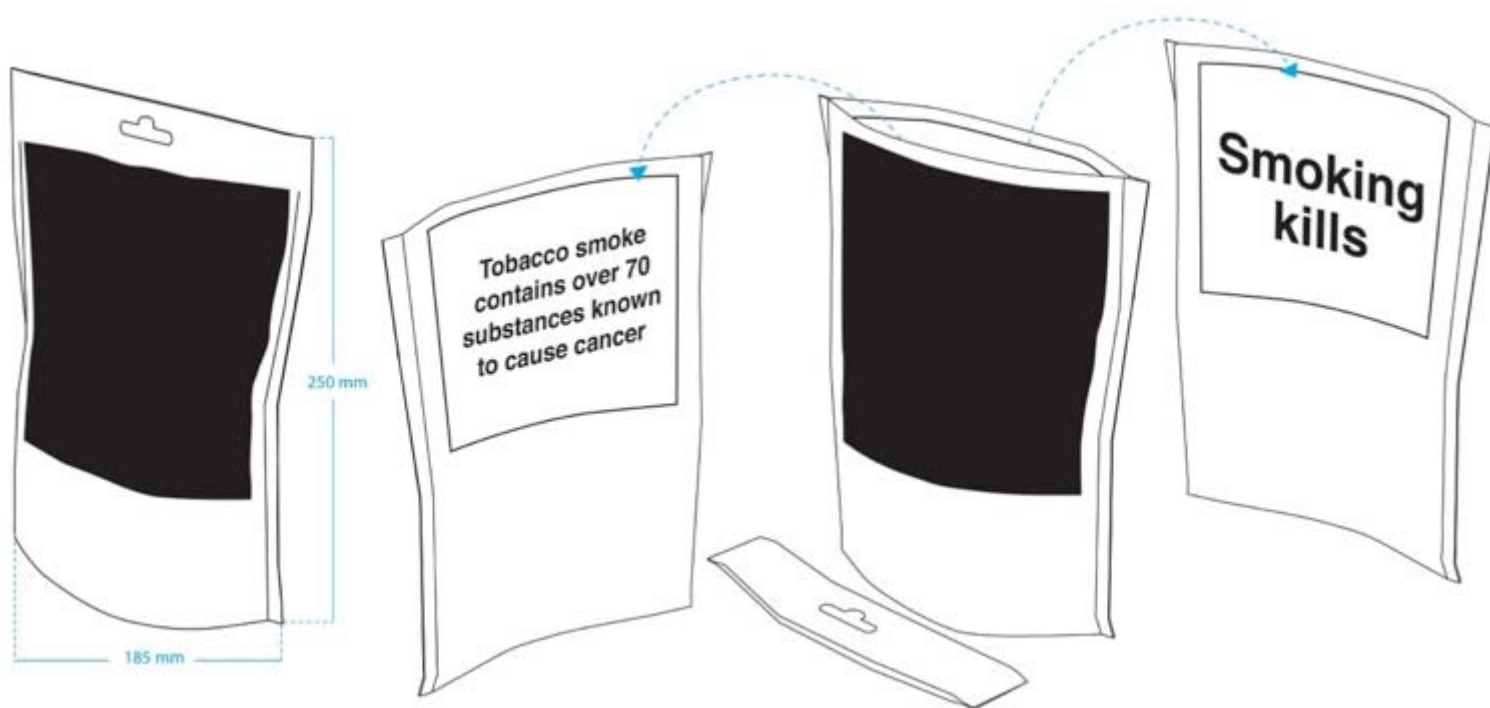
4.3.3. Standing pouch: Option 2

Option 2 utilises the inside surfaces of the pack, rather than using the base of pack. The inside back surface of the pouch is used for the GW and inside front surface for the IM.



- Surface calculated:** Back of pouch, when tear strip has been removed and pouch closed
Position of warning: Inside back surface of pouch

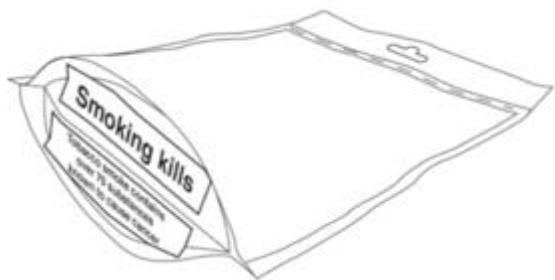
- Surface calculated:** Back of pouch, when tear strip has been removed and pouch closed
Position of warning: Inside front surface of pouch



Standing pouch: Option 2			
Percentage of pack surface covered by warning	CHW: 65% of front and 65% of back surfaces (excluding top strip)	GW: 50% of the inside back surface	IM: 50% of the inside front surface
Evaluation/assessment of warning visibility	Closed: CHW visible, from both front & back		In use: CHW still visible; GW &/or IM visible depending on fill line of tobacco and orientation of pack
How position of warnings influence each other	Lack of surfaces and stipulation for CHW to appear on 65% of both front and back, leave few options for placement of GW and IM		
Does the opening mechanism of the pouch affect the visibility of any/all of the warnings?	CHW, GW and IM need to be positioned below the zip lock, since the top strip is cut/torn and discarded on first use.		
Estimated impact of warning placements on manufacturers (materials &/or production processes)	No pack samples seen currently print on the inside. From our understanding, standing pouches currently produced using 2-layer laminate, will need to become 3-layer laminate, in order to print on the inside surface and avoid ink migration issues and 'show through' (see Section 3.3), which may have cost, environmental and waste implications.		

4.3.4. Comparison of visibility between 3 options

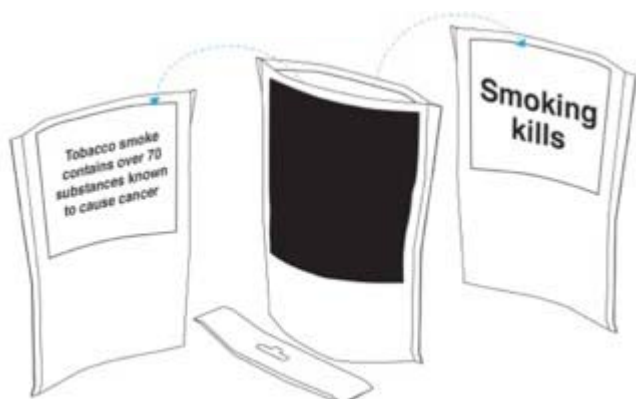
Option 1a



Option 1b



Option 2



Comparison of proposals: Standing pouch			
	Option 1a	Option 1b	Option 2
Advantages & disadvantages of each option	<p>Advantages: All warnings are visible from outside</p> <p>Disadvantages: Small GW &IM; could be missed on base. Warnings may be partly covered by folds in plastic</p>	<p>Advantages: All warnings are visible from outside</p> <p>Disadvantages: Small GW &IM; could be missed on base</p>	<p>Advantages: Large GW & IM</p> <p>Disadvantages: Tobacco fill-line could obscure GW & IM; visibility of GW/IM dependent on pack orientation and how much tobacco is in the pack; Production implications of printing on inside of pouch</p>
Size comparison of warnings across each option	<p>GW: 4,207.5 mm²</p> <p>IM: 4,207.5 mm²</p>	<p>GW: 4,207.5 mm²</p> <p>IM: 4,207.5 mm²</p>	<p>GW: 20,812.5 mm²</p> <p>IM: 20,812.5 mm²</p>
Does one proposal offer far stronger stand-out compared to the others?	<p>Option 2 provides larger warnings, but could be overlooked or obscured by pouch content. The 'butted up' GW/IM on Option 1b provides warnings that are slightly more visible than Option 1a and are in alignment with the position of warnings on standing pouches in other jurisdictions</p>		

5. Mock-ups

For the purposes of the Interim Meeting on 10 February 2015, physical pouch samples were mocked-up with warnings affixed in the position of each of the proposals presented. It was agreed with the Commission that the same type of mock-ups would be suitable for use at the Expert Meeting on 13 March 2015.

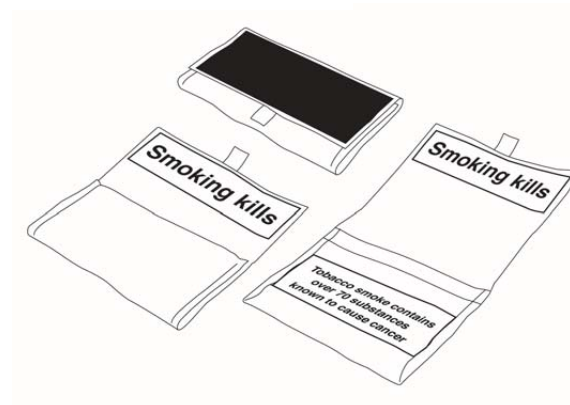
6. Conclusions

6.1. Preferred proposals

Wrap-around pouches with flap

- Option 1 ensures the full visibility of the General Warning and Information Message when the wrap-around pouch is open and in use, which is the most important consideration. Since tobacco is often portioned on the inside of the flap, this option allows for both messages to be fully visible at the same time, with the GW also being fully visible as the pouch is being opened/un-rolled.
- However, for Option 1 applied to film/laminate pouches, the requirement for 3-layer laminate production may have a cost, environmental and waste impact.
- We do not envisage any significant impact of implementing Option 1 to paper-insert pouches, though some changes in production process and/or materials are likely.
- From our understanding and samples seen, the flap will need to be extended on all wrap-around pouches.

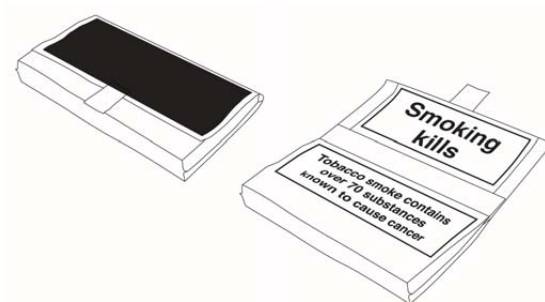
Wrap-around pouch – preferred option (1)



Flat bottomed pouches with flap

- Option 1 provides a solution that ensures the full visibility of the General Warning and Information Message when the pouch is open and in use. It also provides a consistent solution for RYO tobacco in pouches with flaps, with the GW and IM positioned in the same places as that shown in Option 1 (the preferred option) for wrap-around pouches.
- Since all flat bottomed pouches are paper-insert, there is no known concern with ink migration and

Flat bottomed pouch – preferred option (1)

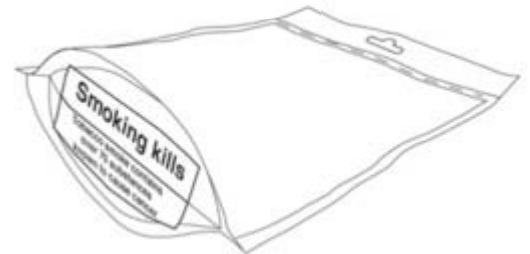


printing on the inside of the flap should be feasible, though some changes in production process and/or materials are likely.

Standing pouches

- Whereas Option 2 provides a larger General Warning and Information Message, the visibility of the warnings inside the pack is reduced.
- Option 1 offers a more obvious solution, with all warnings visible from the outside. Option 1b, with the General Warning and Information Message 'butted up', means that the warnings are slightly more visible than Option 1a.

Standing pouch – preferred option (1b)



Annex 3

D4 report:

Technical specifications for combined health warnings

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1. Introduction

This document is deliverable D4 for the above contract 2014 71 02 concerning technical specifications for combined health warnings on tobacco packages.

The aim of the project is to provide the European Commission with proposals and technical specifications on the implementation of warning messages on tobacco packages, according to the provisions of the Tobacco Products Directive¹ (TPD), including the requirements set out in Chapter II 'Labelling and Packaging'. The purpose is to develop proposals that clearly specify the size, shape and position of the warnings on smoked tobacco product packaging that will be used and respected by manufacturers and/or importers of these products throughout Europe.

It should therefore be noted that the work in this report consists of proposals to the European Commission.

This document presents the proposals for work package 3 (technical specifications for combined health warnings).

The document is structured as follows:

- Section 2 presents the methodology undertaken to provide the design proposals for combined health warnings under work package 3;
- Section 3 presents an overview of the 25 most common or representative packs identified for smoked tobacco, production processes and points to consider following the audit of physical packs in WP1 and consultation with stakeholders;
- Section 4 gives the preliminary audit of packs from Australia, Canada and Brazil;
- Sections 5, 6 and 7 present the proposals for the placement of combined health warnings, the different design concepts presented and the agreed final design, illustrated across the 25 packs; and
- Section 8 provides recommendations on how to ensure consistency of warning quality and reproduction across different pack types and substrates.

2. Methodology

This section presents the methodology for work package 3 of the above contract.

This work package looked at the design detailing for each type of combined health warning (CHW) and the creation of agreed specifications within TPD legislation, to which all manufacturers will have to adhere.

This included design consideration for the different aspects of the warning message elements – 'look & feel' (colour, type styles etc), positioning and shape of the messages, balance of text versus image, language requirements and placement of smoking cessation information.

All options took into account the 25 different pack types identified in WP1, details of Tax Stamps and cessation information provided in the public authority consultation, as well as the warning placements for RYO pouches established in WP2. Feedback from stakeholder

¹ http://ec.europa.eu/health/tobacco/docs/dir_201440_en.pdf

questionnaires and face-to-face interviews regarding different substrates and production processes was also taken into consideration.

At the same time, an audit was carried by the University of Stirling team along with two of their international experts, Professor Dave Hammond and Melanie Wakefield on smoked tobacco product warnings on packs from three other jurisdictions – Australia, Canada and Brazil. The audit looked at the distribution of text versus picture, colour of text and similar features.

Once Butcher & Gundersen had a full understanding of the TPD, different common and representative pack types, print and production restrictions and the design of warnings from other jurisdictions, they then looked at proposals for the placement of the combined health warning across the 25 pack types and created different design concepts/solutions for the design 'look & feel'. Feedback from the preliminary positionings of the combined health warning, shared with the Commission at the Experts Meeting on 13 March, was also incorporated.

Initially, the team established the size and position of each warning across the 25 different pack types identified in WP1, allowing for the position of a Tax Stamp (where required), following the three year exemption period. A core set of 6 shapes was then identified – 4 shapes from which the warnings could be easily implemented across most of the 25 packs, without the need for too much redesign, plus an additional 2 shapes that allowed for cigar tubes and round pipe tins.

The design team then started to explore the 'look & feel' of the new combined health warnings. Design concepts were created, initially shown across one pack shape, using the longest warning message (in English) – “Your smoke harms your children, family and friends” – in both one language (English) and three language (Belgium) versions. Preferred options were then also illustrated across the remaining 5 shapes.

Each concept considered:

- the balance of image versus message and cessation information
- how the images are cropped (considering IP etc)
- stand out of message against the image
- incorporation of cessation information
- size and shape of messaging
- colour and size of typeface
- single versus multiple languages and length of translations
- opening and closing mechanisms
- placement of Tax Stamps
- parts of packaging that is only used for display.

They also looked specifically at how the combined health warning will work on flip-top cigarette packs, where the warning is split when the pack is opened.

Following a review with the wider consortium team as well as our international experts, David Hammond and Melanie Wakefield, the initial design concepts were shared with DG SANTE by web conference for their feedback. One preferred concept was then selected and the agreed design was implemented across all 25 packs identified at WP1 (using one combined health warning message for illustration purposes). Each shape was visualised as a 2D flat visual and then applied to the 3D visual graphical representations created in WP1 for a more realistic representation, so that the impact of the position, shape, size and design/style of the warning

messages can be fully appreciated and the shape/size of each different pack type fully understood.

Input from stakeholder questionnaires and face to face meetings (held throughout WP1) was taken into account when proposing both size and position of the combined health warning, as well as the design 'look & feel', particularly when assessing the feasibility (and impact) of the proposals from a manufacturers' point of view. Additional questions were asked of the industry where technical clarification was required and a further meeting was arranged in April with a European manufacturer of tinned tobacco, to ensure a good understanding of the print and production constraints of this substrate.

A workshop with tobacco companies and manufacturers was held in Brussels on 27 April 2015, to present the findings of WP2 and WP3 to the industry and gather their feedback, primarily on the technical specifications for combined health warning, prior to the completion of the editing document in WP4.

Please note: Whereas Butcher & Gundersen have a broad experience of packaging types, print methods and substrates, they are not experts in the field of print and production of tobacco packaging. Therefore, all proposals and guidance given in this document are based on feedback from questionnaires and face-to-face interviews with industry experts and national regulators, as well as physical examination of pack samples supplied.

3. An overview of the 25 most common or representative packs for the different categories of smoked tobacco

Following the audit in WP1, including the assessment of completed questionnaires from 40 industry stakeholders, face to face meetings with representatives of 10 tobacco manufacturers/producers (with an 11th arranged during WP3) and the examination of over 735 pack samples, 25 packs were identified as the most common or representative for the different categories of smoked tobacco – 8x Cigarette; 5x RYO; 2x Waterpipe and 10x ‘Other’ (Cigar, Cigarillo, Pipe tobacco).

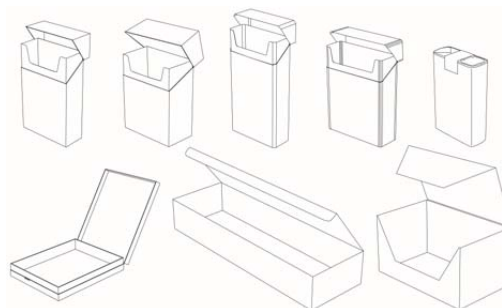
Each pack was then considered in detail, with an analysis made on opening/closing mechanisms, substrates and print/production methods, to gain a better understanding on how the implementation of the new technical specifications might impact the industry. This also took into account the positioning of Tax Stamps (following the initial three year exemption period), where applicable.

Stakeholder feedback was obtained in order to establish the general principles for the print and production of tobacco packaging. In this context, the industry also reported general concerns (not necessarily in the scope of this contract) about the investment that would be needed for the implementation of TPD II, as well as their widespread concerns regarding the time remaining prior to the deadline of 20 May 2016.

3.1. Cigarettes

Eight key packs were identified (both unit packs and outer/display packaging), that will be allowable for Cigarettes in TPD II:

1. Standard flip-top box
2. Wide flip-top box
3. Bevel corner flip-top box
4. Rounded corner flip-top box
5. Soft pack
6. Shoulder-hinged box
7. Outer packaging (for flip-top boxes)
8. Outer packaging (for shoulder hinged boxes)

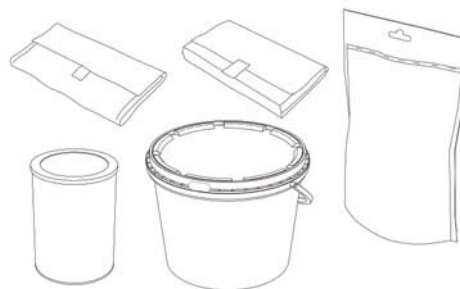


Additional pack types were identified (e.g. extra tall flip-top box), but it was felt that these 8 packs were the most common and provided a good representation of the range of different formats/shapes/opening mechanisms across which the technical specifications would need to be implemented. Layouts given for these packs should then be straightforward to extrapolate to other pack formats, as required.

3.2. Roll-your-own (RYO)

There are 5 different common pack types used for RYO tobacco, that will be allowable under TPD II:

1. Wrap-around pouch with flap
2. Flat bottomed pouch with flap
3. Standing pouch
4. Cylinder
5. Cylindrical bucket.



Other pack types were identified for RYO tobacco (e.g. cuboid cans, cuboid buckets, block packs), but it was felt that this selection provided the most common types within the sector, without duplicating pack formats that were covered within the pack types selected for Cigarettes, Waterpipe, Cigar, Cigarillo or Pipe tobacco. Layouts given for these packs should then be straightforward to extrapolate to other pack formats, as required.

RYO – production processes and substrates

Pouches

It was highlighted during the audit in WP1 that some RYO tobacco pouches are printed using flexography and the question was raised as to whether it would be possible to achieve good enough quality when printing the combined health warnings using this method.

The existing TPD specifies a minimum print requirement of 133 lines per inch, however consultation with the stakeholders indicated that this was generally not achievable for most standing pouches which are printed in flexography (though those printed using the finer quality gravure process would not cause a problem) and for some types of wrap-around pouch – paper laminate wrap-around pouches are currently printed at around 32-36 lines/cm (81-91 lines/inch), whilst 1-layer/monofilm ‘poly pouch’ wrap-around pouches are generally printed at around 42-48 lines/cm (106-121 lines/inch).

In many cases the stretchiness of the substrate also meant that achieving a good print quality would be a challenge, though it was pointed out that some Member States already print picture warnings on such pouches, and the quality of these had been considered acceptable by those countries.

However, it was also highlighted by the industry that other factors (such as resolution) effect print quality and that the minimum lines per inch in flexography depended on many parameters, such as design, colours used, ink type, flexo plate and anilox rollers.

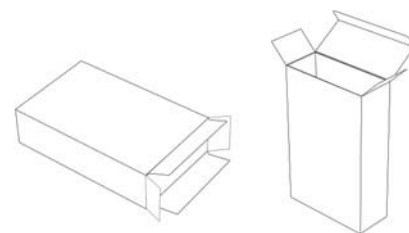
Cylinders

Whereas the combined health warnings must be printed on the curved surfaces of cylinder packs, concerns were raised regarding the printing of other warnings on the inside of cylinder lids, where ink could transfer to the tobacco and the fact that stickers are not always straightforward and require special machinery to apply them.

3.3. Waterpipe

Most Waterpipe tobacco is available in the same type of pack formats used for RYO tobacco or Cigarettes (e.g. cylindrical bucket, flip-top box, pouch with flap). However 2 pack types were identified as being more commonly found for Waterpipe tobacco:

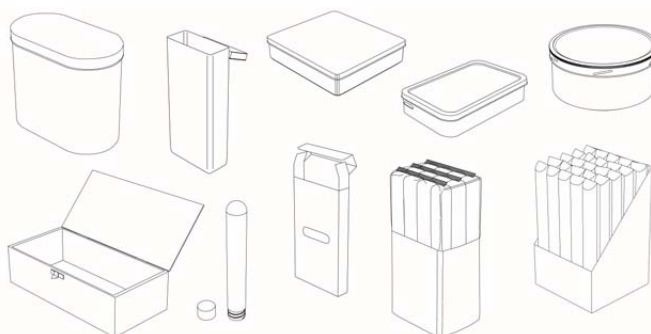
1. Tuck-top box (portrait)
2. Carton box (landscape).



3.4. Other – cigars, cigarillos and pipe tobacco

The 'other' sector presented the widest array of pack shapes and formats, since the product range is so broad. We therefore identified the 10 packs that were most commonly found, and/or presented the biggest foreseen challenges when it came to implementing Article 10, in the event that a Member State required combined health warnings for these tobacco types:

1. Cylindrical tin
2. Hinged tin (upright)
3. Hinged tin (square)
4. Rectangular tin
5. Round tin
6. Hinged box
7. Cigar tube
8. Shell & slide box
9. Cigar bundle
10. Multi-pack display (cigars).



Numerous other pack types were identified in this area (e.g. shoulder hinged box, soft pack, standing pouch, slide-lid box), but it was felt that this selection were the most representative within the sector, without duplicating pack formats that were covered within the pack types selected for Cigarettes, Waterpipe or RYO. Layouts given for these packs should then be straightforward to extrapolate to other pack formats, as required.

Cigars, cigarillos and pipe tobacco – production processes and substrates

Whereas TPD II allows for an exemption from combined health warnings for 'other' products though Article 11, Member States may require the full regime and the implementation of Articles 9 and 10. Because of the broad range of pack types, shapes, sizes and materials (wood, carton, tin, plastic etc) available, and small batch production of many of these products, the industry has highlighted the significant impact this may have on cigar, cigarillo and pipe tobacco industry.

They also reported that investment would need to be made for the general implementation of TPD II (not necessarily in the scope of this contract), as well as their concerns regarding the

limited time remaining, particularly due to the long lead times (according to the industry 12-18 months in many cases) required for the updating/replacement of machinery and production processes etc.

Other points specific to the implementation of TPD II were also raised, which are detailed below.

Small volume production

Because of the low volumes (but large selection) of products, much of the cigar industry is batch production, rather than flow production which is generally used for cigarettes. This means that whilst a lot of the packaging is universally printed/branded in bulk – and in many cases, the packs pre-filled – small batches of packs are only then made country/language-specific through stickering, once an order has been placed.

Articles 9 and 10 versus Article 11

In face-to-face interviews, the industry highlighted the complexities and significantly higher cost and time implications in this sector of implementing Articles 9 and 10, particularly if they are required to position warnings on the inside of lids and/or the lateral sides of shallow packs (though this is less of an issue for combined health warning, Article 10). This is largely due to the production methods and smaller volumes in the cigar industry.

The industry also pointed out the additional investment required in this sector (which only accounts for around 1% of tobacco products in Europe) compared to the cigarette, RYO and waterpipe tobacco sectors, since Member States could choose to implement either the Article 9/10, or Article 11 regimes for these products, preparations had to be made for both scenarios.

Large boxes

For particularly large pack formats specific to this sector, such as wooden cigar assortment boxes (which can be up to 340mm x 500mm x 48mm in size), the industry raised concerns regarding the application of stickers for the combined health warning under Article 10. Because these would need to be 65% of the front surface (a warning of around 330mm x 335mm, which is larger than an A4 page), ‘bubbling’ can often occur when applying stickers of this size.

Small tins

Coated tin plate printing is a complex, multi-step process that requires a high level of investment and, whereas it is generally possible to print tins in 4-colour, because of minimum print quantities (around 50,000), in many cases it would be impractical to pre-print country/language-specific detail as order quantities would not justify the additional cost required.

Tin lids and bases are generally planned-up in parallel strips on one sheet of tin, with more lids planned-up than bases, since the lids are shallower and use less tin when formed, compared to the deeper bases. However, with the requirement for the printing of matching combined health warning on both the front and back surfaces of the pack, equal numbers of lids and bases will now need to be planned-up per sheet (with matching warnings), meaning less packs formed per sheet and a resulting increase in production time (printing and coating) by around 60% according to the industry.

An alternative option would be to apply warnings using irremovable stickers, however this would also require a significant investment, for example to add a bypass process to the current production line, and it was anticipated that some tins may require up to 7 stickers (including barcodes etc).

It was also highlighted that for all shallow tins, if the General Warning and/or Information Message were to be applied to the sides of these packs, rounded corners would have to be avoided if pre-printed, due to distortion which occurs as a result of the forming process. The shallow depth of many cigarillo tins (10mm is the most common size used in the UK) will also prevent warnings from being pre-printed or stickered, though it would be possible to make the base deeper to hold the warnings if necessary. It was also pointed out that at present, only around 50% of tins are printed on the inside of the lid.

Round tins

The application of the combined health warning to round vacuum tins, commonly used for pipe tobacco, may prove to be challenging because Article 10.1.c specifies that these warnings are applied to the *curved* surface. Because of the production method for these packs – the tin is printed and then formed by being pressed through tin plate, whereas it *may* be possible to print very small type without distortion, the curved surface would not be considered a printable area for picture messages.

Therefore it is likely that irremovable stickers will need to be used, however the narrow area of the tin bases may also cause issues, since application tolerances of +/-1.5mm could result in inaccurate placement.

Tins with removable lids

For pack types which have removable lids, it was pointed out that the requirements of TPD II to have the same combined health warning on the front and back of pack will now mean that lids will have to be matched to the correct base, which in many cases will add an additional stage to the production process.

4. Audit of packs in other jurisdictions – Australia, Canada and Brazil

Comparisons with tobacco packaging in Australia, Canada and Brazil were undertaken to inform the design of the combined health warnings. This primarily covers elements of warning design (e.g. size, positioning, colour, text), and also information on legislation and research informing warning design in these countries, where this is available.

References for the audit are provided in Annex 1.

4.1. Australia

Comparisons with Australia were conducted for factory-made cigarettes, RYO, cigars, cigarillos and pipe tobacco.

Product warnings

For cigarettes, as the images opposite illustrate, warnings cover 75% of the pack front and 90% of the back, with an information message on one side of the pack. Since the introduction of plain (standardised) packaging, only flip-top cuboid packs are allowed for cigarettes. Although pack size differs for cigarettes (ranging from 20 to 50 cigarettes per pack), the basic pack format is identical.



The primary (headline) text warning (e.g. SMOKING CAUSES PERIPHERAL VASCULAR DISEASE) starts from the top of the pack and is white on a black background on the pack front, and white on a red background on the pack reverse, both with an accompanying image below. The primary warning on the reverse is also accompanied by a corresponding explanatory message below the image, which is specific to each primary warning. The warning on the pack reverse also includes cessation information (quitline and website address) at the base of the warning, with the quitline also contained within the image itself. The information message is, like the explanatory text, specific to each warning. The information message, displayed on one of the side panels, is black on a yellow background.

For RYO, two types of pouches were obtained – those with a flap and standing pouches. For RYO pouches with a flap, the health warnings cover 75% of the front and 90% of the back of the pack. Warnings appear on the front and the back of the pouch, with the information message printed under the flap of the pack. In terms of shape, the majority are flat bottomed pouches with no cylinders or buckets identified.



For RYO standing pouches, warnings cover 75% of the front and the back of the pack, with the image only appearing on the front of pouch. The information message is printed on the bottom of the pouch.



For cigars and pipe tobacco, they generally follow the same style and layout principles as cigarettes, however little cigars in tins do not feature an image on the back of pack, and cigar tubes only require a text warning. It is worth noting that although cigars do not require an information message to be displayed on packs, some cigar packs contained an information message, specifically a cigarette type pack and a pouch with flap.



Legislation

Pictorial health warnings were introduced in Australia in 2006, the seventh country to do so, under the Trade Practices (Consumer Product Information Standards) Tobacco Regulations 2004. This required the display of seven (rotating) pictorial warnings on 30% of the pack front and 90% of the pack reverse – warnings were to start from the top of the pack. The Competition and Consumer (Tobacco) Information Standard from 2011 and currently in force required, from January 2012, two new sets of pictorial warnings (with seven in each set) to be displayed on 75% of the pack front and 90% of the pack reverse, with each set rotated annually. Information messages that correspond with a particular warning are also required, so there are 14 information messages in total.

For pouches, the information message must be printed within a rectangle measuring at least 80mm by 25mm, and be positioned either in the centre of the inside surface of the flap, or in the centre of the surface of the pouch that is under the flap, and as close as possible to the top edge of the sealed inner pouch.

For other retail packaging which are not explicitly mentioned, such as the standing pouch, the information message is to appear on one of those largest outer surfaces other than the front and back. For the standing pouch this means that the bottom of the pack is the only option to carry the message.

For cigars in small cylinders (which includes tins), only the primary warning (without the image) and explanatory text is required on the pack, to cover at least 60% of the total surface area. For cigar tubes, five short rotating text only warnings (without the image or explanatory text) are required to cover 95% of the total surface.

The Competition and Consumer (Tobacco) Information Standard is separate from, but linked to, the 2011 Tobacco Plain Packaging Act, which was implemented from October 2012. The Plain Packaging Act essentially requires the removal of full branding and all embellishments from tobacco packaging, excluding brand name, and standardisation of various elements of pack design, e.g. pack colour, font, typeface and positioning of brand name. For cigarettes, all packs must be made of cardboard, rigid, rectangular, straight edged and with a flip-top opening.

Elements of warning design

Layout of warning

When plain packaging, combined with the new health warnings, was tested, the only format tested was the text warning at the top of the pack with the image below. No explanation is offered as to why the text, rather than image, appears at the top of the pack.

Colour

Qualitative testing with adult smokers did however reveal that for the primary warning, having white on a red background on the front of plain packs, rather than on a black background, detracted from the image, with some smokers suggesting that the red primary warning allowed them to escape from the image (GfK Bluemoon, 2011a). There was no testing of alternatives on the back of packs, with the primary warning always on red because this was the layout for the previous set of warnings in this country (GfK Bluemoon, 2011a).

Text

The text requirements for the warning statements on the front and back of retail packaging are:

- a) in Helvetica
- b) in upper case and bold type
- c) white on a black background (pack front) or white on a red background (pack reverse)
- d) clear and legible

- e) in the same point size throughout the statement
- f) of such a size that the text fills, as nearly as possible, the background on which it is displayed.

The text requirements for the explanatory and information messages are the same as for the primary warnings, except that they are to be in both upper and lower case. The text requirements for the information message also differ from the primary warnings and explanatory message in that it is black on a yellow (rather than white) background.

Information message

Based on qualitative research with adult smokers, the bright yellow used for the side-of-pack messages was chosen for being eye-catching (GfK Bluemoon, 2011b).

Summary of warnings in Australia

Australia is in the vanguard of tobacco control, and often considered the country with the most stringent tobacco control in the world. For packaging, the Competition and Consumer (Tobacco) Information Standard and Plain packaging Act mean that the dominant tobacco product in this country, namely factory made cigarettes, comes in almost identical packaging. This is similar to the less popular RYO, which seems to only be available in a limited number of pack formats.

It is unclear why the cessation information only appears on the back of the pack, even though the pack front is clearly the most visible surface to the user (WHO, 2008). Although the warnings and side of pack messages were tested, the benefits/weaknesses of having the image at the top of the warning rather than the text does not seem to have been investigated.

4.2. Canada

Comparisons with Canada were conducted for factory-made cigarettes, RYO, cigars and cigarillos.

Product warnings

For cigarettes, warnings cover 75% of the pack front and reverse, with an information message on 75% of one side of the pack. Given that Canada has two official languages, English text is shown on the front of the pack with French on the reverse – otherwise both the front and back of packs are identical.

For both the pack front and reverse, the image starts from the top of the pack with the primary warning, followed by explanatory text, below this. The primary warning is either yellow on a black background, or red on a yellow background. Aside from the warnings 'ORAL CANCER' and 'RISK OF BLINDNESS', the primary warning is a combination of upper and lower case letters. The primary warning is also accompanied by a corresponding



explanatory message, which is specific to each primary warning. The warning also includes cessation information (quitline and website address) at the base of the warning.



The information (toxic emissions) message, displayed on 75% of one of the side panels, is black on a white background. Narrow tax stamps are affixed to the lateral side of the pack.

For RYO tobacco packs in Canada, two types of pouch were identified – block bottomed pouches with a flap and ‘wrap around’ pouches with a flap.

For block bottomed pouches, warnings are orientated to landscape on the opening side and portrait on the flat side. The base of the pouch is used to display the information message and the inside of the flap is not used at all. For flat bottomed packs, only flap dimensions are calculated to inform placement and size of the warning.



For wrap around RYO pouches, the warning covers 50% of the front and 50% of flap at the back – all tobacco products other than cigarettes and little cigars are subject to older regulations which require only 50%. The information message is displayed across the crease at the top of the pouch.



Finally, in Canada cigarillos are also subject to the 75% warnings introduced in 2012. For the examples below the warning is only on one side of the pack. Schedule 1 of the Cigarettes and Little Cigars Act states that for two-sided packages only one side of the package requires a warning to be displayed.

For the cigars in the box, the inclusion of a warning on only 50% of one side of the pack is likely because the labelling for this pack is governed by the Tobacco Act, with Section 6(1) stating that every manufacturer of cigars contained in a box shall display entirely on one side of the pouch or box one of the bilingual warnings.



Legislation

Canada was the first country to introduce pictorial health warnings on packs in 2001, under the Tobacco Act, which came into force in 1997 - Section 17 provided the powers necessary to change labelling regulations. This required the display of sixteen (rotating) pictorial warnings on 50% of the front and back of packs – warnings were to start from the top of the pack. It also required the display of tar, nicotine, carbon monoxide, formaldehyde, hydrogen cyanide and benzene emission numbers on one side of packs.

The Cigarettes and Little Cigars Act in 2011 required, from June 2012, sixteen (rotating) new pictorial warnings to be displayed on 75% of the front and back of cigarette and little cigar packs, and four rotating information (toxic emission) messages on one of the side panels – it also required eight (rotating) pack inserts featuring gain-framed messaging to complement the on-pack warning. The federal government have yet to proceed with the second phase of large pictorial warnings for tobacco products other than cigarettes and little cigars (NSRA, 2013).

Elements of warning design

Layout of warning

When the new health warnings were tested, the image was at the top of the pack, with the text warning below.

Text

The text for the warning must be Helvetica, as specified in the Tobacco Act and Cigarettes and Little Cigars Act. However, sans serif typefaces, including Helvetica, appear to be commonly used in warning design (Sambrook Research International, 2009). It is not clear however why capitalisation is used for only two of the primary warnings.

Warning colour

In 1999, a series of focus groups were conducted to test the new health warnings to be placed on cigarette packs, with 67 messages and graphics tested in 35 focus group sessions (Environics, 2000). While most warnings tested had a yellow background, with black and red text and cessation information at the base of the warning (very similar to many of the current warnings in Canada), no information was provided for the colour selection of the warning design.

Information (toxic emissions) message

Qualitative research was conducted, on behalf of Health Canada, to test toxic emissions statements with adult smokers (Phoenix Strategic Perspectives, 2007). Yellow and white were identified as appropriate background colours. Yellow was most frequently identified as it is attention-grabbing, easy to read (black text against this colour background), and evocative. White was the second most frequently preferred background colour as it was considered easy to read black text against this background and familiar, i.e. they are used to it as a background colour on their cigarette packages. Some participants said they liked it because white is a sober and neutral colour, and it was suggested that including a statement on a white background conveys a sense that the information is offered to inform, not to influence.

A frequently made suggestion was to include a black border around the statements to draw attention to them.

Summary of warnings in Canada

Canada was the first country to introduce pictorial warnings, and having these warnings cover at least 50% of both principal display areas since 2001. Canada is also the only country to include pack inserts, with gain-framed messaging, inside packs to support these warnings. Warnings on packs have also been tested, as have information messages, although detail on the design of the warnings appears to be quite limited.

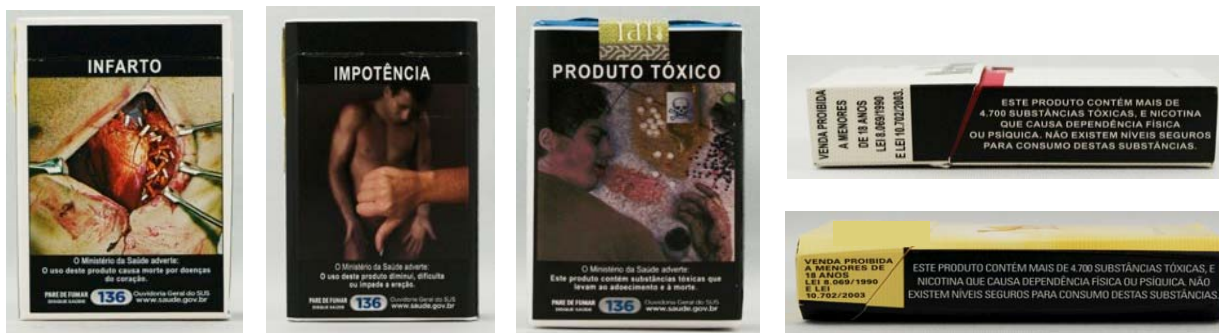
Few examples of RYO packs from Canada were identified, as was the case in Australia. Nevertheless, based on the packs obtained in both countries, the positioning of the warnings and the information message on RYO packs seemed to be more clearly defined in Australia.

4.3. Brazil

Comparisons with Brazil were conducted, for factory-made cigarettes, as we were unable to obtain other tobacco products. Other products, including RYO and cigars, are available on the Brazilian market but apparently have a small share of the tobacco market and, as such, had not previously been purchased by our colleagues, who were the source of our packs from this country.

Product warnings

For cigarettes, it is unclear whether there are any restrictions on pack format, although all cigarette packs found were available in either standard flip-top, bevel edge flip-top or soft packs. The warnings cover 100% of the reverse panel, with the primary warning, which is capitalised, positioned 12mm from the top of the pack; perhaps to prevent interference with the tax stamp on soft packs. The primary warning is white on a black background, with an accompanying image. On one side of packs there is an information message covering 75% of the surface, and an additional message stating that sale is forbidden to minors on the remaining 25%.



Legislation

Law No. 9.294 (1996) governs packaging and labelling of tobacco products in Brazil. This law was amended in 2001 by Provisional Measure No. 2.190-34, which required that all packaging display nine (rotating) pictorial health warnings, covering 100% of the back of packs. These appeared on packs from 2001, with Brazil the second country, after Canada, to require the display of pictorial warnings.

There have since been multiple regulations or resolutions that regulate Law No. 9.294 (Campaign for Tobacco Free Kids, 2014). In 2004, a second set of ten warnings was adopted, and also a requirement to display the phrase *“This product contains more than 4,700 toxic substances and nicotine which causes physical or psychic dependence. No safe levels exist for the consumption of these substances”* on 75% of one side of the pack. There was also a requirement to display the phrase *“Sale forbidden to minors under 18 – Law 8069/1990 and Law 10702/2003”* on the remaining 25% of the side panel.

A third set of ten pictorial warnings were required on packs from 2009, and these warnings are still present on packs in 2015.

Elements of warning design

Warning layout

There is little information available about the design of the warnings in Brazil, for instance why warnings were confined to the back, why the primary warning is at the top of the pack, the choice of font, why capitalisation is used for the primary warning, etc.

Colour

In terms of background colour for the warning, black was chosen 'in order to preserve the visual warning characteristics' (Federal Office Gazette, 2003, p.4). ANVISA, the National Health Surveillance Agency with the legal power to evaluate, regulate and control tobacco products, notes that 'tobacco companies were against the use of black in the warnings and pictures established by law 9.294 because black is associated to controlled drug packs' (ANVISA, undated).

For the side of pack information message, this has to occupy the width of 75% of one of the sides of the pack, using white letters on a black rectangular background. The reason to use white text on the black background for the information message is presumably the same as for the primary warnings. For the message about sales to minors being forbidden, which has to occupy the other 25% of the side panel, the legislation simply states is that this should be 'in a contrasting and easily legible type' (Federal Office Gazette, 2003, p.4).

Tax stamp

For the tax stamp, it is noted that this shall not be placed over the image, nor may there be a reduction or change of the graphics parameters of the standard images to adapt the stamp to the largest side – as previously suggested, this may explain why the primary warning is positioned 12mm from the top of the pack.

Summary of warnings in Brazil

Since 2001 warnings have only ever been positioned on the less visible reverse panel, and have not been rotated since the third set of warnings were introduced in 2009. From January 2016, packs in Brazil will be required to carry a text warning on 30% of their front of packs. There is, however, limited information about warning design.

5. Placement considerations for combined health warnings

Disclaimer: This report provides suggestions; other placements may be possible.

Various factors needed to be considered when defining the dimensions, shape and position of the combined health warnings, including:

- the different opening and closing mechanisms of packs;
- production processes (see Section 3);
- parts of the package that are used during display, but then removed; and
- the size and position of Tax Stamps (where required).

5.1. Identifying the front and back surfaces

Whilst Article 10.1.c states that *“Cylindrical packets shall display two combined health warnings, equidistant from each other, each covering 65% of their respective half of the curved surface”*, for pack types other than cylinders, it states that the warnings should *“cover 65 % of both the external front and back surface of the unit packet and any outside packaging”*.

For most pack types, it is clear as to what would be defined as the front and back surfaces, however for packs such as some hinged boxes, some tins and some outer/display packs (in all sectors), this could be defined as the sides in some cases, and in other cases as the top and bottom.

Therefore, for the purposes of positioning the combined health warnings on such packs, the larger surfaces have been identified as the front and back when illustrating the placement of warnings in Section 7.

5.2. Shape and position of the combined health warning

Flip-top cigarette packs

Since Article 8.3 of the TPD allows for warnings to be split when opening on flip-top cigarette packs, the layout of the combined health warning needed to be considered to ensure the graphical integrity and visibility of the text, photography and cessation information once the pack was in use.

Bevel corner flip-top packs and rounded corner flip-top packs

Recital 28 of the TPD specifies that for bevel and rounded corner packs the combined health warning should cover *“a surface area that is equivalent to that of a unit pack without such edges”*, meaning that the 65% is calculated based on dimensions as if the pack has square edges.

The warnings are positioned to fit the width of the flat area of the pack in each instance, but not extend around the bevelled/rounded corners. This may mean that, in some cases, these will need to be slightly modified to allow for the minimum 52mm width of combined health warning (as stipulated in TPD II) to fit the width of the flat area of the pack.

Wrap-around pouches

It was highlighted in industry interviews that due to the length of flap on the majority of wrap-around pouches, it would not be possible to fit a full combined health warning on the flap that equated to 65% of the surface, since the flaps are generally too short. Many of the companies interviewed had therefore indicated that they were looking in to, or had already invested in, extending the length of the flap, since they could not see any other solution that would be compliant with the TPD. The amount by which the companies were looking to extend the flap varied from a few mm, up to around 25/30mm which would cover approximately 90% of the pocket surface. It was indicated that it would not be possible to have a flap that covered 100% of the pocket, because the Tax Stamp and self-adhesive seal need an area to overlap.

However, companies did also highlight the expense and lead time that this change would incur.

One company did have an alternative suggestion to avoid the lengthening of the flap, suggesting that the CHW could be printed both across the flap, onto the pocket, as well as fully onto the pocket. And whereas this would mean the warning would be split, by having the whole warning printed underneath the flap, the warning would remain intact when opening the pack. However, due to varying tolerances in the printing and folding of pouches, it may not be possible to guarantee the alignment of warnings across the split, which could distort the combined health warning when the pack is closed.

Flat-bottomed pouches

Whereas flat bottomed pouches generally have a flap that is deep enough to carry a 65% combined health warning, the industry audit did suggest that in some cases, as with wrap-around pouches, the flap may need to be extended, since the warning would not leave enough clear space for the position of a Tax Stamp.

Wrap-around pouches and flat bottomed pouches

The audit in WP1 indicated that pouches with flaps are not consistent in the orientation of branding, with some branded in a portrait format and some landscape; though packs are generally merchandised on their end, to save space. It was therefore suggested that the technical specifications illustrated both options.

Standing pouches

Standing pouches have a removable strip that is either cut or torn to open, and the pouch is then re-sealed with a zip lock. Because the strip is then discarded, this area has not been included in the dimensions of the surface when calculating the size of the combined health warning, and the warning has been positioned below the cut line.

Industry interviews highlighted the fact that print quality could not be guaranteed along the sealed sides of the pack due to print tolerances, therefore the combined health warning has also been positioned to sit within these areas, as well as allowing for the position of a Tax Stamp across the seal.

Cylinders

Article 10.1.c states that *“Cylindrical packets shall display two combined health warnings, equidistant from each other, each covering 65% of their respective half of the curved surface”*. Based on this, each half of the curved surface has been calculated as half of the circumference of the cylinder. This was calculated based on the surface of the cylinder, including the area covered by the lip of the lid when positioned on the pack

The warning is aligned with the base of the lid (rather than the top of the pack), so it is not partially hidden or interrupted by the lid. It has also been positioned to allow for the placement of a Tax Stamp from the lid to the base, and to ensure that the warning is fully visible when viewed from the front or back.

Cylindrical buckets

As with cylinder packs, each half surface has been calculated as half of the circumference, though not including the protruding ‘lip’ of the pack. The combined health warning has then been aligned to the top edge of the surface, below the protruding ‘lip’.

Upright tins

Because the front and back surfaces of upright tins have rounded corners, like cigarette packs with rounded corners, the shape and size of the warning is calculated based on dimensions as if the pack has square edges and positioned to fit the width of the flat area of the pack, but not extending around the corners.

Rectangular tins

Where tins have a raised edge, the shape and position of the warning has been calculated to sit entirely on the flat surface, without overlapping this area, to avoid issues of distortion of the combined health warning.

Shell & slide box

From the samples seen, many shell/hull & slide boxes have a window area on the front of pack. However, because the combined health warning must be 65% of the front surface and align to the top of the pack, it may mean windows will need to be moved.

Cigar tubes

As with other cylindrical pack shapes, the front and back curved surfaces have each been calculated as half of the circumference of the tube, including the area covered by the lip of the lid when positioned on pack, but not the rounded tip. A solution has been provided for the placement of two combined health warnings, each covering 65% of their respective half of the curved surface of a cigar tube.

Cigar bundles

Whereas cigar bundles are not as common as other pack formats, they account for a significant proportion of revenue in the handmade sector. From samples that were provided, the bundled cigars are wrapped in clear transparent film, which either contains a branded paper insert or is labelled with a branded sticker, however the cigars are also branded and this is visible through the film wrapper. Because Article 10.1.e of the TPD states that "*no names or logos shall be positioned above the health warnings*", this may mean that the insert (or label) on which the combined health warning will be printed, may need to be extended to ensure that the branding on each individual cigar is not visible.

Outer display packaging

Some of the outer display packaging identified in WP1 for cigars and cigarillos involves two layers, one that encloses the whole pack for use in transit/wholesale, which is then peeled back and removed to create a display unit, used in retail. Warnings have therefore been positioned to be visible on the front and back of both layers, before and after the outer layer is removed. In the case of outer display packaging for individual cigar tubes, it is assumed that each cigar will also carry a warning message (if the full regime is to be applied).

5.3. Positioning of Tax Stamps

Following the audit in WP1, it was established that Tax Stamps currently vary in size in different Member States, with the smallest dimensions identified as 18mm x 43.5mm and the largest 24mm x 46mm.

Industry consultation also highlighted the fact that the precision possible in the application of Tax Stamps varied by pack type, material, machine and supplier, with application tolerances of up to +/-4mm and that applying Tax Stamps around a creased (or non-flat) area is technically more challenging.

In general, different machines are used for sticking stamps in different places, because stamps are not always uniform or positioned in the same places, and concern was raised about the loss in revenue for every Tax Stamp that was incorrectly positioned or lost, due to each stamp having a face value.

Flip-top packs

Tax Stamps are currently affixed horizontally, from one lateral side (across the area where the pack splits) to the back of pack. A three year exemption (to May 2019) will allow for stamps to remain in this position, however after this period, the combined health warning on the back surface will need to align to the top of the pack. This will therefore require the Tax Stamp to be repositioned to affix vertically from the top of pack to one of the lateral surfaces (across the area that splits to open), so that it will not hide or interrupt the combined health warning, but still ensure that it is torn once the pack is first used. This will require additional investment by the industry, but is technically possible.

From the audit of packs carried out in WP1, it was established that Tax Stamps can vary significantly in width (from 18mm to 24mm). Therefore, because the TPD II allows for a minimum width of 20mm for the lateral surfaces of flip-top packs for cigarettes, some of the wider Tax Stamps may need to be resized to ensure that they fit onto the side and don't overlap the front or back surface, interrupting the combined health warning. An application tolerance of +/-2mm would also need to be allowed for, meaning that stamps may not necessarily be centred within the lateral surface.

The industry also pointed out that some Tax Stamps use holograms which in turn make the stamp thicker and therefore more difficult to fold and/or glue. They also highlighted that when Tax Stamps are repositioned, it is important to ensure that the use of any holograms, serial numbers and/or machine-readable code is not impacted.

A preference for digital Tax Stamps was highlighted by several stakeholders.

Soft packs for cigarettes

Soft packs are sealed by a 'banderole' (adhesive label) which affixes from the front of the pack, across the top, to the back of pack. This forms an integral part of the pack, by holding together the inner aluminium and outer soft card layers. In many cases, the Tax Stamp is used in place of the banderole.

Whereas an exemption may apply to soft packs until May 2019, allowing for an area of up to 13mm for the placement of a Tax Stamp above the combined health warning on both front and back surfaces, after this time the combined health warning must be aligned to the top edge of the pack.

Therefore it is likely that the Tax Stamp will need to move position from this date, affixing from the top of pack to one of the lateral sides. However, if this is the only way the pack is sealed, it may affect the integrity of the pack, meaning the inner aluminium layer could fall out.

It was therefore proposed that, whilst the Tax Stamps would still need to be repositioned, a separate clear, unprinted banderole was used for sealing purposes, which could be applied over the combined health warning, without hiding or interrupting any of the warning. Alternatively, the banderole could be affixed to the aluminium layer, with the printed outer soft card layer attached to the inner layer using glue dots.

As with flip-top boxes, Tax Stamps may need to be narrower, so that they fit within the lateral surface, since those that are wider than the side of the pack (average 20-22mm) may overlap to the front and/or back of the pack, therefore hiding or interrupting the combined health warning. It was also highlighted that whereas it should be technically feasible to affix the stamps in this position (extending from the top of pack and down the side), in many cases it would require new machinery for application and would also face significant challenges due to the flexibility of this particular type of pack – gaps created between the side of the pack and the cigarettes, and soft (rounded) corners may both impact on the ability to fix the Tax Stamp onto a firm surface to ensure full gluing.

Pouches with flaps

Tax Stamps are currently applied across the flap onto the pocket, so that the stamp must be broken when first opening the pack. The application of Tax Stamps was raised by the industry, highlighting the fact that at present they were applied away from the pack edge (up to 18mm for wrap-around pouches and 10mm for flat bottomed pouches), as a solid, flat surface was required to apply the stamps correctly. And whereas Tax Stamps could generally be fairly accurately positioned, tolerances of up to 4mm meant that positioning could differ by this amount between packs. If stamps were to move nearer the edge of the pack, or extend from the front of the pouch to the back (around the crease), different machinery would be required or packaging machines would need to be reconfigured, both of which would require significant investment.

Due to the width of some wrap-around pouches and the larger dimensions of Tax Stamps for some countries, the industry may have to extend the width of the pouch as a whole, as well as lengthen the flap, to accommodate the 65% CHW and larger (24mm x 46mm) Tax Stamps that are used currently. However, if Tax Stamps could be made smaller across all Member States, it is envisaged that less adjustment would need to be made to the pouch sizes.

Standing pouches

Tax Stamps are currently applied across the tear strip, so that they are torn when the pack is first opened. As with pouches with flaps, they can be fairly accurately positioned, however application tolerances can be +/- 2mm, so the combined health warning would need to be positioned to allow for this.

Cylinders

From the cylinder samples provided and consultation with stakeholder, it was established that in some cases the Tax Stamp can be fairly accurately positioned in line with a pre-printed locator, with an application tolerance of +/-1mm, whilst on other packs, the application is entirely random. Feedback from the industry indicated that this was generally down to the machine used at production, with some production lines having the capability to orientate the

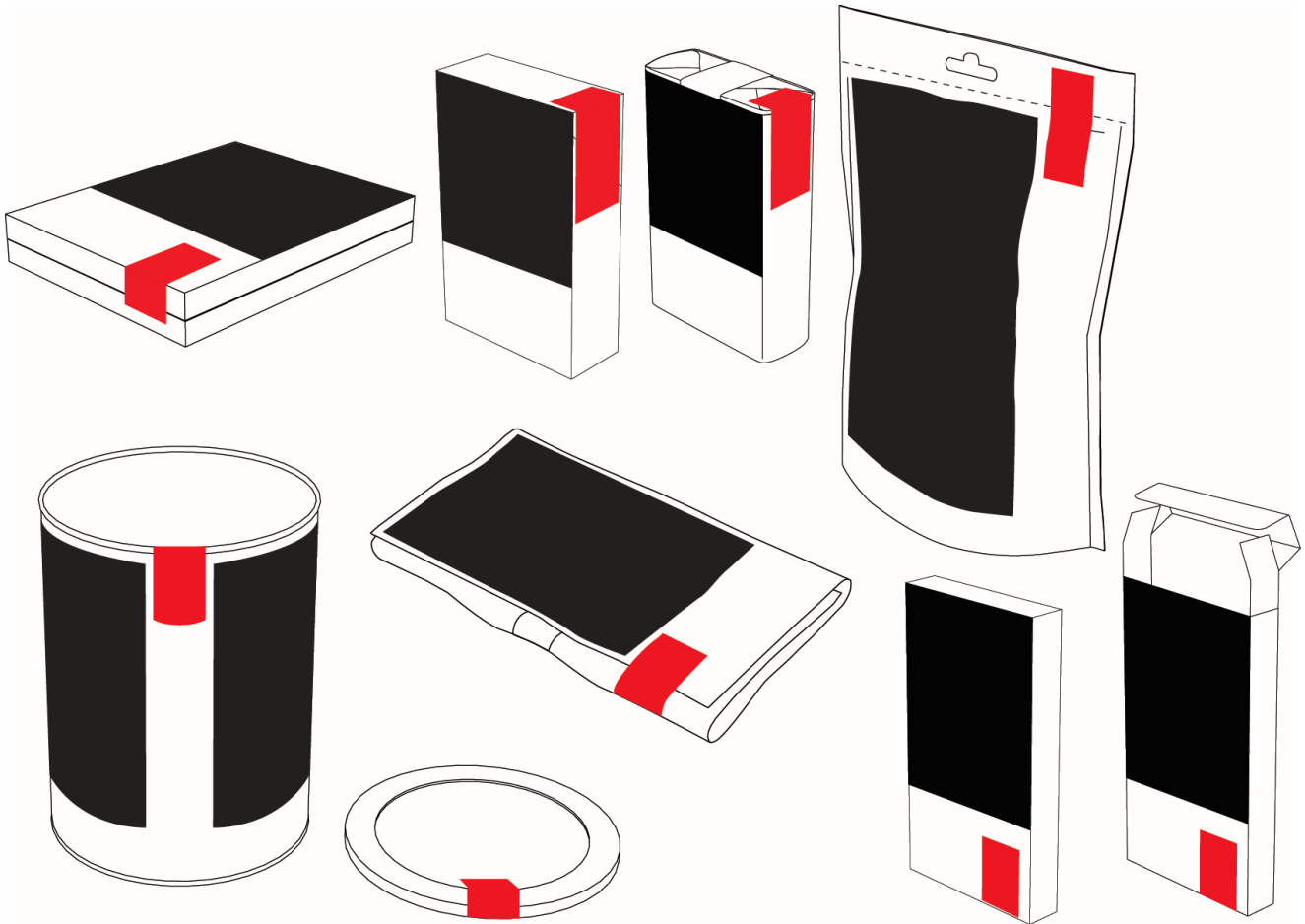
pack and register the stamp between the two equidistant combined health warning, whilst others can't.

This would therefore suggest that machines may need to be upgraded by some companies, to ensure that Tax Stamps can be applied to cylinders without hiding or interrupting the combined health warnings.

Shell & slide box

Shell & slide boxes generally have narrow lateral sides (of around 15mm), meaning that Tax Stamps may need to be positioned on the front of the pack, rather than running from the top surface and down the sides.

5.4. Examples of combined health warning and Tax Stamp positioning



6. Design and layout concepts for combined health warnings

6.1. Establishing key design principles

6.1.1 Identifying a core set of warning shapes

Once the proportions of each combined health warning had been established for each of the 25 different pack shapes, calculated to cover the 65% surface area specified in Article 10 and allowing for the position of an 18mm wide Tax Stamp, a core set of 6 shapes was then identified to illustrate the design concepts for the 'look & feel' of the combined health warnings – 4 shapes from which the warnings could be easily implemented across most of the 25 packs, without the need for too much redesign, plus an additional 2 shapes that allowed for the worst case scenarios of cigar tubes and round pipe tins.

Core set of 6 shapes



6.1.2 Initial design exploration

The initial stage of the design process was to establish the basic principles on which the concepts would be based, such as typeface, balance of image versus message and preferred options for colour and incorporation of cessation information.

Since the most prevalent pack format in smoked tobacco is the flip-top cigarette pack, the small squarer shape was selected for illustrating the design exploration stage, which represented 65% of the back of a pack. (In this one instance, the front and back of packs needed to be treated differently, due to the splitting of the front surface on opening the flip-top pack, so the back of pack was more representative of how the combined health warning would appear on most pack types).

One warning message (and accompanying image) "Your smoke harms your children, family and friends" was also selected, since it represented the longest message (across all languages), and both one language and three language versions (as per requirements in Belgium) were considered.

Typography

The message on the current picture warnings uses the typeface Myriad Pro Black Condensed, however it was felt that an alternative font might be more legible, since some characters are harder to read (such as the **c** and **y**). And whilst the General Warning and Information Message are specified as the Helvetica Bold font in the TPD, it was felt that a condensed typeface should be used for the combined warnings, to ensure that the message could be used at least a size as possible, in the space allocated.



Three alternative typefaces were considered – Helvetica Neue Bold Condensed, Univers Bold Condensed and Frutiger Bold Condensed.

The Helvetica was felt to be too square and the letter spacing quite tight, whilst the Univers was too condensed and some characters were less easy to read (such as the **y**).

Frutiger Bold Condensed was therefore selected as the preferred option, since the letters are clear to read and evenly spaced, and this was tested across all language versions of the messages to ensure that all characters were accurately represented.

The warning was also considered in both upper and lower case type. However, it is generally accepted that capitals are harder to read and that using all UPPER CASE can reduce the speed and ease with which words can be read.

“The most common explanation is that we don’t read letter-by-letter, but rather by word shapes, which are in part created by the position and

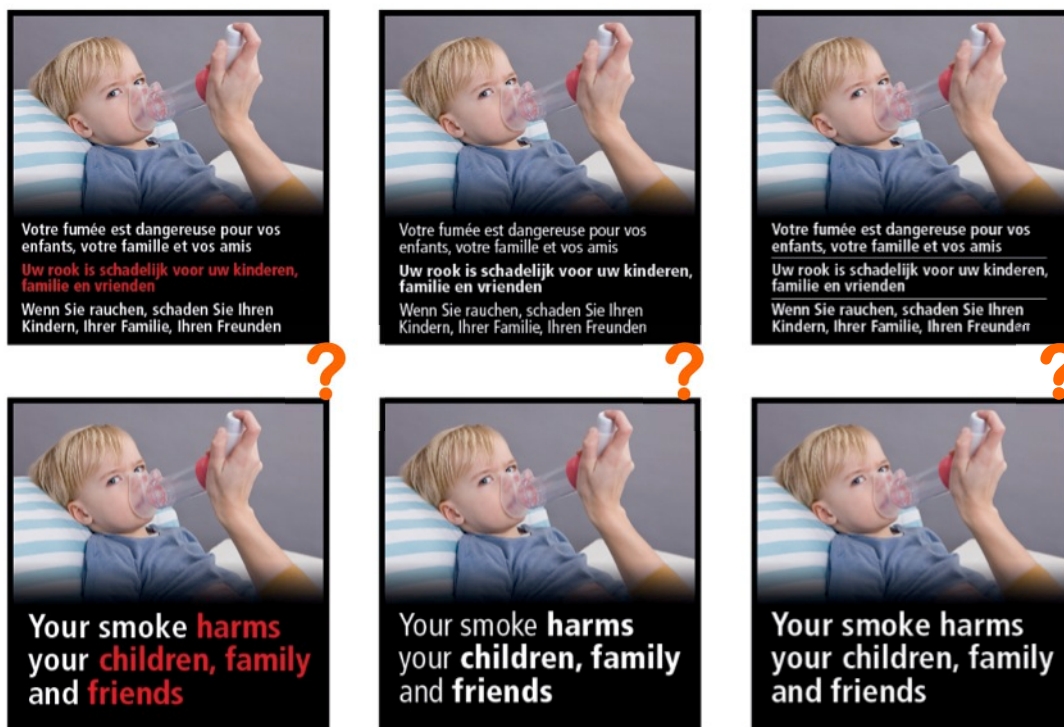


frequency of ascending and descending characters. But in all cap settings, such word shapes are lost, making it more challenging, and slower going, to read. Some recent research has disputed this ‘word shape’ explanation, but it is widely acknowledged that all cap settings are more difficult to read than lowercase. What we read most often (mostly lowercase) is what we read more easily.”²

Using emphasis on some words

The current picture warnings use different colours of type (white and red) to add emphasis to certain words. However, the question was raised as to whether this helped with legibility and impact of the warning or whether it was clearer if the whole phrase was in one colour.

The design concepts in Section 6.2 investigated different solutions, using both colour and weight of type (e.g. regular versus bold) to emphasise certain words, as well as options without emphasis.



² <http://www.fonts.com/content/learning/fyti/situational-typography/all-caps>

Gradient between text and picture

It was felt that the current black gradient that divided the warning image from the message could obscure parts of the picture in some cases and also meant that the message versus image area was less defined.

Options were considered where a harder, and therefore narrower, gradient was used, but it was felt that a 'hard' divide provided a more functional and serious look for the warning messages.



Placement of smoking cessation information

With the implementation of TPD II, it will now be mandatory for the combined health warning to incorporate cessation information, such as telephone numbers, email addresses or web addresses, to inform consumers about the programmes that are available to support those who want to stop smoking. Each Member State was asked to specify the detail that they wanted to include in their cessation information throughout the audit in WP1, however many were yet undecided as to the exact details. Therefore, a placeholder telephone number and web address were used for design purposes, to establish the best position of the information. Icons were also introduced on one version, since some countries (eg France) have indicated that they would like to use symbols.



From the options considered, it was felt that if the contact details were too small, there was not enough emphasis on the cessation information and it might be hard to read.

Separating the information into a separate (coloured) panel helped with legibility, though the preferred position was at the top or bottom of the combined health warning, so that the cessation information didn't split the warning and its associated image.



Balance of image versus message/cessation information

The balance of the image versus the warning message (and cessation information) was also considered. Clearly, the image should be of a reasonable size to have an impact on the consumer, however this does have an impact on the size (and therefore legibility) of the message.

In the design concepts in Section 6.2, the image is aligned to the top edge of the warning panel (or left edge for landscape formats) and options were shown where the image stretched to 60% of the longest edge, as well as versions where the image stretched to only 50% of the longest edge, thus enabling a significantly larger message.



Colour

Finally, following the audit of other jurisdictions in Section 4, it was established that there were three distinct colours used for tobacco warnings – black, red and yellow – and these also reflect the colours most commonly used for hazard/warning signs in other environments, such as road signs, chemicals etc. The design concepts in Section 6.2 were therefore based around these three colours.



6.2. Design proposals

Following the initial stage of the design process where the basic principles of design, type, layout and colour were established (as described in Section 6.1), 13 design proposals were created, based on these principles.

To clearly illustrate how each design might look in reality, proposals were visualised on standard flip-top cigarette packs, since these are the most common pack format for smoked tobacco products. Because the FRONT of flip-top cigarette packs have the added challenge of the combined health warning being split as the packs open, design proposals were visualised as they would appear on the BACK of a flip-top pack, where the warning will not be split.

6.2.1 Design option 1



Comparison to other jurisdictions

vs Australia: smaller message with emphasis on some words is harder to read; though lower case type aids legibility; similar size image; better stand-out of cessation information & it appears on both faces, not just back

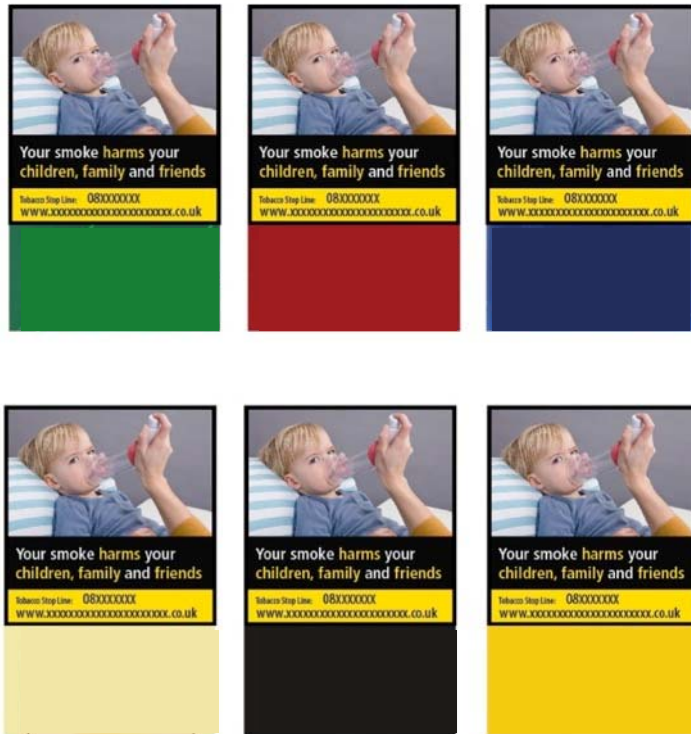
vs Canada: although shorter message is more direct, the emphasis on some words is harder to read; multiple languages on both faces means message will get quite small, whilst Canada prints different languages on each side; consistent use of colour/type etc across all 14 warnings is considered preferable to the different designs styles used in Canada

vs Brazil: clearer photography gives more impact, though images are smaller; cessation information has better stand-out; use of colour adds impact

Evaluation of proposal

- ✘ red & white text is quite recessive and emphasis on words makes it look 'busy' and breaks up the message
- ✓/✘ 60% image adds impact, but means that the message is quite small in 1 language & may not be readable for multiple language versions
- ✓ yellow panel for cessation information provides good stand-out

6.2.2 Design option 2



Comparison to other jurisdictions

vs Australia: smaller message with emphasis on some words is harder to read; though lower case type aids legibility; similar size image; better stand-out of cessation information & it appears on both faces, not just back

vs Canada: although shorter message is more direct, the emphasis on some words is harder to read; multiple languages on both faces means message will get quite small, whilst Canada prints different languages on each side; consistent use of colour/type etc across all 14 warnings is considered preferable to the different designs styles used in Canada

vs Brazil: clearer photography gives more impact, though images are smaller; cessation information has better stand-out; use of colour adds impact

Evaluation of proposal

- ✓/✘ yellow & white text is clearer to read, but emphasis on words makes it look 'busy' and breaks up the message
- ✓/✘ 60% image adds impact, but means that the message is quite small
- ✓ yellow panel for cessation information provides good stand-out

6.2.3 Design option 3



Comparison to other jurisdictions

vs Australia: smaller message with emphasis on some words is harder to read; though lower case type aids legibility; similar size image; better stand-out of cessation information & it appears on both faces, not just back

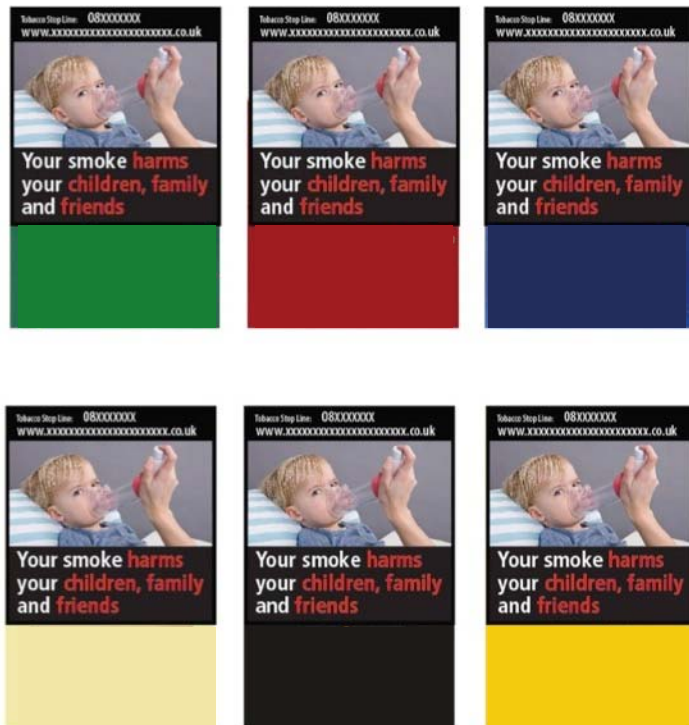
vs Canada: although shorter message is more direct, the emphasis on some words is harder to read; multiple languages on both faces means message will get quite small, whilst Canada prints different languages on each side; consistent use of colour/type etc across all 14 warnings is considered preferable to the different designs styles used in Canada

vs Brazil: clearer photography gives more impact, though images are smaller; cessation information has better stand-out; use of colour adds impact

Evaluation of proposal

- ✓/✗ yellow & white text is clearer to read, but emphasis on words makes it look 'busy' and breaks up the message
- ✓/✗ 60% image adds impact, but means that the message is quite small
- ✓/✗ red panel for cessation information may provide better stand-out, but it might be too colourful

6.2.4 Design option 4



Comparison to other jurisdictions

vs Australia: emphasis on some words is harder to read, though lower case type aids legibility; slightly smaller size image; clearer cessation information as it's separated from the message & it appears on both faces, not just back

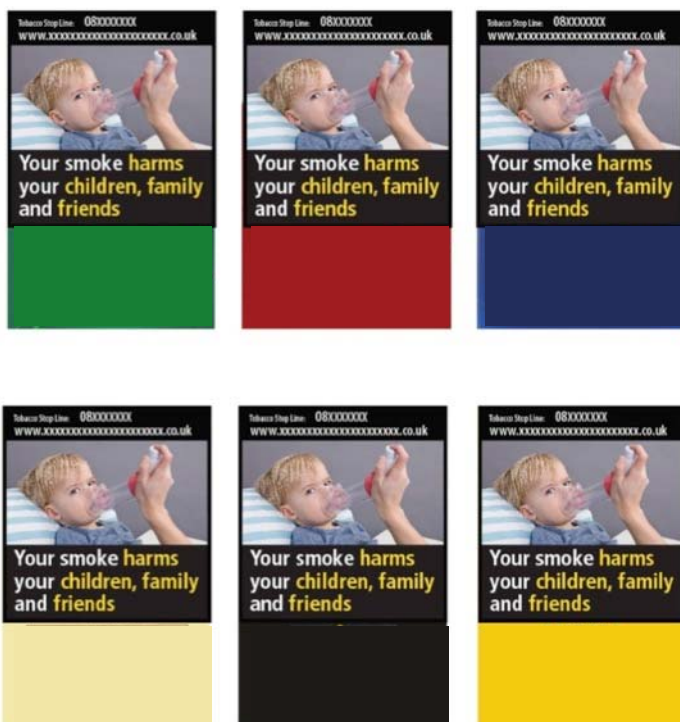
vs Canada: although shorter message is more direct, the emphasis on some words is harder to read; multiple languages on both faces means message will be smaller, whilst Canada prints different languages on each side; consistent use of colour/type etc across all 14 warnings is considered preferable to the different designs styles used in Canada, but lots of black may be too recessive

vs Brazil: clearer photography gives more impact, though images are smaller; separating the cessation information gives better stand-out

Evaluation of proposal

- ✓/✗ larger text is clearer to read, but emphasis on words makes it look 'busy' and breaks up the message
- ✓/✗ 50% image allows for larger message, though less impactful than 60% image
- ✓/✗ cessation information separated from warning may provide better stand-out, but may get lost

6.2.5 Design option 5



Comparison to other jurisdictions
<p>vs Australia: emphasis on some words is harder to read, though lower case type aids legibility; slightly smaller size image; clearer cessation information as it's separated from the message & it appears on both faces, not just back</p> <p>vs Canada: although shorter message is more direct, the emphasis on some words is harder to read; multiple languages on both faces means message will be smaller, whilst Canada prints different languages on each side; consistent use of colour/type etc across all 14 warnings is considered preferable to the different designs styles used in Canada, but lots of black may be too recessive</p> <p>vs Brazil: clearer photography gives more impact, though images are smaller; separating the cessation information gives better stand-out</p>
Evaluation of proposal
<ul style="list-style-type: none"> ✓/✗ yellow/white text is clearer to read, but emphasis on words makes it look 'busy' and breaks up the message ✓/✗ 50% image allows for larger message, though less impactful than 60% image ✓/✗ cessation information separated from warning may provide better stand-out, but may get lost

6.2.6 Design option 6



Comparison to other jurisdictions
<p>vs Australia: emphasis on some words is harder to read, though lower case type aids legibility; slightly smaller size image; clearer cessation information as it's separated from the message & it appears on both faces, not just back</p> <p>vs Canada: although shorter message is more direct, the emphasis on some words is harder to read; multiple languages on both faces means message will be smaller, whilst Canada prints different languages on each side; consistent use of colour/type etc across all 14 warnings is considered preferable to the different designs styles used in Canada, but may be too colourful</p> <p>vs Brazil: clearer photography gives more impact, though images are smaller; separating the cessation information and use of colour gives better stand-out</p>
Evaluation of proposal
<ul style="list-style-type: none"> ✓/✗ yellow/white text is clearer to read, but emphasis on words makes it look 'busy' and breaks up the message ✓/✗ 50% image allows for larger message, though less impactful than 60% image ✓/✗ cessation information separated from warning on red panel provides better stand-out, but may distract from image

6.2.7 Design option 7



Comparison to other jurisdictions

vs Australia: emphasis on some words is harder to read, though lower case type aids legibility; slightly smaller size image; clearer cessation information as it's separated from the message & it appears on both faces, not just back

vs Canada: although shorter message is more direct, the emphasis on some words is harder to read; multiple languages on both faces means message will be smaller, whilst Canada prints different languages on each side; consistent use of colour/type etc across all 14 warnings is considered preferable to the different designs styles used in Canada, but may be too colourful

vs Brazil: clearer photography gives more impact, though images are smaller; separating the cessation information and use of colour gives better stand-out

Evaluation of proposal

- ✓/✗ red panel is eye-catching, but may detract from the image
- ✗ yellow/white text is difficult to read, emphasis on words makes it look 'busy' and breaks up the message
- ✓/✗ 50% image allows for larger message, though less impactful than 60% image
- ✓/✗ cessation information separated from warning may provide better stand-out, but could be missed

6.2.8 Design option 8



Comparison to other jurisdictions

vs Australia: emphasis on some words is harder to read, though lower case type aids legibility; slightly smaller size image; yellow panel is more impactful; clearer cessation information as it's separated from the message & it appears on both faces, not just back

vs Canada: although shorter message is more direct, the emphasis on some words is harder to read; multiple languages on both faces means message will be smaller, whilst Canada prints different languages on each side; consistent use of colour/type etc across all 14 warnings is considered preferable to the different designs styles used in Canada; similar yellow panel used which adds impact, but two colour text harder to read

vs Brazil: clearer photography gives more impact, though images are smaller; separating the cessation information and use of colour gives better stand-out

Evaluation of proposal

- ✓ yellow panel is more impactful
- ✗ emphasis on words makes it look 'busy' and breaks up the message
- ✓/✗ 50% image allows for larger message, though less impactful than 60% image
- ✓/✗ cessation information separated from warning may provide better stand-out, but could be missed

6.2.9 Design option 9



Comparison to other jurisdictions

vs Australia: lower case type aids legibility; slightly smaller size image; yellow panel is more impactful; clearer cessation information as it's separated from the message & it appears on both faces, not just back

vs Canada: shorter message is more direct; multiple languages on both faces means message will be smaller, whilst Canada prints different languages on each side; consistent use of colour/type etc across all 14 warnings is considered preferable to the different designs styles used in Canada; similar yellow panel used which adds impact

vs Brazil: clearer photography gives more impact, though images are smaller; separating the cessation information and use of colour gives better stand-out

Evaluation of proposal

- ✓ yellow panel is more impactful and combination of yellow & black is commonly associated with warning signs
- ✓ single colour message helps with legibility & comes across as more 'serious'
- ✓/* 50% image allows for larger message, though less impactful than 60% image
- ✓/* cessation information separated from warning may provide better stand-out, but could be missed

6.2.10 Design option 10



Comparison to other jurisdictions

vs Australia: lower case type aids legibility; slightly smaller size image; yellow panel is more impactful; clearer cessation information as it's in red & it appears on both faces, not just back

vs Canada: shorter message is more direct; multiple languages on both faces means message will be smaller, whilst Canada prints different languages on each side; consistent use of colour/type etc across all 14 warnings is considered preferable to the different designs styles used in Canada; similar yellow panel used which adds impact

vs Brazil: clearer photography gives more impact, though images are smaller; use of colour for cessation information gives better stand-out

Evaluation of proposal

- ✓ yellow panel is more impactful and combination of yellow & black is commonly associated with warning signs
- ✓ single colour message helps with legibility & comes across as more 'serious'
- ✓/* 50% image allows for larger message, though less impactful than 60% image
- ✓/* including cessation information in main panel simplifies the layout, but by not defining the area for cessation information could mean that this details becomes larger than the message

6.2.11 Design option 11



Comparison to other jurisdictions
<p>vs Australia: lower case type aids legibility; slightly smaller size image; clearer cessation information as it's in a yellow panel & it appears on both faces, not just back</p> <p>vs Canada: shorter message is more direct; multiple languages on both faces means message will be smaller, whilst Canada prints different languages on each side; consistent use of colour/type etc across all 14 warnings is considered preferable to the different designs styles used in Canada; similar yellow text on black panel used which adds impact</p> <p>vs Brazil: clearer photography gives more impact, though images are smaller; use of colour panel for cessation information gives better stand-out</p>
Evaluation of proposal
<ul style="list-style-type: none"> ✓ optimum hierarchy of information – 1) Image 2) Message 3) Call to action ✓/* single colour message helps with legibility & comes across as more 'serious', though yellow text may be a bit recessive ✓/* 50% image allows for larger message, though less impactful than 60% image ✓ yellow panel for cessation information provides good stand-out

6.2.12 Design option 12



Comparison to other jurisdictions
<p>vs Australia: lower case type aids legibility; slightly smaller size image; same use of white text on black adds impact; clearer cessation information as it's in a yellow panel & it appears on both faces, not just back</p> <p>vs Canada: shorter message is more direct; multiple languages on both faces means message will be smaller, whilst Canada prints different languages on each side; consistent use of colour/type etc across all 14 warnings is considered preferable to the different designs styles used in Canada; white text on black panel clearer to read</p> <p>vs Brazil: clearer photography gives more impact, though images are smaller; use of colour panel for cessation information gives better stand-out</p>
Evaluation of proposal
<ul style="list-style-type: none"> ✓ optimum hierarchy of information – 1) Image 2) Message 3) Call to action ✓ single colour message helps with legibility & comes across as more 'serious'; white text is clearer to read ✓/* 50% image allows for larger message, though less impactful than 60% image ✓ yellow panel for cessation information provides good stand-out

6.2.13 Design option 13



Comparison to other jurisdictions

vs Australia: lower case type aids legibility; slightly smaller size image; yellow panel is more impactful; clearer cessation information as it's separated from the message & it appears on both faces, not just back

vs Canada: shorter message is more direct; multiple languages on both faces means message will be smaller, whilst Canada prints different languages on each side; consistent use of colour/type etc across all 14 warnings is considered preferable to the different designs styles used in Canada; similar yellow panel used which adds impact

vs Brazil: clearer photography gives more impact, though images are smaller; separating the cessation information and use of colour gives better stand-out

Evaluation of proposal

- ✓ yellow panel is more impactful and combination of yellow & black is commonly associated with warning signs
- ✓ single colour message helps with legibility & comes across as more 'serious'
- ✓/✗ 50% image allows for larger message, though less impactful than 60% image
- ✓ cessation information separated from warning provides better stand-out

6.3. Preferred design options

Following consultation with the wider consortium advisory board, tobacco control experts and the Commission, two clear options were selected as preferred designs – Options 12 and 13 – as it was felt that the order of the elements and combination of black and yellow offered the best visibility and legibility, and were commonly associated with warning signs. These designs were then visualised across the other core shapes indicated in Section 6.1.1, to illustrate how each design would work in different shape formats (landscape, portrait, square etc). At this stage, six alternative combined health warning messages were also shown, as well as multiple language versions and the layout for the FRONT of flip-top cigarette packs.

The two options were then developed to illustrate how the design would appear across different pack formats, using different combined health warning messages (and associated images), different languages and introducing symbols to the cessation information panels, so that a decision could be on the preferred solution from which the Technical Specifications could be established for WP3 (and on which the Guidelines document would be based in WP4).

6.3.1 Preferred design 1 (option 12)

Flip-top cigarette pack (BACKS)



Illustrated across the core set of 6 shapes (as described in Section 6.1.1)



Illustrating different combined health warnings and languages



6.3.2 Preferred design 2 (option 13)

Flip-top cigarette pack (BACKS)



Illustrated across the core set of 6 shapes (as described in Section 6.1.1)



Illustrating different combined health warnings and languages



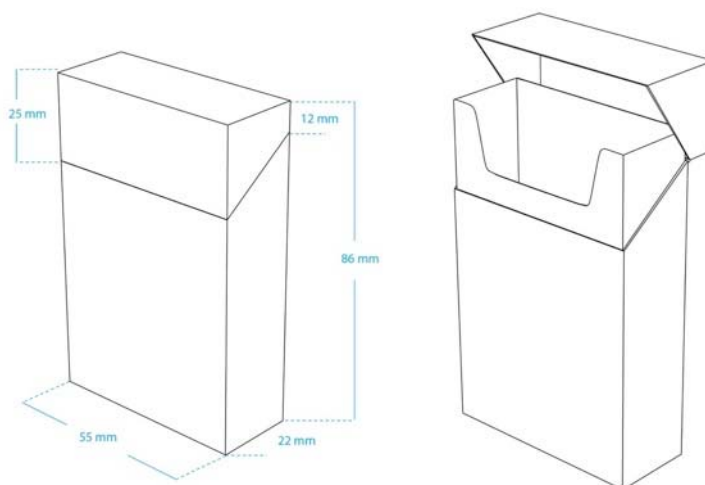
7. Finalised design for combined health warnings

Following further consultation with the wider consortium advisory board, tobacco control experts and the Commission, Option 12 (with the black warning panel and white text) was selected as the approved design for implementation across the set of 25 most common and representative packs.

7.1. Layout of combined health warning on the front of flip-top cigarette packs

The TPD allows for the combined health warnings on flip-top cigarette packs to be split in such a way that the graphical integrity of the text and image is preserved when they are opened, though on all other pack formats, the health warnings must remain intact.

From the sample packs supplied during the audit in WP1, it appears that whereas the width and height of flip-top packs (that will be allowable under TPD II) vary significantly, the depth of the lid is fairly consistent, generally around 25mm.



It was therefore decided that in the case of combined health warnings on the FRONT of flip-top cigarette packs, the layout of the image, warning message and cessation information would be arranged differently other pack formats (including the BACK of flip-top packs), so that no part of the combined health warning is distorted when the pack is opened.

Three different solutions were considered, in order to find a solution that worked across all flip-top cigarette packs – standard, wide, rounded corner, bevelled corner etc.

7.1.1 Option 1 (front of pack)

Image moved from top of warning, to bottom, but message and cessation information stay together, with yellow panel below the black panel.

✓ Proportion/size of image, message and cessation information remains similar to warning on back of pack.

✓/✗ Message remains at a good size on all packs, however yellow panel will need to be placed below lid on tall packs.

✗ cessation information splits the image part of the warning from the message.



7.1.2 Option 2 (front of pack)

Yellow panel positioned above the message; cessation information and message always fit to lid area.

- ✓ Cessation information doesn't split the warning image and message.
- ✗ Proportion/size of elements differs from back of pack and message becomes quite small.



7.1.3 Option 3 (front of pack)

Yellow panel moved to bottom of warning, as per the back of pack; message utilises lid area.

- ✓ Proportion/size of image, message and cessation information remains similar to warning on back of pack.
- ✗ However, on wide packs, the warning will need to be in a narrower format (so not touching edges of the pack), to avoid the image becoming too shallow.

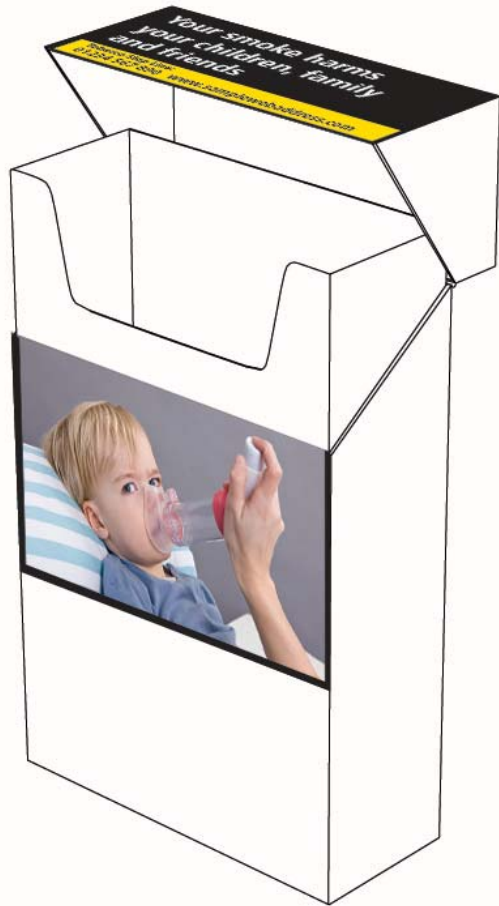


Of these layouts, Option 1 was felt to be the preferred design, because it retained similar proportions to the warning on the back of pack, but still allowing for the warnings to fit the full pack width.

7.2. Placement of combined health warnings on the 25 most common or representative packs

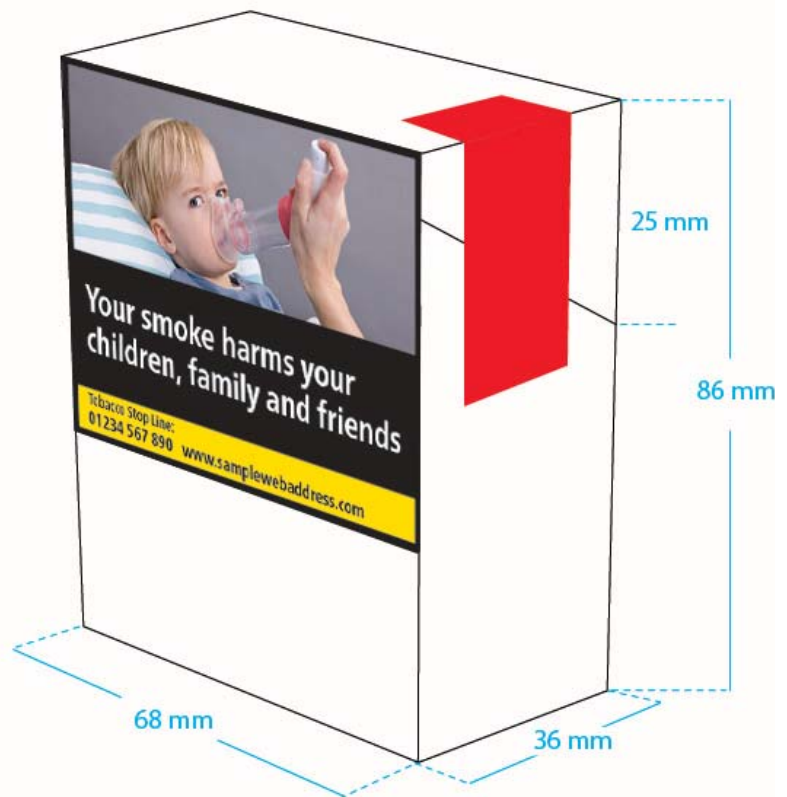
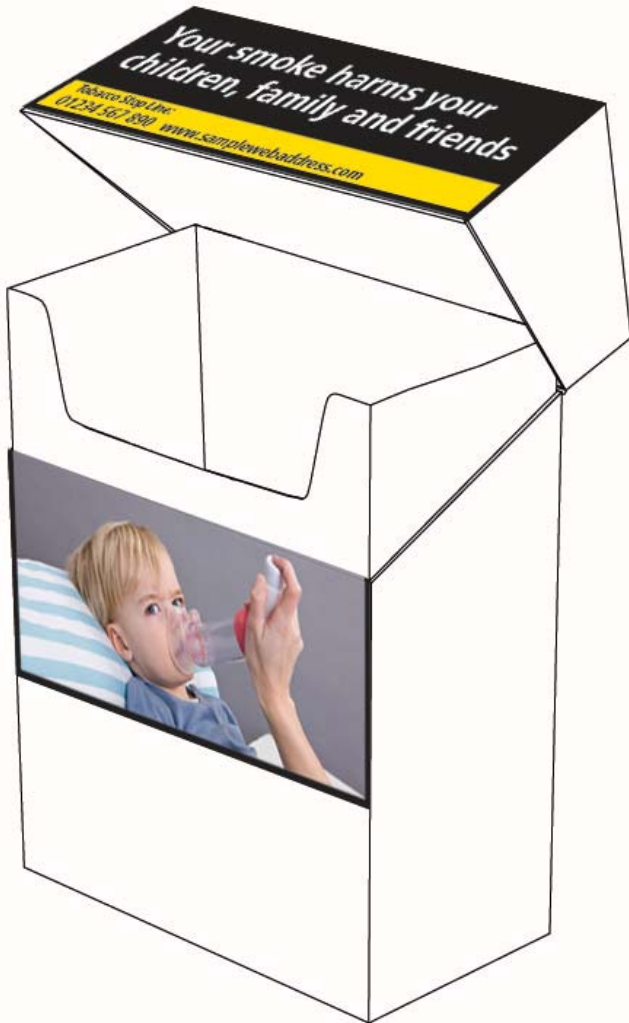
The following pages show graphical representations of the final design for combined health warnings (with increased image size), shown as 3D visuals positioned on each of the 25 pack formats, and covering 65% of the front and back surface (as described in Section 5.2).

7.2.1 Cigarettes – Type 1: Flip top box, square corners (standard)



Cigarettes – Type 1: Flip top box, square corners (standard)		
Size (65% of surface area) & placement of combined health warning	Size* (W) 55mm x (H) 55.9mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to top of pack and full width of pack
Considerations & implications	Different layout used for combined health warning on front of pack, so that image doesn't split when pack is opened. Tax Stamp will need to be repositioned so that it doesn't interfere with the warning.	

7.2.2 Cigarettes – Type 2: Flip top box, square corners (wide, deep pack)



Cigarettes – Type 2: Flip top box, square corners (wide, deep pack)			
Surface areas calculated	65% of front and back surfaces		
Size (65% of surface area) & placement of combined health warning	<table border="1" style="width: 100%;"> <tr> <td>Size* (W) 68mm x (H) 55.9mm <i>*Dimensions have been slightly rounded in some cases</i></td> <td>Position Aligned to top of pack and full width of pack</td> </tr> </table>	Size* (W) 68mm x (H) 55.9mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to top of pack and full width of pack
Size* (W) 68mm x (H) 55.9mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to top of pack and full width of pack		
Considerations & implications	<p>Different layout used for combined health warning on front of pack, so that image doesn't split when pack is opened.</p> <p>Tax Stamp will need to be repositioned so that it doesn't interfere with the warning.</p>		

7.2.3 Cigarettes – Type 3: Flip top box, bevel corner/octagonal (tall pack)



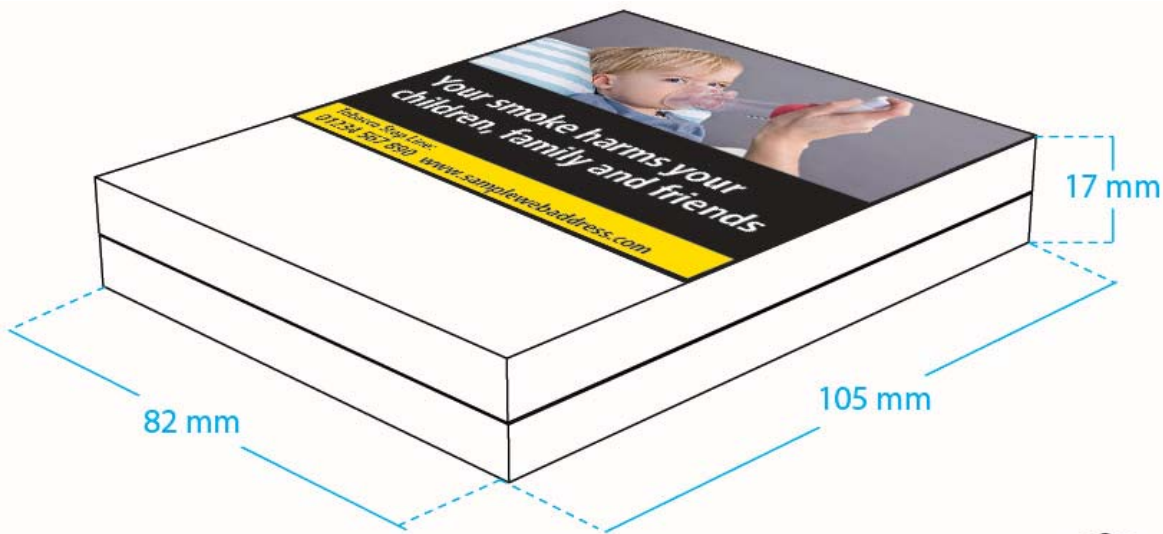
Cigarettes – Type 3: Flip top box, bevel corner/octagonal (tall pack)	
Surface areas calculated	65% of front and back surfaces (calculated as if the pack has square edges)
Size (65% of surface area) & placement of combined health warning	<p>Size* (W) 52mm x (H) 75.225mm <i>*Dimensions have been slightly rounded in some cases</i></p> <p>Position Aligned to top of pack and full width of flat surface, without extending around the bevelled edge</p>
Considerations & implications	<p>Different layout used for combined health warning on front of pack, so that image doesn't split when pack is opened; for taller warnings, yellow panel sits below, rather than on, the lid to allow for larger message.</p> <p>Some packs may need to be modified to allow for a warning of minimum 52mm wide to be positioned on the flat surface, without extending around the bevelled edge.</p> <p>Tax Stamp will need to be repositioned so that it doesn't interfere with the warning. Many Tax Stamps may also have to be resized to fit the side of pack.</p>

7.2.4 Cigarettes – Type 4: Flip top box, rounded corner



Cigarettes – Type 4: Flip top box, rounded corner		
Surface areas calculated	65% of front and back surfaces (calculated as if the pack has square edges)	
Size (65% of surface area) & placement of combined health warning	<p>Size* (W) 58mm x (H) 63.61mm</p> <p><i>*Dimensions have been slightly rounded in some cases</i></p>	<p>Position Aligned to top of pack and full width of flat surface, without extending around the rounded edge</p>
Considerations & implications	<p>Different layout used for combined health warning on front of pack, so that image doesn't split when pack is opened; for taller warnings, yellow panel sits below, rather than on, the lid to allow for larger message.</p> <p>Tax Stamp will need to be repositioned so that it doesn't interfere with the warning. Many Tax Stamps may also have to be resized to fit the side of pack.</p>	

7.2.5 Cigarettes – Type 5:
Shoulder hinged box (rectangular)



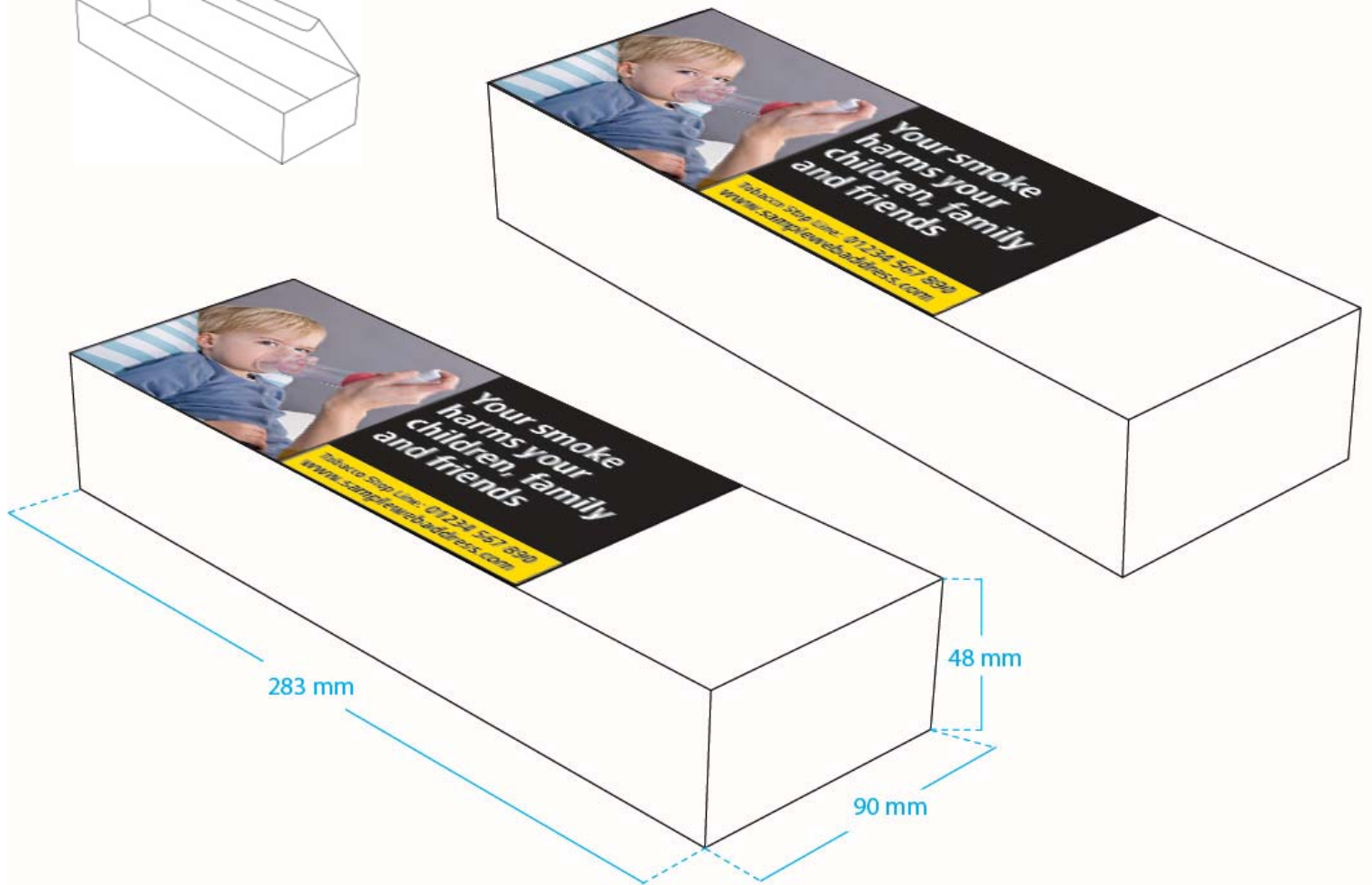
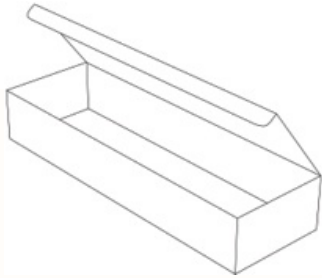
Cigarettes – Type 5: Shoulder hinged box (rectangular)		
Surface areas calculated	65% of front and back surfaces	
Size (65% of surface area) & placement of combined health warning	Size* (W) 82mm x (H) 68.3mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to shoulder of pack and full width of pack.
Considerations & implications	Tax Stamp will need to be repositioned so that it doesn't interfere with the warning.	

7.2.6 Cigarettes – Type 6: Soft pack



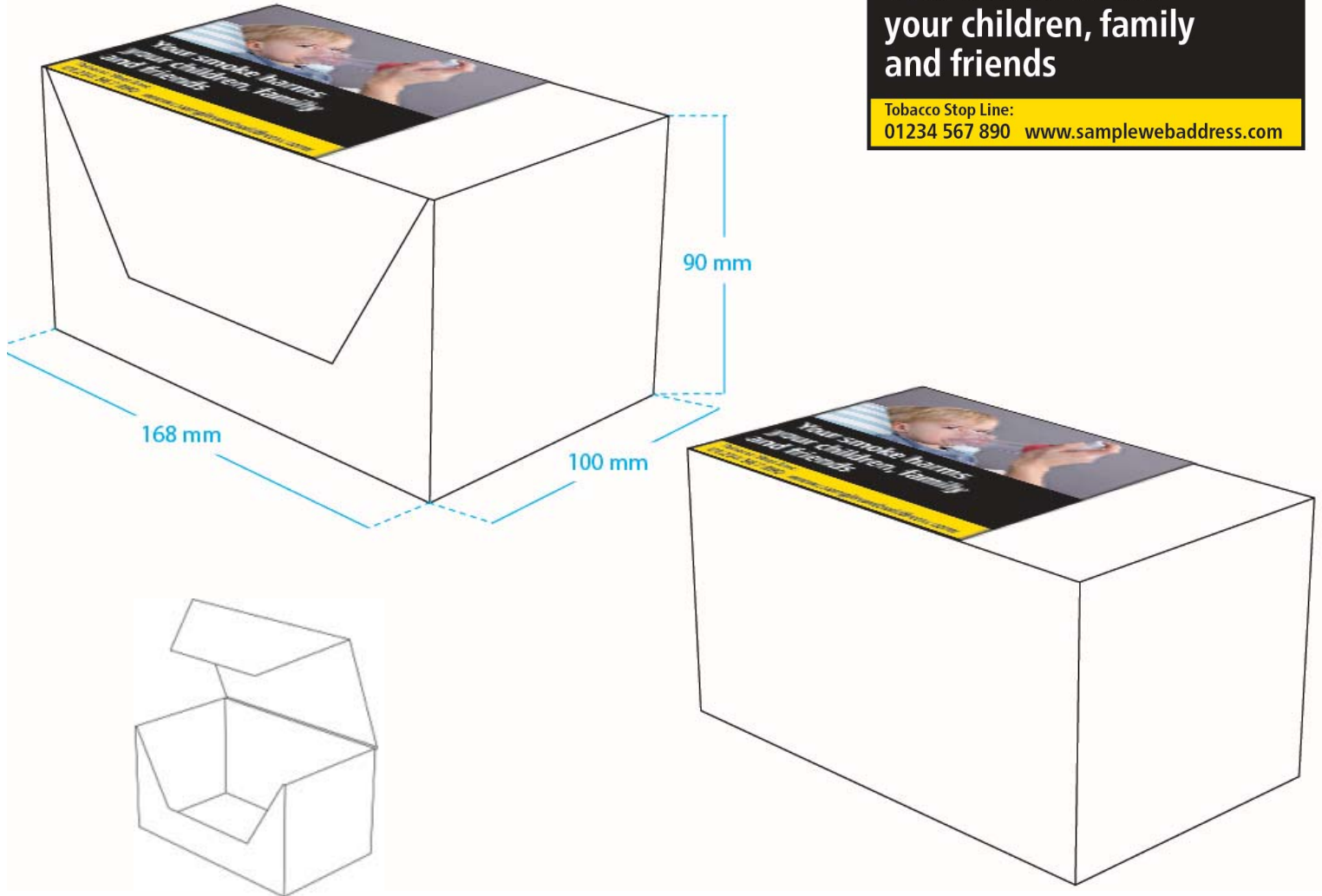
Cigarettes – Type 6: Soft pack		
Surface areas calculated	65% of front and back surfaces	
Size (65% of surface area) & placement of combined health warning	Size* (W) 52mm x (H) 54.6mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to top of pack and full width of pack
Considerations & implications	Banderole sticker will need to become either a) clear/unprinted plastic so that it doesn't interfere with the warning or b) affixed to inner aluminium layer, with the outer soft card layer attached using glue dots. Tax Stamp can no longer be used in place of a banderole and will need to be repositioned so that it doesn't interfere with the warning. Many Tax Stamps may also have to be resized to fit the side of pack and new machinery may be required for application, due to the flexibility of soft packs.	

7.2.7 Cigarettes – Type 7:
Outer packaging
(flip top unit multi pack)



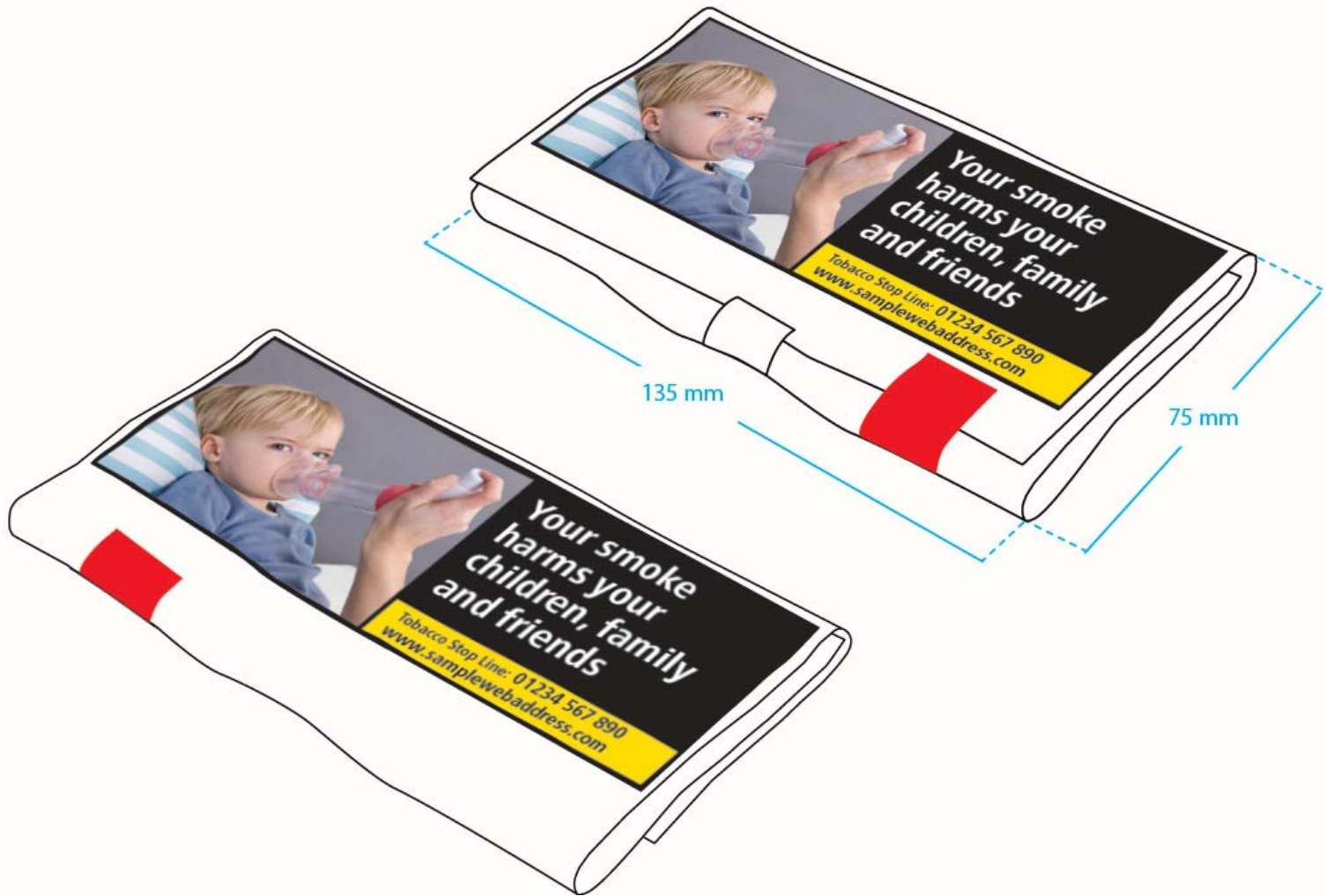
Cigarettes – Type 7: Outer packaging (flip top unit multi pack)		
Surface areas calculated	65% of front and back surfaces; front and back surfaces defined as the larger top/bottom surfaces	
Size (65% of surface area) & placement of combined health warning	Size* (W) 184mm x (H) 90mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to top hinge of pack and left edge.
Considerations & implications	No issues foreseen.	

7.2.8 Cigarettes – Type 8:
Outer packaging
(shoulder hinge unit multi pack)



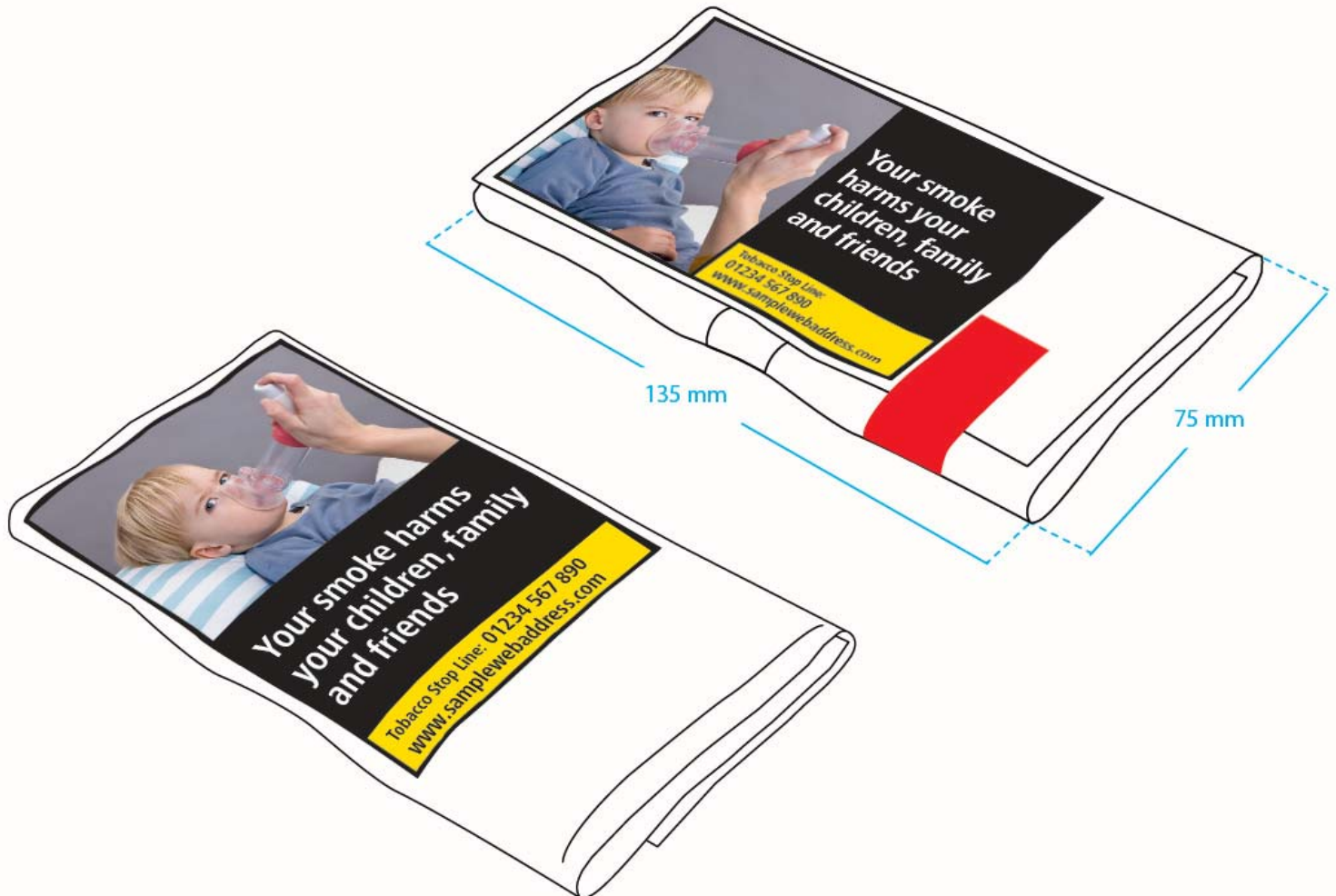
Cigarettes – Type 8: Outer packaging (shoulder hinge unit multi pack)		
Surface areas calculated	65% of front and back surfaces; front and back surfaces defined as the larger top/bottom surfaces that won't be split when opened	
Size (65% of surface area) & placement of combined health warning	Size* (W) 109mm x (H) 100mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to top hinge of pack and left edge.
Considerations & implications	No issues foreseen.	

7.2.9 RYO – Type 1: Pouch with flap, flat/roll/wrap-around (non-gusset) (OPTION A)



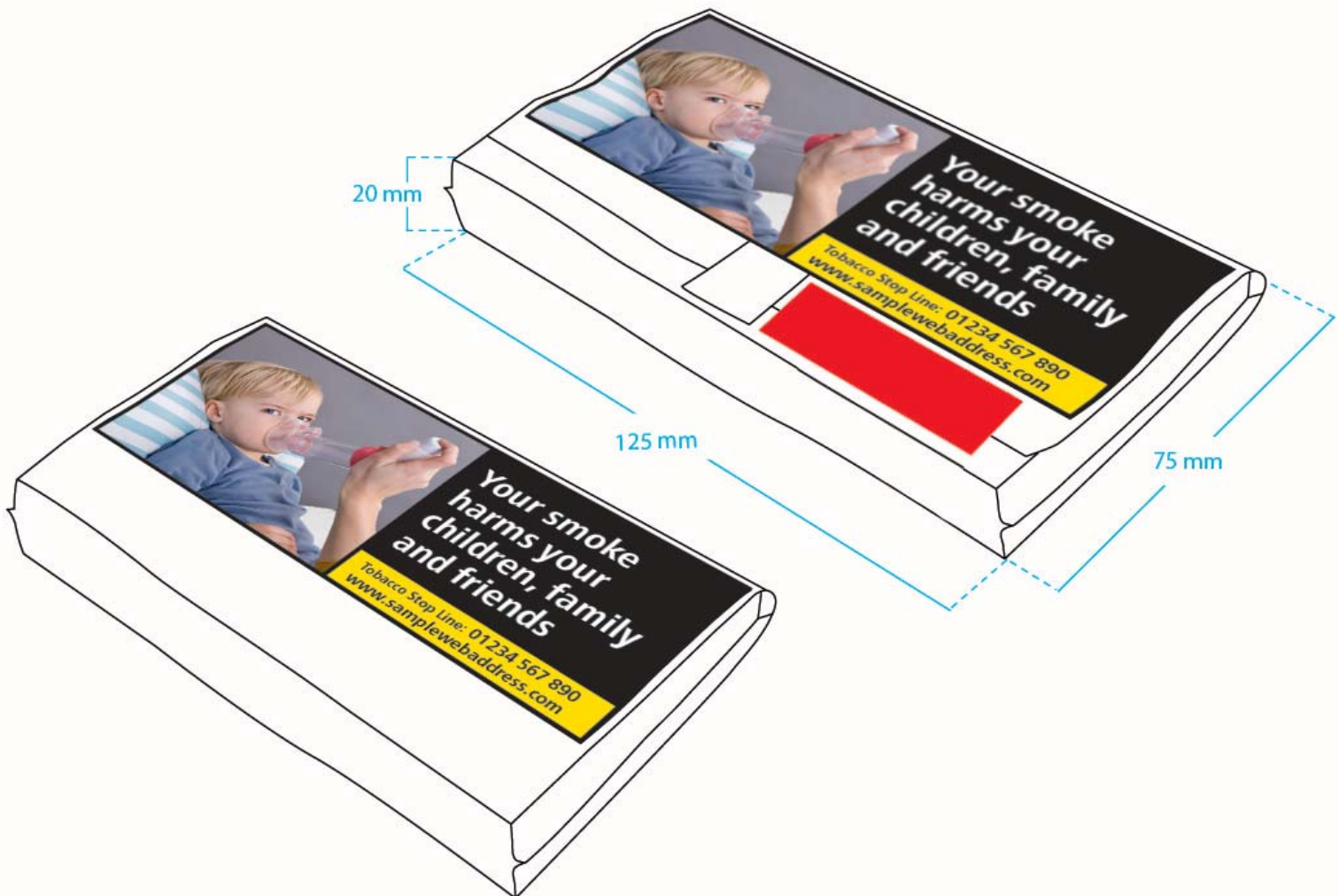
RYO – Type 1: Pouch with flap, flat/roll/wrap-around (non-gusset) (OPTION A)			
Surface areas calculated	65% of front and back surfaces (when pouch closed)		
Size (65% of surface area) & placement of combined health warning	<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">Size* (W) 128mm x (H) 51.5mm <i>*Dimensions have been slightly rounded in some cases</i></td> <td style="width: 50%;">Position Aligned to top and full width of pouch, but allowing for print tolerances at edges</td> </tr> </table>	Size* (W) 128mm x (H) 51.5mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to top and full width of pouch, but allowing for print tolerances at edges
Size* (W) 128mm x (H) 51.5mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to top and full width of pouch, but allowing for print tolerances at edges		
Considerations & implications	<p>Expected that flap will need to be extended to allow for a warning equivalent in size to 65% of full surface.</p> <p>Tax Stamps may need to be repositioned so they don't interfere with the warning and may require changes to machinery for application around the curve.</p> <p>Paper-laminate pouches (and those printed in Flexography) may not provide good enough print quality for the images.</p>		

7.2.10 RYO – Type 1: Pouch with flap, flat/roll/wrap-around (non-gusset) (OPTION B)



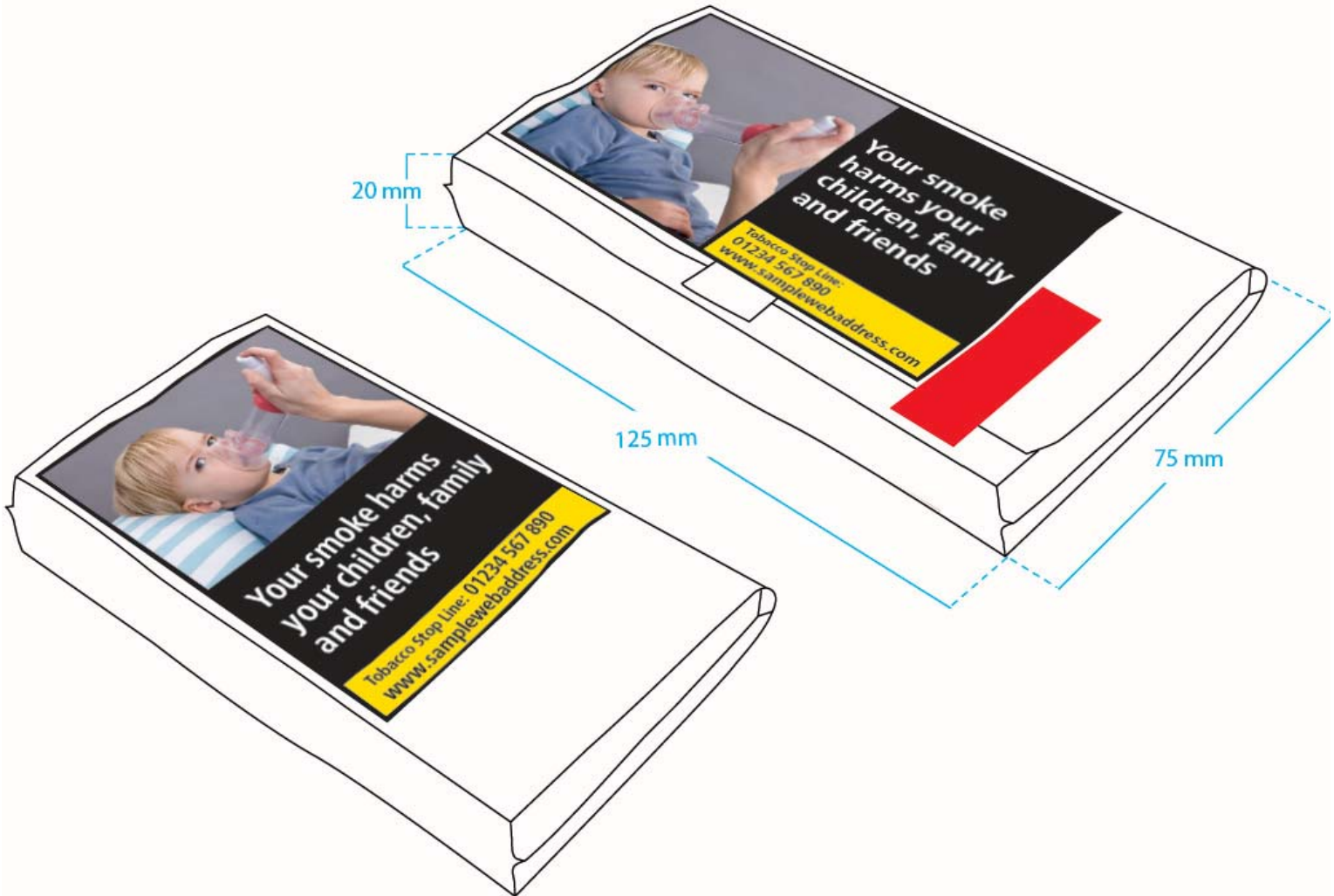
RYO – Type 2: Pouch with flap, flat/roll/wrap-around (non-gusset) (OPTION B)			
Surface areas calculated	65% of front and back surfaces (when pouch closed)		
Size (65% of surface area) & placement of combined health warning	<table border="1"> <tr> <td>Size* Flat face: (W) 70mm x (H) 94mm Opening side: (W) 102mm x (H) 64.5mm <i>*Dimensions have been slightly rounded in some cases</i></td> <td>Position Aligned to top and left edge of pouch, but allowing for print tolerances at edges; CHW orientated to follow same direction as branding</td> </tr> </table>	Size* Flat face: (W) 70mm x (H) 94mm Opening side: (W) 102mm x (H) 64.5mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to top and left edge of pouch, but allowing for print tolerances at edges; CHW orientated to follow same direction as branding
Size* Flat face: (W) 70mm x (H) 94mm Opening side: (W) 102mm x (H) 64.5mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to top and left edge of pouch, but allowing for print tolerances at edges; CHW orientated to follow same direction as branding		
Considerations & implications	<p>Expected that flap will need to be extended to allow for a warning equivalent in size to 65% of full surface.</p> <p>Warnings illustrated in different orientations on each face, to show how warnings would look dependent on orientation of branding.</p> <p>Tax Stamps may need to be repositioned so they don't interfere with the warning and may require changes to machinery for application.</p> <p>Paper-laminate pouches (and those printed in Flexography) may not provide good enough print quality for the images.</p>		

7.2.11 RYO – Type 2: Pouch with flap, block bottom/side folded (OPTION A)



RYO – Type 2: Pouch with flap, block bottom/side folded (OPTION A)			
Surface areas calculated	65% of front and back surfaces (when pouch closed)		
Size (65% of surface area) & placement of combined health warning	<table border="0"> <tr> <td>Size* (W) 118mm x (H) 51.6mm <i>*Dimensions have been slightly rounded in some cases</i></td> <td>Position Aligned to top and full width of pouch, but allowing for print tolerances at edges</td> </tr> </table>	Size* (W) 118mm x (H) 51.6mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to top and full width of pouch, but allowing for print tolerances at edges
Size* (W) 118mm x (H) 51.6mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to top and full width of pouch, but allowing for print tolerances at edges		
Considerations & implications	<p>Flap may need to be extended to allow for the placement of a Tax Stamp.</p> <p>Tax Stamps may need to be repositioned so they don't interfere with the warning and may require changes to machinery for application around the curve.</p>		

7.2.12 RYO – Type 2: Pouch with flap, block bottom/side folded (OPTION B)



RYO – Type 2: Pouch with flap, block bottom/side folded (OPTION B)	
Surface areas calculated	65% of front and back surfaces (when pouch closed)
Size (65% of surface area) & placement of combined health warning	<p>Size* Flat face: (W) 68mm x (H) 89.6mm Opening side: (W) 96.5mm x (H) 63mm <i>*Dimensions have been slightly rounded in some cases</i></p> <p>Position Aligned to top and left edge of pouch, but allowing for print tolerances at edges; CHW orientated to follow same direction as branding</p>
Considerations & implications	<p>Flap may need to be extended to allow for the placement of a Tax Stamp.</p> <p>Warnings illustrated in different orientations on each face, to show how warnings would look dependent on orientation of branding.</p> <p>Tax Stamps may need to be repositioned so they don't interfere with the warning and may require changes to machinery for application around the curve.</p>

7.2.13 RYO – Type 3:
Standing pouch/Zip bag



RYO – Type 3: Standing pouch/Zip bag	
Surface areas calculated	65% of front and back surfaces (after the disposable tear strip has been removed)
Size (65% of surface area) & placement of combined health warning	<p>Size* Front: (W) 165mm x (H) 164mm Back (Tax Stamp): (W) 138mm x (H) 196mm <i>*Dimensions have been slightly rounded in some cases</i></p> <p>Position Aligned to slightly below tear line, so warning not damaged when pouch opened; front warning aligned to full width of bag, but allowing for print tolerances at edges; back warning aligned to left side to allow for Tax Stamp</p>
Considerations & implications	<p>Different proportions of warning will be required on front versus back surfaces in regions which require a Tax Stamp.</p> <p>Flexography printing may not provide good enough print quality for the images.</p>

7.2.14 RYO – Type 4:
Cylinder, card (medium)



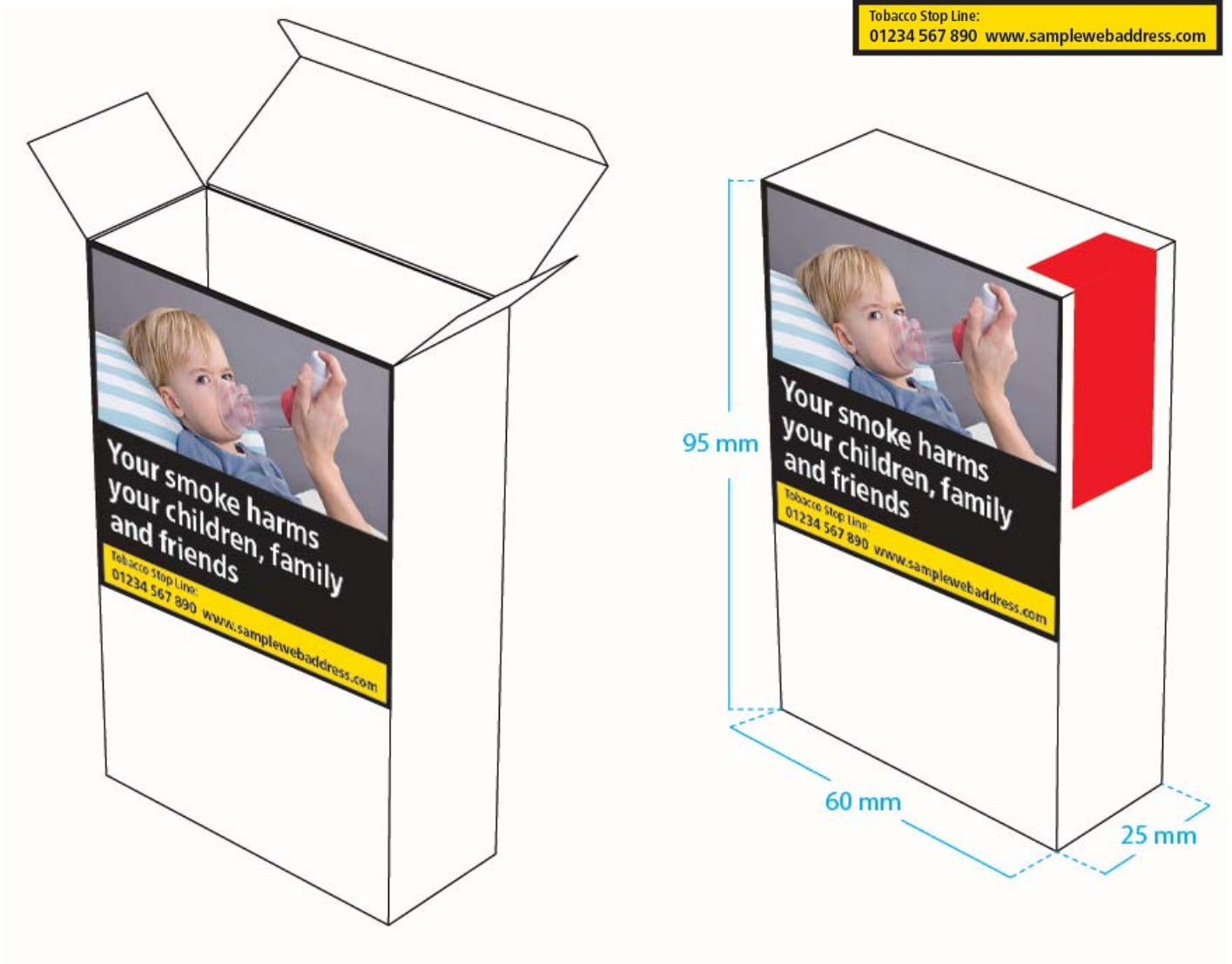
RYO – Type 4: Cylinder, card (medium)		
Surface areas calculated	65% of front and back surfaces; each surface is calculated as half the circumference of the cylinder, including the area covered by the lip of the lid when positioned on pack	
Size (65% of surface area) & placement of combined health warning	Size* (W) 130mm x (H) 102mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to the base of the lid; warnings positioned equidistant from each other
Considerations & implications	Proportions of warnings calculated to allow for the positioning of a Tax Stamp and to ensure full visibility when viewed from front or back. Some machinery may need to be upgraded to allow for the accurate positioning of Tax Stamps (though allowing for machine tolerances), since random application may mean the warning is interrupted.	

7.2.15 RYO – Type 5:
Cylindrical bucket



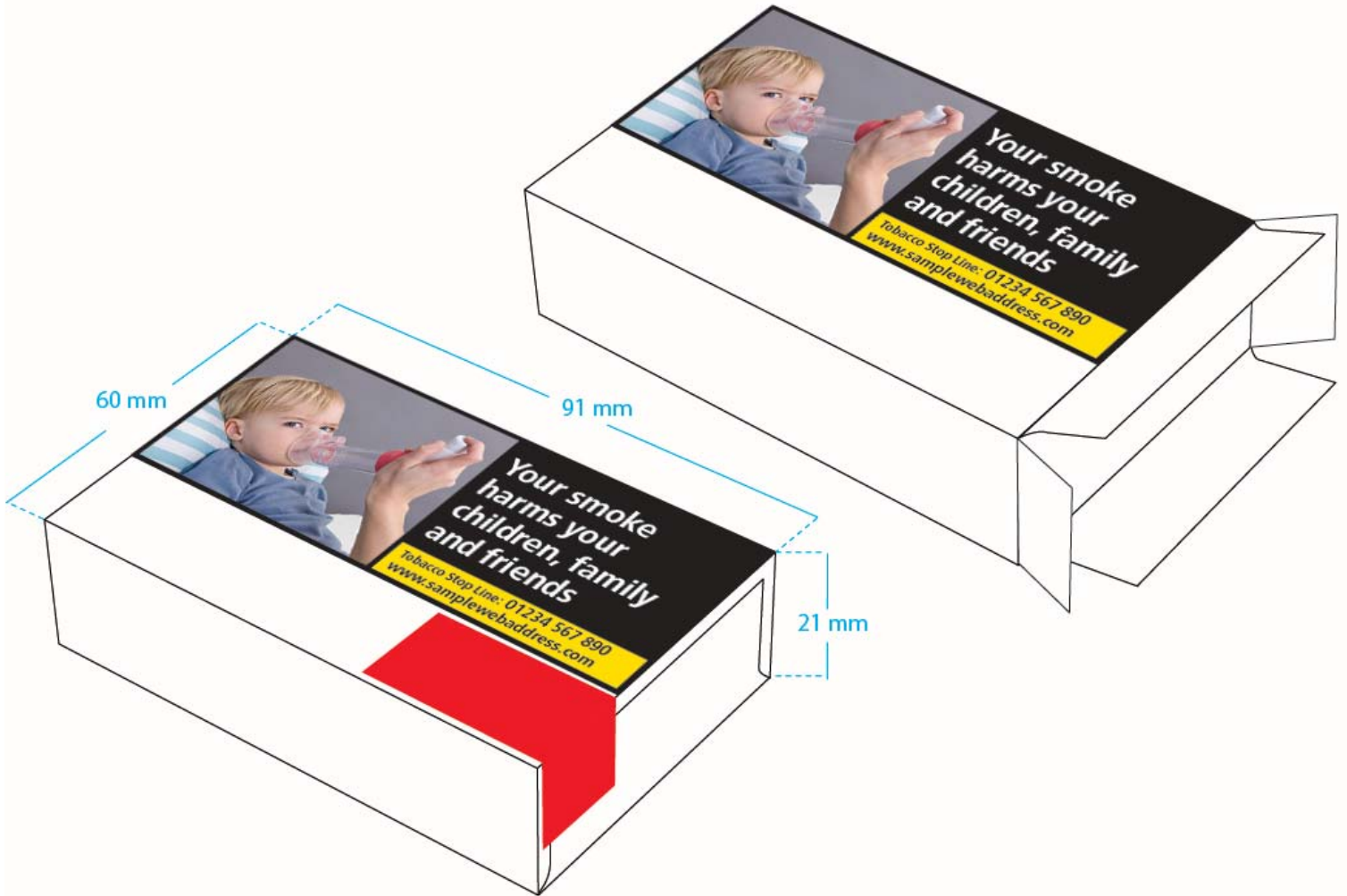
RYO – Type 5: Cylindrical bucket	
Surface areas calculated	65% of front and back surfaces; each surface is calculated as half the circumference of the bucket, not including the protruding 'lip' of the pack
Size (65% of surface area) & placement of combined health warning	<p>Size* (W) 260mm x (H) 125mm <i>*Dimensions have been slightly rounded in some cases</i></p> <p>Position Aligned to the protruding 'lip' of the bucket; warnings positioned equidistant from each other</p>
Considerations & implications	Proportions of warnings calculated to ensure full visibility when viewed from front or back.

7.2.16 Waterpipe – Type 1: Carton box (portrait, tuck-top)



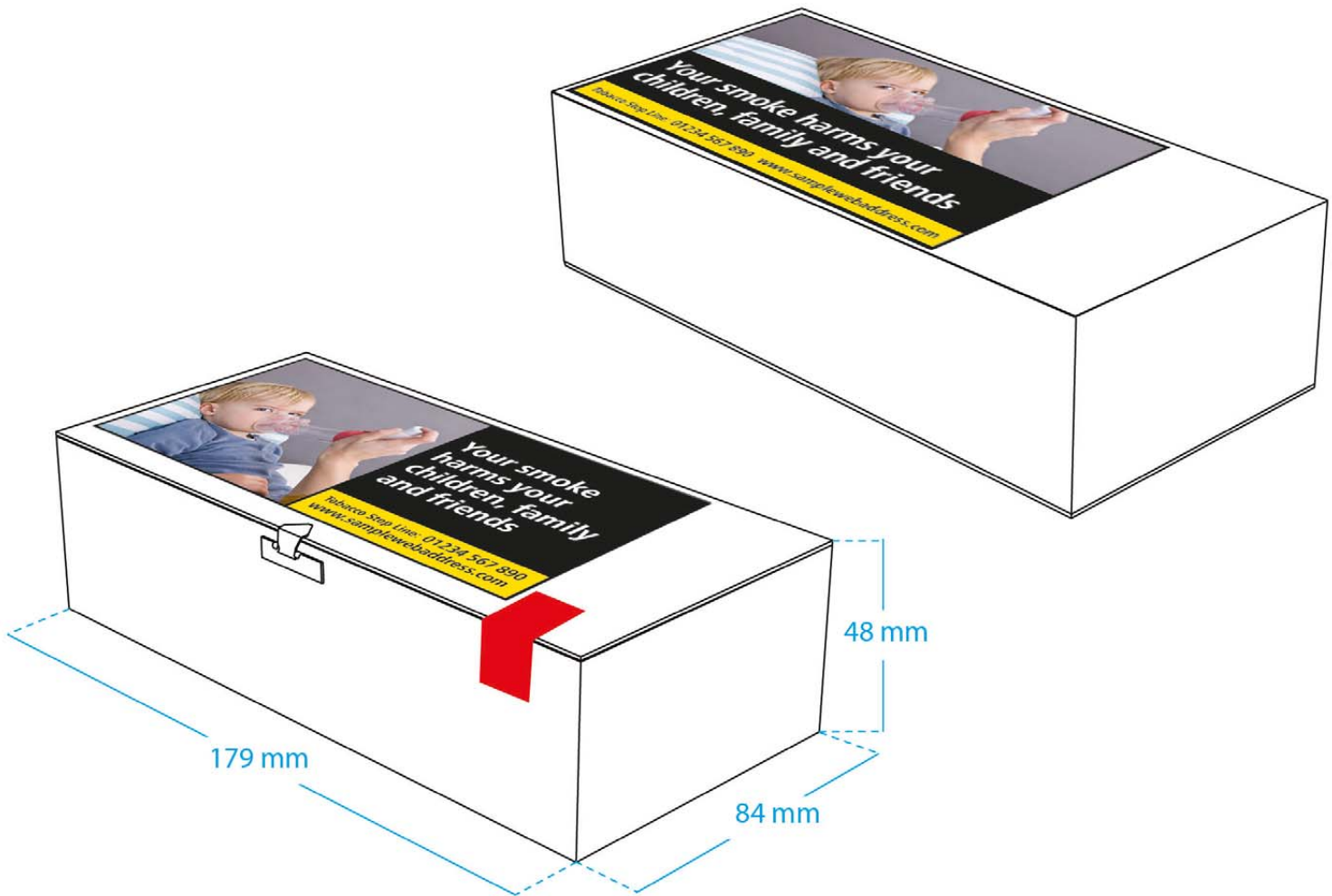
Waterpipe – Type 1: Carton box (portrait, tuck-top)	
Surface areas calculated	65% of front and back surfaces
Size (65% of surface area) & placement of combined health warning	<p>Size* (W) 60mm x (H) 61.75mm</p> <p><i>*Dimensions have been slightly rounded in some cases</i></p> <p>Position Aligned to top edge and full width of pack.</p>
Considerations & implications	Tax Stamp may need to be repositioned so that it doesn't interfere with the warning, however many Tax Stamps may also have to be resized to fit the side of pack.

7.2.17 Waterpipe – Type 2:
Carton box (landscape)



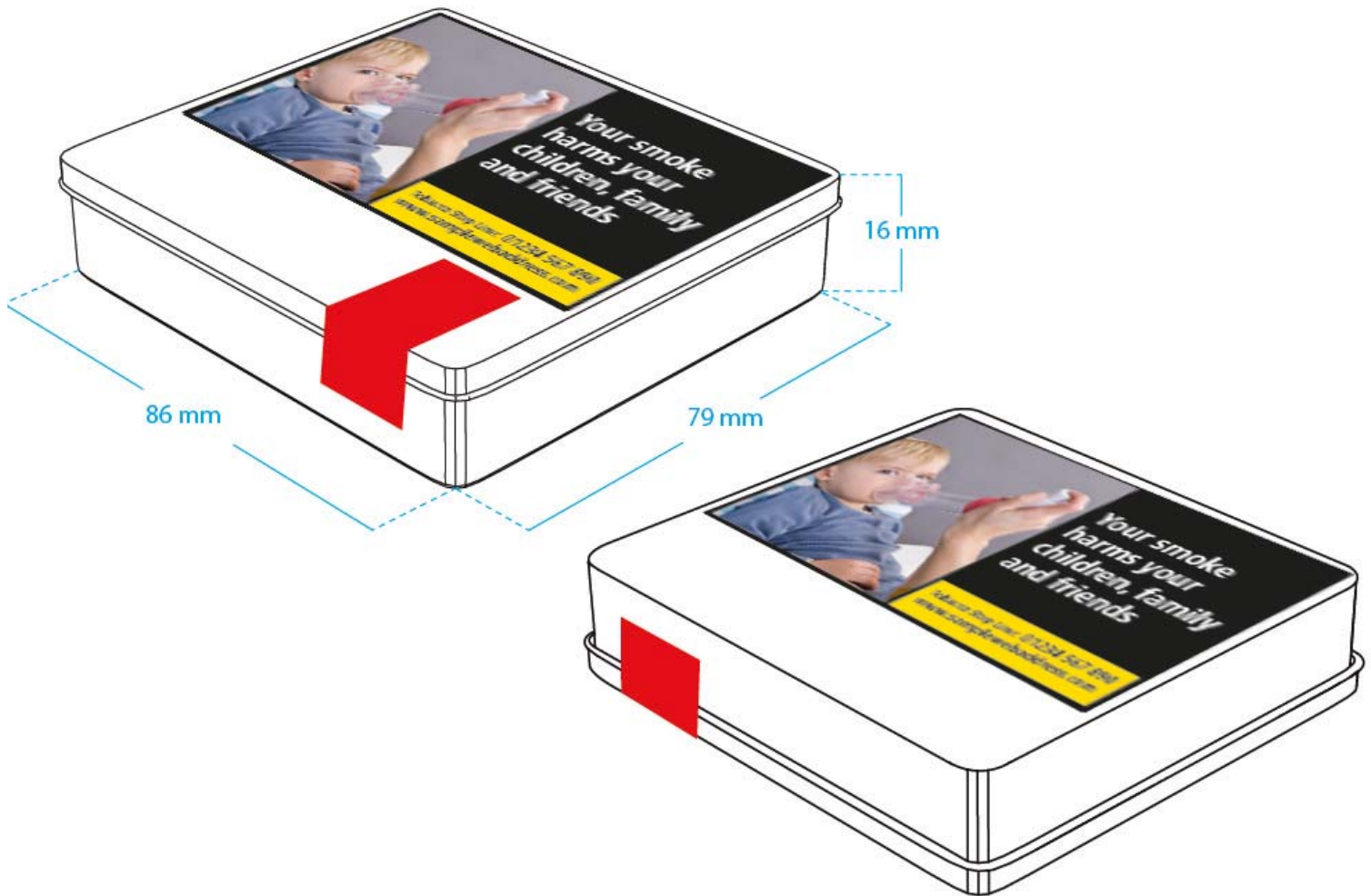
Waterpipe – Type 2: Carton box (landscape)		
Surface areas calculated	65% of front and back surfaces; front and back surfaces defined as the larger top/bottom surfaces	
Size (65% of surface area) & placement of combined health warning	Size* (W) 91mm x (H) 39mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to top edge and full width of pack.
Considerations & implications	Tax Stamp may need to be repositioned so that it doesn't interfere with the warning, however many Tax Stamps may also have to be resized to fit pack.	

7.2.18 Other – Type 1: Hinged box, wood (cigar; cigarillo)



Other – Type 1: Hinged box, wood (cigar; cigarillo)	
Surface areas calculated	65% of front and back surfaces; front and back surfaces defined as the larger top/bottom surfaces
Size (65% of surface area) & placement of combined health warning	<p>Size* Front (clasp): (W) 134mm x (H) 73mm Back: (W)122mm x (H) 80mm <i>*Dimensions have been slightly rounded in some cases</i></p> <p>Position Aligned to top hinged edge and left edge, but allowing for print tolerances/label application tolerances at edges and metal clasp</p>
Considerations & implications	<p>Warning will need to be affixed by irremovable sticker on wooden boxes, however 'bubbling' may occur on very large selection boxes.</p> <p>For substrates where warnings can be pre-printed, there may be cost implications, due to small volumes per country/language.</p>

7.2.19 Other – Type 1: Hinged box, tin, square (cigarillo; pipe)



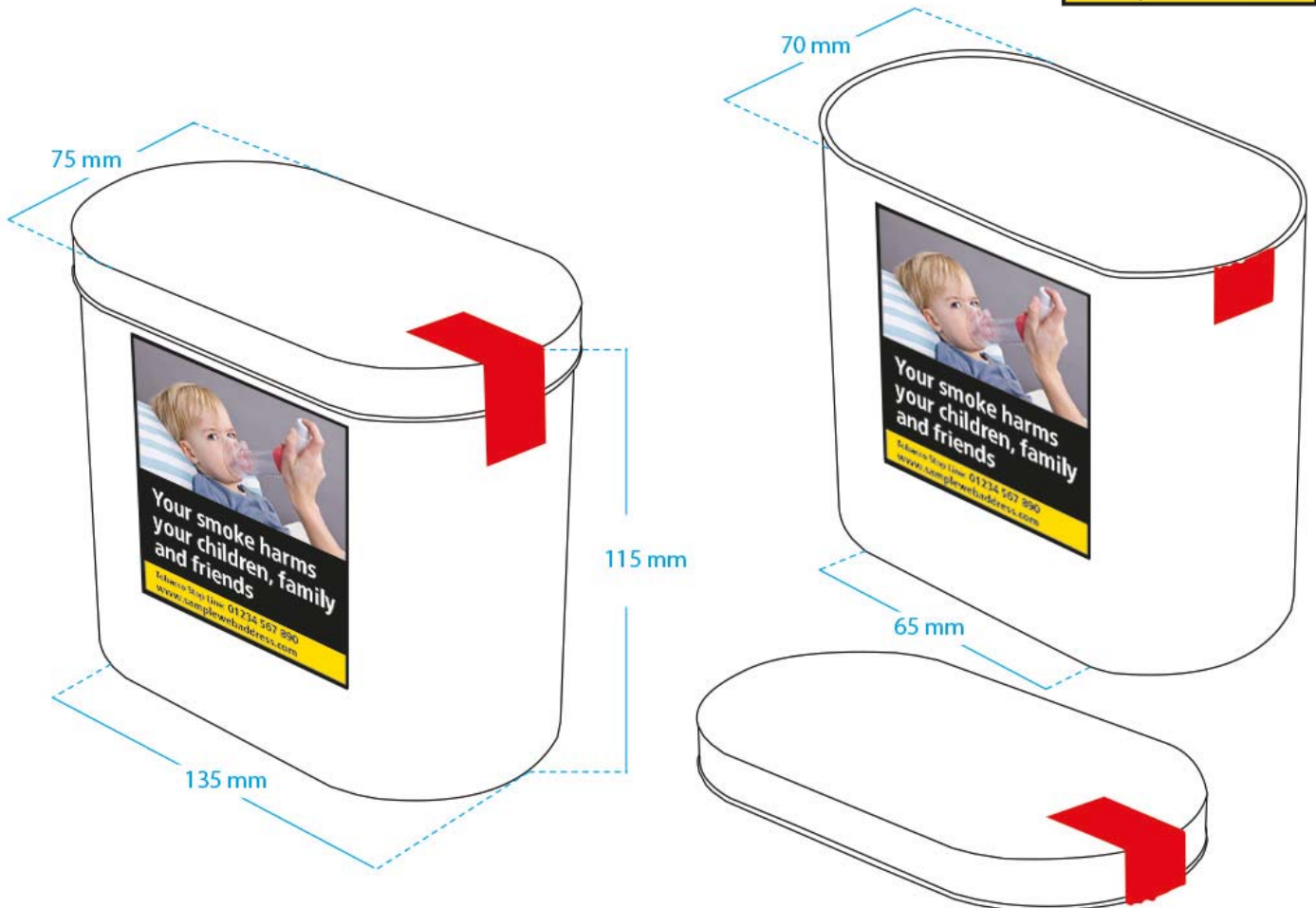
Other – Type 2: Hinged box, tin, square (cigarillo; pipe)		
Surface areas calculated	65% of front and back surfaces; front and back surfaces defined as the larger top/bottom surfaces	
Size (65% of surface area) & placement of combined health warning	Size* (W) 84mm x (H) 52.5mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to top hinged edge and full width of pack, but allowing for print tolerances/label application tolerances at edges
Considerations & implications	If warnings are pre-printed, there may be cost implications, due to small volumes per country/language and reduction in number of lids formed from one sheet of tin (due to requirement for matching warnings). Application of warnings by irremovable sticker may require additional investments, due to additional processes required in production.	

7.2.20 Other – Type 3: Hinged tin, upright (cigarillo)



Other – Type 3: Hinged tin, upright (cigarillo)		
Surface areas calculated	65% of front and back surfaces (calculated as if the pack has square edges)	
Size (65% of surface area) & placement of combined health warning	<p>Size* (W) 36mm x (H) 69mm</p> <p><i>*Dimensions have been slightly rounded in some cases</i></p>	<p>Position Aligned to top on front of pack and positioned below hinge on back of pack; warning aligned to full width of pack, without extending around rounded edge</p>
Considerations & implications	<p>If warnings are pre-printed, there may be cost implications, due to small volumes per country/language.</p> <p>Application of warnings by irremovable sticker may require additional investments, due to additional processes required in production.</p>	

7.2.21 Other – Type 4: Cuboid tin, rounded corners (cigar; cigarillo)



Other – Type 4: Cuboid tin, rounded corners (cigar; cigarillo)	
Surface areas calculated	65% of front and back surfaces; each surface is calculated as half the circumference of the flat-sided cylinder, including the area covered by the lip of the lid when positioned on pack
Size (65% of surface area) & placement of combined health warning	<p>Size* (W) 65mm x (H) 74.75mm <i>*Dimensions have been slightly rounded in some cases</i></p> <p>Position Aligned to base of lid & full width of flat surface, without extending around rounded edge</p>
Considerations & implications	<p>Some machinery may need to be upgraded to allow for the accurate positioning of Tax Stamps (though allowing for machine tolerances), since random application may mean the warning is interrupted.</p> <p>If warnings are pre-printed, there may be cost implications, due to small volumes per country/language.</p> <p>Application of warnings by irremovable sticker may require additional investments, due to additional processes required in production.</p>

7.2.22 Other – Type 5: Vacuum metal tin, round (pipe)



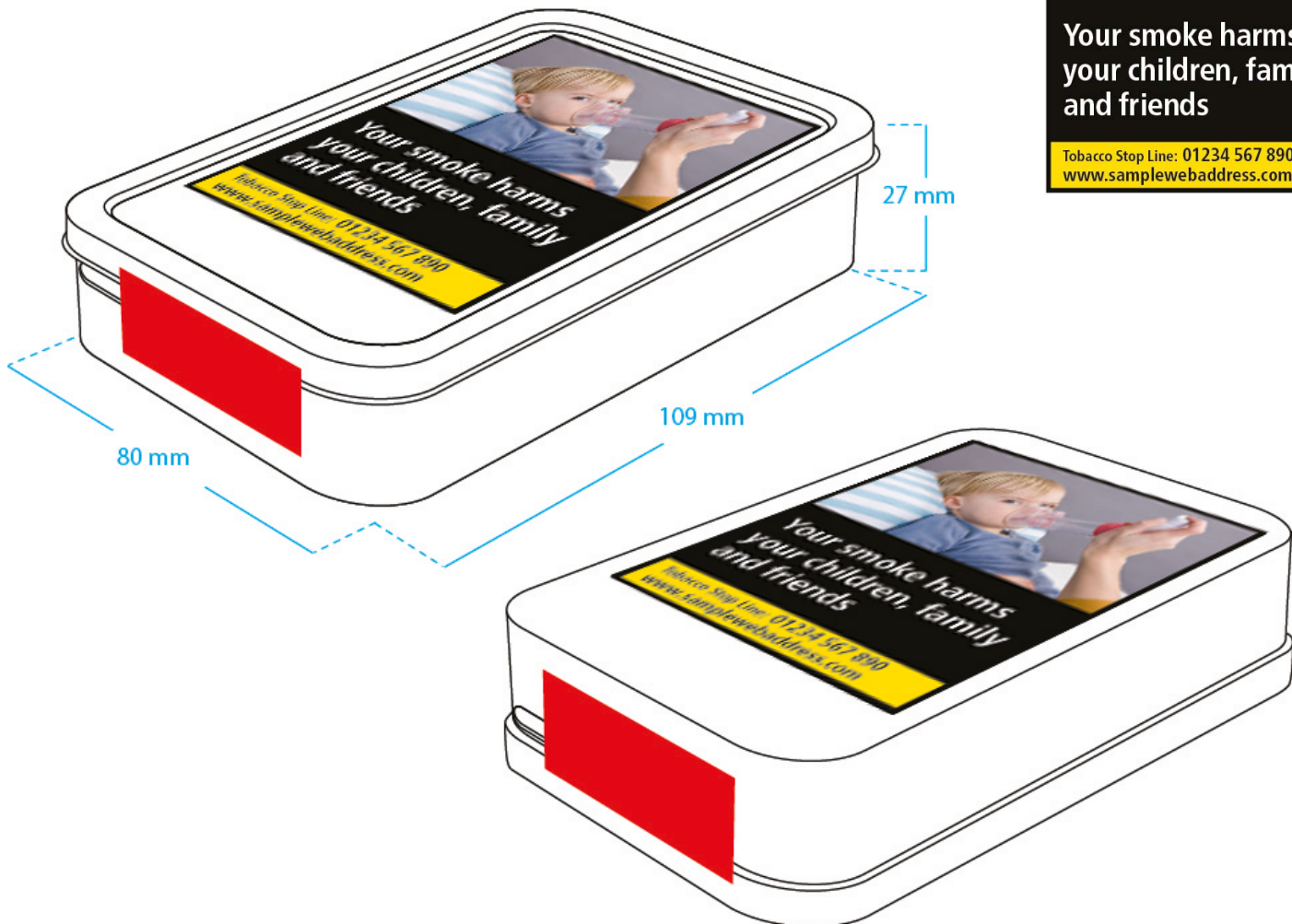
Other – Type 5: Vacuum metal tin, round (pipe)			
Surface areas calculated	65% of front and back surfaces; each surface is calculated as half the circumference of the cylinder, including the area covered by the lip of the lid when positioned on pack		
Size (65% of surface area) & placement of combined health warning	<table border="0"> <tr> <td style="vertical-align: top;"> <p>Size* (W) 162mm x (H) 30.5mm *Dimensions have been slightly rounded in some cases</p> </td> <td style="vertical-align: top;"> <p>Position Aligned to the base of the lid; warnings positioned equidistant from each other; image smaller in proportion to message area compared to other pack types, due to shape</p> </td> </tr> </table>	<p>Size* (W) 162mm x (H) 30.5mm *Dimensions have been slightly rounded in some cases</p>	<p>Position Aligned to the base of the lid; warnings positioned equidistant from each other; image smaller in proportion to message area compared to other pack types, due to shape</p>
<p>Size* (W) 162mm x (H) 30.5mm *Dimensions have been slightly rounded in some cases</p>	<p>Position Aligned to the base of the lid; warnings positioned equidistant from each other; image smaller in proportion to message area compared to other pack types, due to shape</p>		
Considerations & implications	<p>Some machinery may need to be upgraded to allow for the accurate positioning of Tax Stamps (though allowing for machine tolerances), since random application may mean the warning is interrupted.</p> <p>Not likely to be possible to pre-print warnings, due to distortion in forming process.</p> <p>Application of warnings by irremovable sticker may require additional investments, due to additional processes required in production and application tolerances could result in inaccurate placement.</p>		

7.2.23 Other – Type 6: Rectangular tin (pipe)



**Your smoke harms
your children, family
and friends**

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com



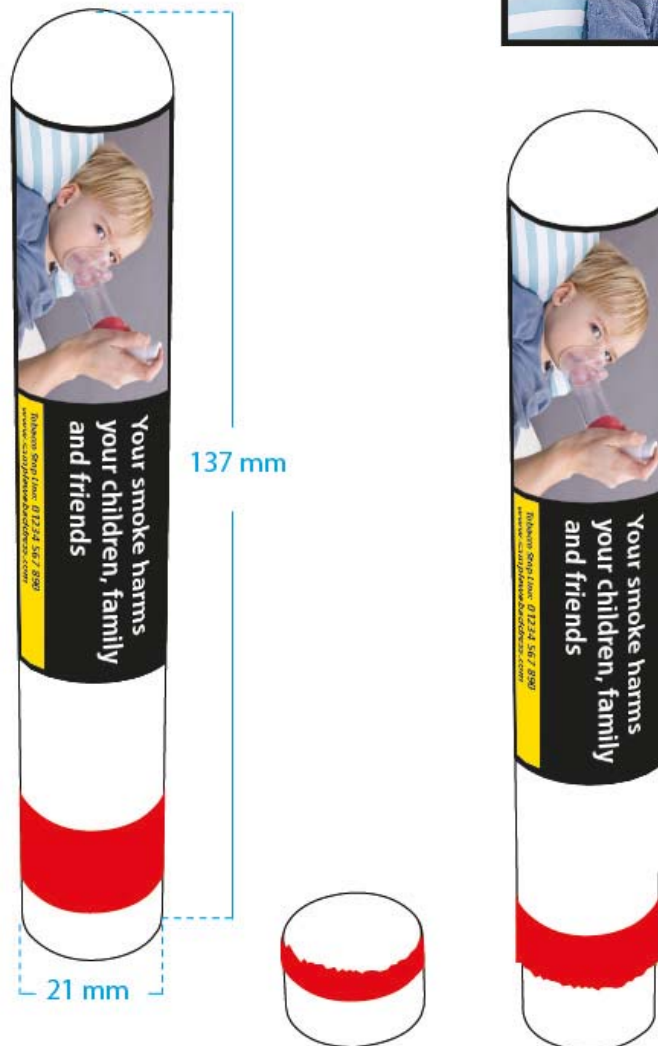
Other – Type 6: Rectangular tin (pipe)		
Surface areas calculated	65% of front and back surfaces; front and back surfaces defined as the larger top/bottom surfaces	
Size (65% of surface area) & placement of combined health warning	<p>Size* (W) 64mm x (H) 84mm</p> <p><i>*Dimensions have been slightly rounded in some cases</i></p>	<p>Position Aligned to top edge and full width of pack, but allowing for positioning on flat surface, without overlapping raised edge, as well as print tolerances/label application tolerances at edges</p>
Considerations & implications	<p>If warnings are pre-printed, there may be cost implications, due to small volumes per country/language and reduction in number of lids formed from one sheet of tin (due to requirement for matching warnings).</p> <p>Application of warnings by irremovable sticker may require additional investments, due to additional processes required in production.</p> <p>Separate lids and bases will now need to be matched for the correct language.</p>	

7.2.24 Other – Type 7: Shell & slide box, paper (cigar; cigarillo)



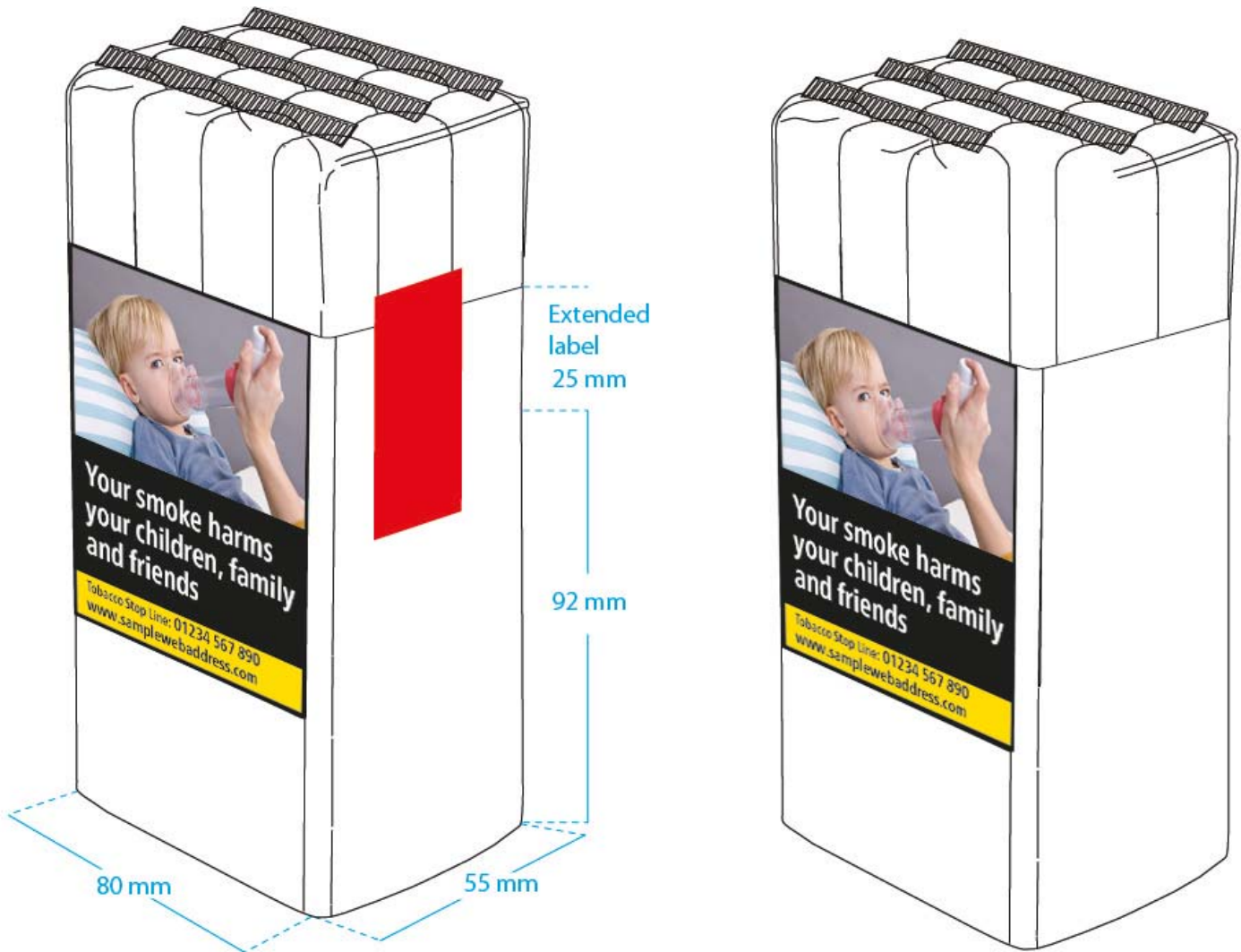
Other – Type 7: Shell & slide box, paper (cigar; cigarillo)		
Surface areas calculated	65% of front and back surfaces	
Size (65% of surface area) & placement of combined health warning	<p>Size* (W) 68mm x (H) 75.4mm</p> <p><i>*Dimensions have been slightly rounded in some cases</i></p>	<p>Position Front warning aligned to left side to allow for Tax Stamp; back warning aligned to full width of pack</p>
Considerations & implications	<p>Position of warning does not allow for existing pack window.</p> <p>Different proportions of warning will be required on front versus back surfaces in regions which require a Tax Stamp.</p> <p>Tax Stamp may need to be repositioned so that it doesn't interfere with the warning, however many Tax Stamps may also have to be resized to fit the pack.</p>	

7.2.25 Other – Type 8: Single tube, tin (cigar)



Others – Type 8: Single tube, tin (cigar)			
Surface areas calculated	65% of front and back surfaces; each surface is calculated as half the circumference of the tube, including the area covered by the lip of the lid when positioned on pack but not the rounded tip		
Size (65% of surface area) & placement of combined health warning	<table border="1"> <tr> <td>Size* (W) 88.5mm x (H) 31.5 mm <i>*Dimensions have been slightly rounded in some cases</i></td> <td>Position Aligned to the base of the rounded tube tip; due to size the warnings butt up against each other; positioned to read from top to bottom</td> </tr> </table>	Size* (W) 88.5mm x (H) 31.5 mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to the base of the rounded tube tip; due to size the warnings butt up against each other; positioned to read from top to bottom
Size* (W) 88.5mm x (H) 31.5 mm <i>*Dimensions have been slightly rounded in some cases</i>	Position Aligned to the base of the rounded tube tip; due to size the warnings butt up against each other; positioned to read from top to bottom		
Considerations & implications	<p>Some machinery may need to be upgraded to allow for the accurate positioning of Tax Stamps (though allowing for machine tolerances), since random application may mean the warning is interrupted.</p> <p>If warnings are pre-printed, there may be cost implications, due to small volumes per country/language.</p> <p>Application of warnings by irremovable sticker may require additional investments, due to additional processes required in production.</p>		

7.2.26 Other – Type 9: Bundle (cigar)



Other – Type 9: Bundle (cigar)	
Surface areas calculated	65% of front and back surfaces of card insert/label, as if it had square edges (insert/label extended to cover any branding on individual cigars)
Size (65% of surface area) & placement of combined health warning	<p>Size* (W) 70mm x (H) 87mm <i>*Dimensions have been slightly rounded in some cases</i></p> <p>Position Aligned to top of insert/label and full width of flat surface, without extending around the rounded edge</p>
Considerations & implications	Expected that card insert/label will need to be extended to hide any branding on individual cigars, so no names or logos are positioned above the warning.

7.2.27 Other – Type 10:
Multi-pack display (*cigar; cigarillo*)



Other – Type 10: Multi-pack display (<i>cigar; cigarillo</i>)	
Surface areas calculated	65% of front and back outer surfaces and 65% of front and back secondary outer surfaces (visible when used for display and outer layer peeled back and removed)
Size (65% of surface area) & placement of combined health warning	<p>Size* Outer front: (W) 71.5mm x (H) 70mm Outer back: (W) 71.5mm x (H) 70mm Secondary front: (W) 72mm x (H) 26mm Secondary back: (W) 71.5mm x (H) 70 mm</p> <p><i>*Dimensions have been slightly rounded in some cases</i></p> <p>Position Aligned to top and full width of surface; positioned on both outer layer (used in transit/wholesale) and secondary outer, visible when used as display unit in retail</p>
Considerations & implications	No foreseen issues.

8. Consistency of warning quality in reproduction

It was highlighted during stakeholder consultation that achieving a consistent quality in reproduction of warnings was extremely difficult, mainly because of the numerous different substrates used for tobacco packaging, but also due to the fact that different printers use different reprographic settings and techniques, and the machinery used.

It was suggested by some industry representatives that additional formatting could be applied across the set of 42 warning images which would help to ensure consistency in their reproduction. This may be achieved by using a generic industry standard Photoshop profile (such as the “ISO 2 coated 39L” or “ISO Coated v2 300% (ECI)” profiles) for images, as well as ensuring that files are supplied in as large a format as possible, so that they retain a minimum resolution of 300dpi even on the largest pack formats (e.g. standing pouches and assorted cigar boxes). Images should also be supplied and printed in CMYK, at a minimum of 133 lines per inch, though this is not always possible through some printing methods.

However, feedback from the industry indicated that the best way to ensure consistency and quality of the warnings across all pack types would be to provide ‘Colour Standards’ (e.g. colour proofs, printed on each different substrate) for printers to match to using their own settings, rather than just Chromalins that do not give an accurate representation of print across different types of material. This would provide a reference to the print quality that the industry will need to meet, but it would be the responsibility of the producers to choose the best way to achieve the result, in order to be compliant with the requirements of TPD II. If deemed necessary, Member States may choose to provide these at a later stage.

9. Conclusions

- Option 12 provided the strongest design solution for combined health warnings across smoked tobacco products, with the optimum hierarchy of information – 1) Image 2) Text warning 3) Cessation information
- Option 12 provided a strong ‘look & feel’ for combined health warnings that is more impactful than mixed warning styles, with a more legible upper and lower case message compared to a capitalised warning. The use of white type on black gives good clear stand out, but the addition of a coloured panel for the cessation information means that the “call to action” isn’t lost.
- In many cases, Tax Stamps are likely to have an impact on production, since they’ll need to be repositioned and placed with more accuracy. It’s likely that many Member States may have to agree to reduce the size of Tax Stamps once the transitional period granted in TPD comes to an end.
- Whereas the new design and placement of combined health warnings won’t have any obvious significant impact on print and production of most packs for the cigarette and waterpipe sectors, other than the need to reposition a narrower Tax Stamp, both the RYO and ‘other’ sectors are likely to require some/additional investment. This is particularly the case for cigars, cigarillos and pipe tobacco, where Member States can decide whether the full regime will be applied.

Annex 1: References for jurisdictional audit

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Thrasher JT, Osman A, Moodie C, Hammond D, Bansal-Travers M, Cummings KM, Borland R, Yong H, Hardin J (in press). Promoting cessation resources through cigarette package warning labels: A longitudinal survey with adult smokers in Canada, Australia and Mexico. *Tobacco Control*.

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Annex 4

D5 report:

Editing of combined health warnings on smoked tobacco packaging

Editing of combined health warnings on smoked tobacco packaging

November 2015



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Introduction

This document is intended to assist when discussing with Member States the layout and design of combined health warnings (CHW) on tobacco products for smoking, according to the Tobacco Products Directive 2014/40/EU (TPD) and Commission Implementing Decision (EU) 2015/1842 on the technical specifications for combined health warnings.

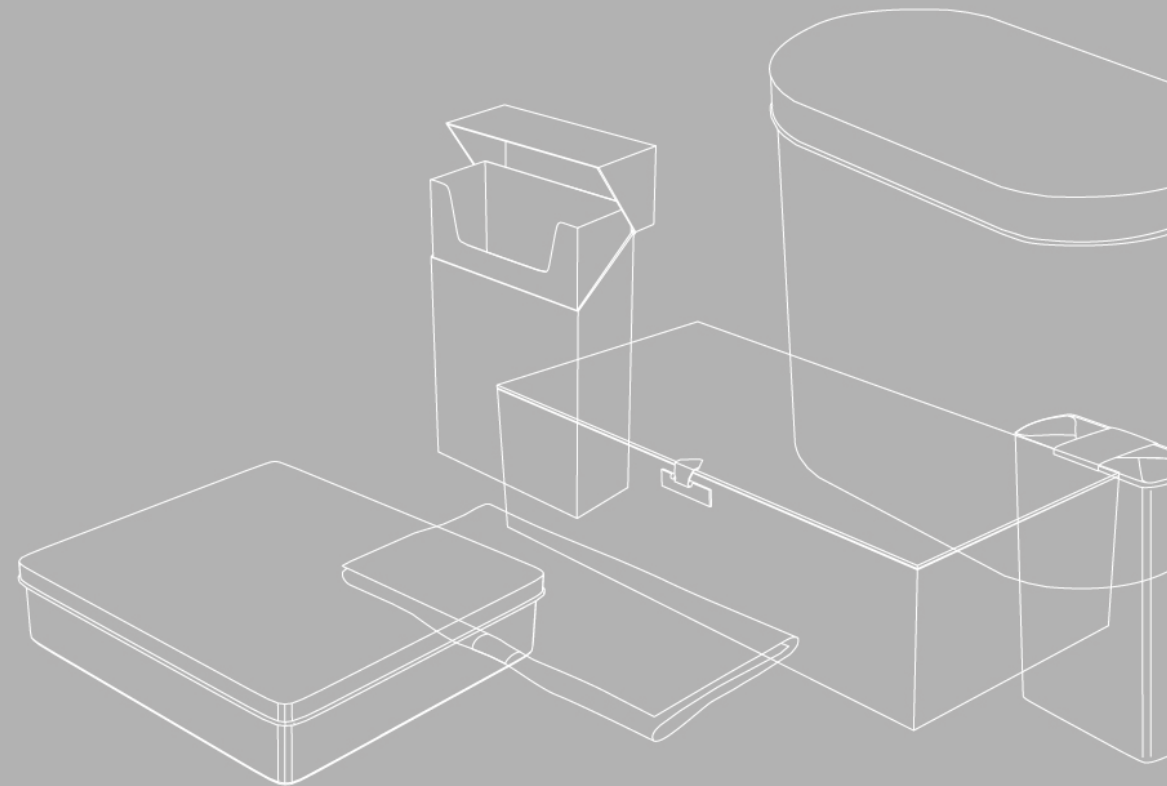
The three sets of images used in the combined health warnings are copyright of the European Union.

This document has no legal status.

This report was produced and prepared by Butcher & Gundersen, part of the B-M SFP consortium, under the Health Programme (2008-13) in the frame of a service contract with the Consumers Health and Food Executive Agency (Chafea) acting under the mandate from the European Commission. The content of this report represents the views of the B-M SFP consortium and is its sole responsibility; it can in no way be taken to reflect the views of the European Commission and/or Chafea or any other body of the European Union. The European Commission and/or Chafea do not guarantee the accuracy of the data included in this report, nor do they accept responsibility for any use made by third parties thereof.



Combined health warnings: Design style



Design style:

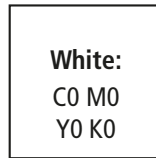
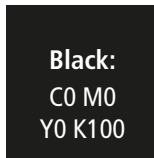
Content and colours

Content

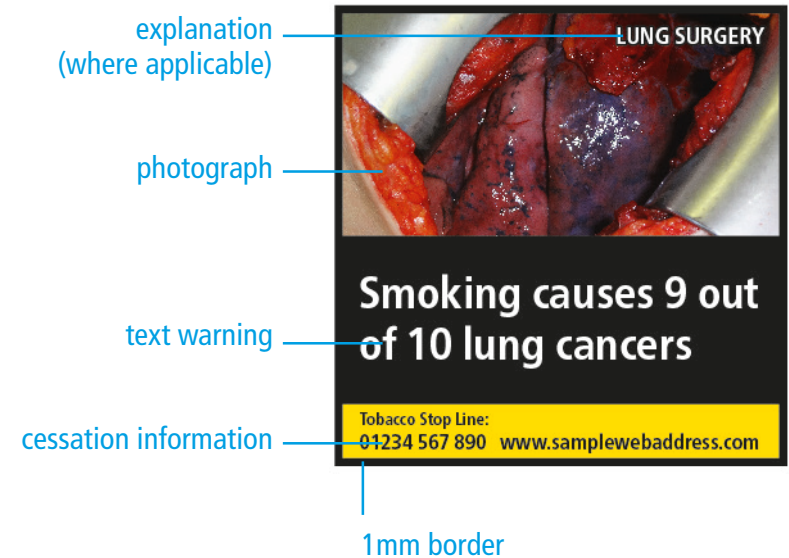
Combined health warnings must contain:

- One of the 14 text warnings
- Corresponding **photograph** (three sets of images per text warning, to be rotated on an annual basis)
- For two specific photographs, as shown in Annex II of the TPD, an **explanation** also appears alongside the image
- Smoking **cessation information** such as telephone number, email address &/or website
- A **border** of 1mm that sits inside the edge of the warning area

Colours



- Photographs should print in CMYK
- Text warnings print/reverse out as white text on a black panel; for regions with multiple languages, the first language should print in white, the second in warm yellow and the third (if applicable) in white
- Cessation information prints as black text on a warm yellow panel
- The 1mm border prints in black



Design style:

Typography

The typeface for the combined warnings is **Neue Frutiger Condensed Bold**. No other versions or weights of the Frutiger typeface should be used for any part of the text warning or cessation information.

**ABCDEFGHIJKLMNOPQRSTUVWXYZ
abcdefghijklmnopqrstuvwxyz 01234567890?!@%&**

Text warning

- The text warning should be in a uniform type size and scaled to fill the panel as much as possible, but allowing for an indentation of at least 2mm (inside the border, where applicable), from all sides.
- Text warnings can be split across one, two, three, four or five lines, depending on what works best for the language and to fill the panel.

Line spacing/Leading: Type should be set on leading that is 2pt larger than the font size (eg font size 12pt, line spacing 14pt).

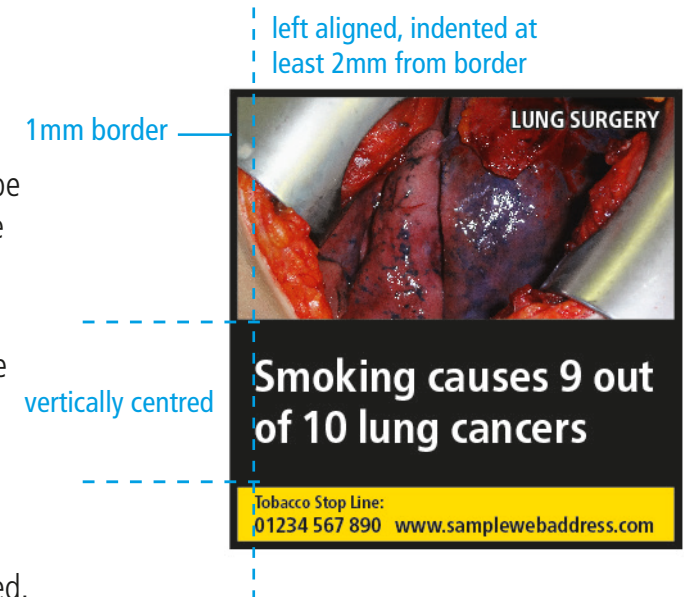
Minimum type size: 6pt.

Letter spacing: Standard letter spacing should be used.

Alignment/Indentation: Text should be left aligned and centred vertically within its panel. Text should be indented at least 2mm inside the border from the left edge and a minimum of 2mm indentation should be retained to the top, bottom and right edges.

Case and hyphenation: Text should be set in upper and lower case, in accordance with Annex I of the TPD. Hyphens should be avoided unless a language characteristic requires it or in extreme cases where the text warning would have to be significantly reduced to avoid hyphenation in narrow formats.

Exceptions: For warnings on the front of flip-top packs where multiple languages are required, or for products other than cigarettes, roll your own and waterpipe tobacco, where minimum type size &/or line spacing requirements are not possible to achieve, sizes may be reduced, providing that the text is legible when printed and not distorted. In all other instances, the specifications above should be followed.



Design style:

Typography continued

Explanation

- Explanation text only applies to these two photographs, as shown in Annex II of the TPD. For countries with multiple languages, the explanation should appear in each language, as shown here.
- Where required, explanations should appear in white and in UPPER CASE. A black keyline should be added to the text to help with legibility on the photograph.

Minimum type size: 5pt

Cessation information

- Cessation information should be sized to fill the warm yellow panel as much as possible, but allowing for an indentation of at least 1mm (inside the border), from the left and right edges.
- Layout of cessation information will depend on regional requirements, but the focus should be on the actual contact details (telephone number, web address etc).

Line spacing/Leading: Type should be set on leading that is 1pt to 2pt larger than the font size (eg font size 8pt, line spacing could be 9.5pt).

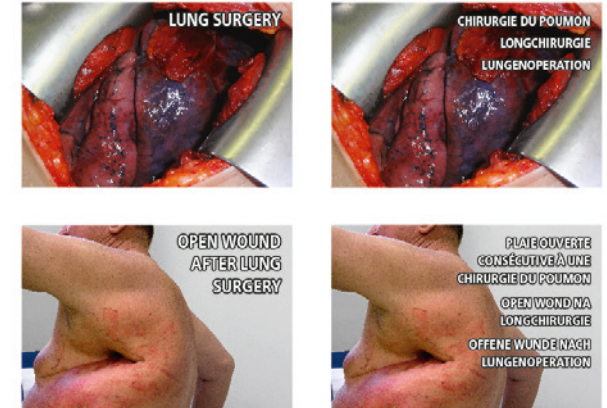
Minimum type size: 5pt.

Letter spacing: Standard letter spacing should be used.

Alignment/Indentation: Text should be left aligned and centred vertically within its panel. Text should be indented at least 1mm from the left and right edges, inside the border. Clear space should be left around text at the top and bottom of the panel.

Icons: If applicable, icons/logos can be included, providing they are part of the cessation information and they can be printed at a size that is legible. Logos/icons should be printed in black on the warm yellow panel.

Exceptions: For warnings on the front of flip-top packs where multiple languages are required, or for products other than cigarettes, roll your own and waterpipe tobacco, where minimum type size &/or line spacing requirements are not possible to achieve, sizes may be reduced, providing that the text is legible when printed and not distorted. In all other instances, the specifications above should be followed.



Design style:

Typography: dos & don'ts

Don't use hyphens or ampersands, unless a language characteristic requires it, or in extreme cases where the text warning would have to be significantly reduced to avoid hyphenation in narrow formats



Smokers' children are more likely to start smoking

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com



Smokers' children are more likely to start smoking

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com



Your smoke harms your children, family & friends

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com



Your smoke harms your children, family and friends

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com



Wenn Sie rauchen, schaden Sie Ihren Kindern, Ihrer Familie, Ihren Freunden

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com



Wenn Sie rauchen, schaden Sie Ihren Kindern, Ihrer Familie, Ihren Freunden

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com



Wenn Sie rauchen, schaden Sie Ihren Kindern, Ihrer Familie, Ihren Freunden

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com



Wenn Sie rauchen, schaden Sie Ihren Kindern, Ihrer Familie, Ihren Freunden

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com



Fumer nuit à vos poumons
Roken beschadigt uw longen
Rauchen schädigt Ihre Lunge

Tobacco Stop Line: 0123 45678
www.webaddress.be



Fumer nuit à vos poumons
Roken beschadigt uw longen
Rauchen schädigt Ihre Lunge

Tobacco Stop Line: 0123 45678
www.webaddress.be



Fumer nuit à vos poumons
Roken beschadigt uw longen
Rauchen schädigt Ihre Lunge

Tobacco Stop Line: 0123 45678
www.webaddress.be



Fumer nuit à vos poumons
Roken beschadigt uw longen
Rauchen schädigt Ihre Lunge

Tobacco Stop Line: 0123 45678
www.webaddress.be

Don't make text too small, or too close to the edge of the panel. Don't top align, base align, right align or centre text

For multiple language versions – don't use languages too close together or too far apart. Don't use different type sizes

Design style:

Imagery

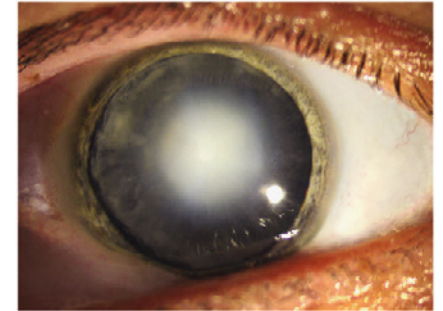
There are 42 photographs in total, each of which relates to one of the 14 warning messages (three images per warning message which are rotated annually).

- Technical files have been supplied for each of the 42 photographs, illustrated across four key shapes. This document also shows examples for the correct placement and crop of the images illustrated across five shapes (see pages 26 to 39)
- Where possible, the examples provided should be followed for the placement of photographs, however if the image needs to be adapted, the following rules apply:

Cropping: photographs should not be cropped too close in or too far away from the focal point of the image

Scaling: where necessary, photographs must be scaled in proportion and not stretched or condensed

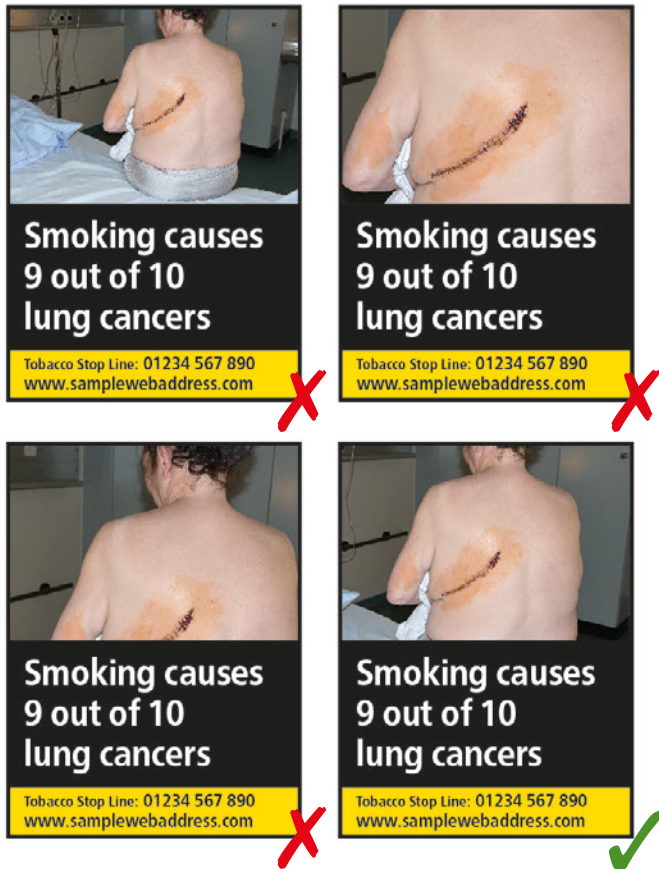
Retouching: photos must not be retouched or backgrounds extended. Colours should not be adjusted and effects should not be applied



Design style:

Imagery: dos & don'ts

Don't crop photographs too tightly or leave too much empty space. The focal point of the image must always be central



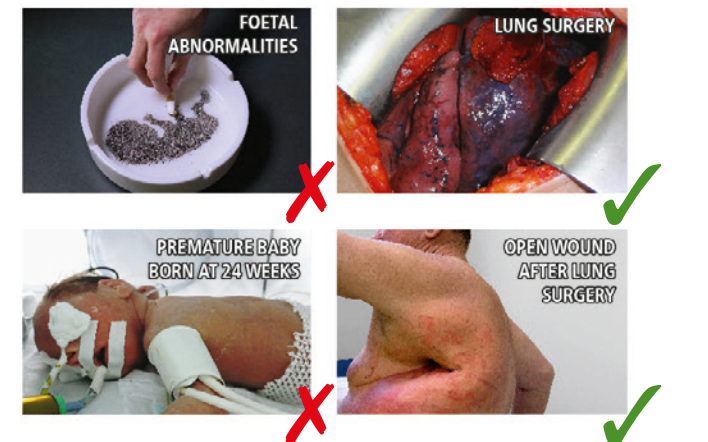
Don't use any photograph other than the one specified for that text warning (and the correct set)



Don't stretch or condense the photograph, adjust the colour or add any effects



Don't add an explanation to any photograph, other than the two shown in Annex II



Design style:

Print quality

Combined health warnings should be reproduced at the best quality possible for the substrate and print method.

- Photographs and text must be clear and legible, without distortion
- Combined health warnings must be printed in CMYK and reproduced at a minimum of 300dpi when printed at full size
- Where possible, a minimum of 155 lines per inch should be achieved

Technical files: have been created as vector graphics in Adobe Illustrator, with linked TIFF images and live text*. Technical files are supplied in four different shapes/sizes.

Warning photographs: are supplied as flattened Photoshop TIFF files at a minimum of 300dpi. Images have been saved using the 'ISO Coated v2 300% (ECI)' Photoshop profile, without compression.

** Please note that due to licensing, the Neue Frutiger Condensed Bold typeface has not been supplied and will need to be purchased as required*

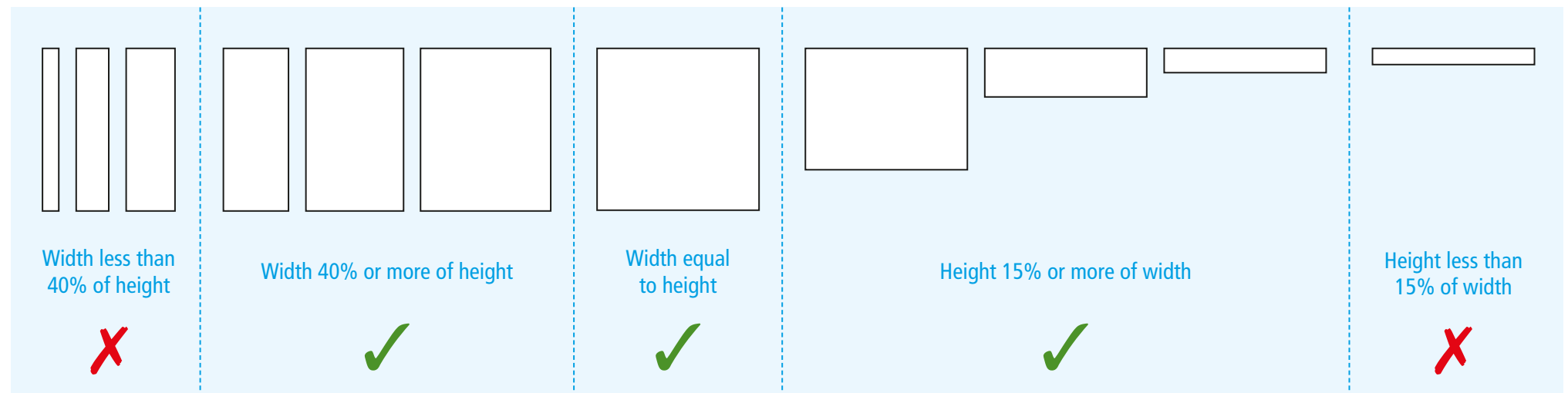
Design style:

Warning shapes

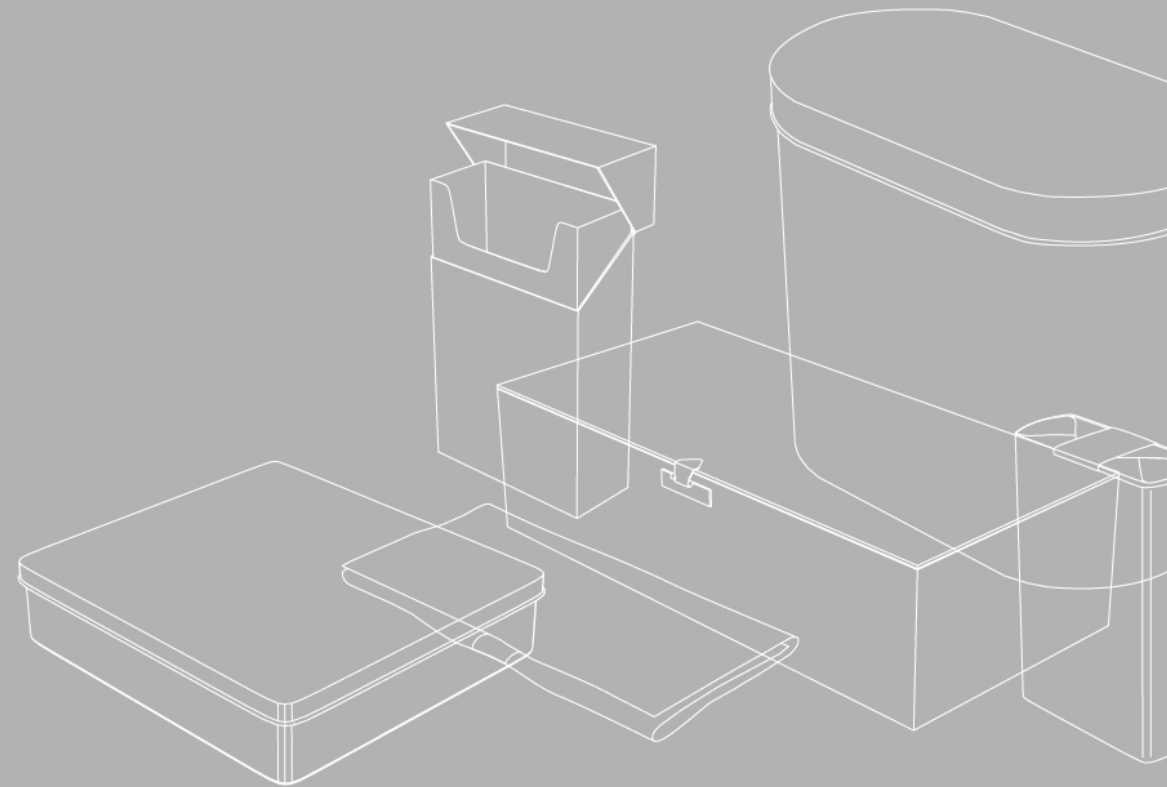
- Warnings must be **65% of both the external front and back surface** of a unit packet and any outside packaging
- Warnings must be **square or rectangular** in shape, with **square corners**
- Warnings must **follow the direction of branding** or any other information on that surface

Proportions of warnings:

- For warnings that are **taller than they are wide (portrait)**, the width must be at least 40% of the height to avoid distortion of the warning
- For warnings that are **wider than they are tall (landscape)**, the height must be at least 15% of the width of the height to avoid distortion of the warning



Combined health warnings: Layouts



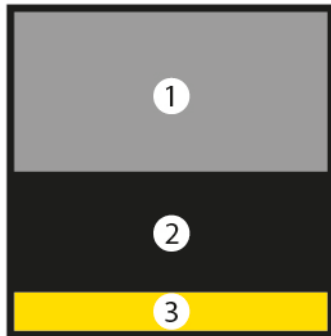
Layouts:

Core layouts

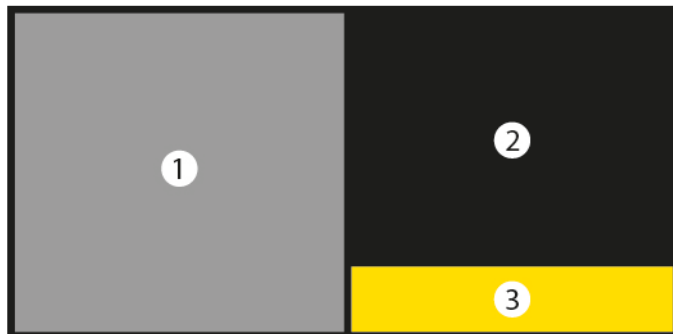
There are two core layouts for combined health warnings.

In both cases, the photograph is the primary focus and fills 50% of the warning:

Layout A: Stacked – where the photograph is positioned above the text warning and cessation information



Layout B: Side-by-side – where the photograph is positioned to the left of the text warning and cessation information



1 = photograph

2 = text warning panel

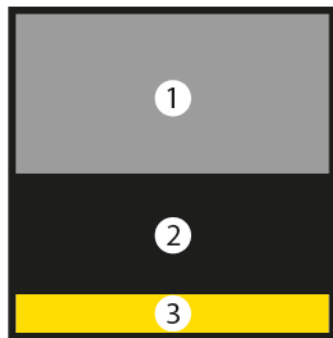
3 = cessation information panel

Core layouts continued

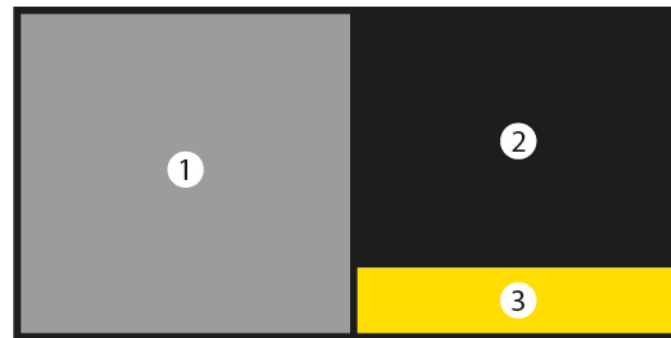
Selecting the correct layout:

The shape of the warning will determine which layout should be used. In general, the following rules apply, though there are exceptions*:

- **Flip-top packs:** use **Layout A: Stacked** (see exceptions* for the front of flip-top packs)
- **For all other pack types:**
 - for warnings that are **square** in shape, use **Layout A: Stacked**
 - for warnings that are **taller than they are wide (portrait)**, use **Layout A: Stacked**
 - for warnings that are **wider than they are tall (landscape)**, **Layout B: Side-by-side** or **Layout A: Stacked** can be used, depending on the proportions of the shape*



Layout A: Stacked



Layout B: Side-by-side

1 = photograph
2 = text warning panel
3 = cessation information panel

* See page 16 for exceptions and then use the **layout selector** on page 17 to check the format that should be used, depending on the shape of your warning

Layouts:

Layout exceptions

Layout exceptions* must ONLY be used in the following circumstances...

Exception 1: Extra wide landscape warnings

- For landscape shaped warnings, where the height is only 15-20% of the width, the photograph is still positioned to the left of the warning, but only fills 35% of the warning area, to allow for clarity of the image and space for warning text
- In these instances, use [Layout C: Side-by-side \(extra wide\)](#)

Exception 2: Flip-top packs (front faces)

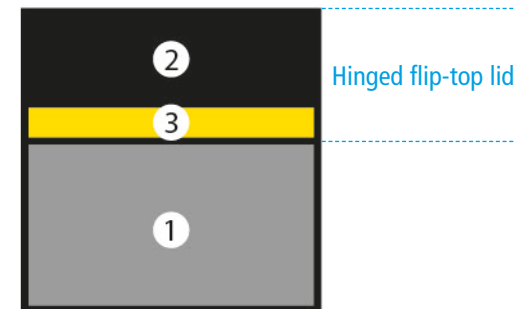
To ensure that the photograph fills 50% of the warning, without being split when the pack is opened, a different layout may need to be used for combined health warnings on the front of flip-top packs:

For the front of unit packs where the flip-top lid is too small to accommodate a 50% image at the top without it being split:

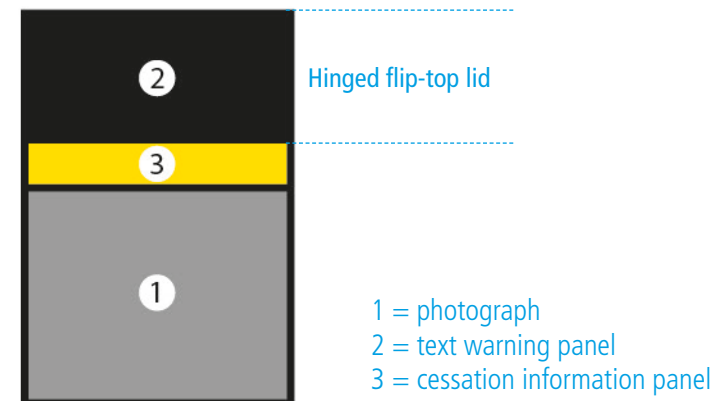
- The photograph should be positioned **below** the text warning and cessation information, on the main body of the pack, rather than the lid
- Because the size and shape of flip-top packs differ and therefore the warning shapes will vary, the proportions of the main elements will need to change. Depending on the dimensions of the warning shape and the depth of the lid, the cessation information panel will either sit:
 - **within** the lid area – see [Layout D: Stacked \(reversed 1\)](#)
 - **below** the lid, on the main body of the pack – see [Layout E: Stacked \(reversed 2\)](#)



Layout C: Side-by-side (extra wide)



Layout D: Stacked (reversed 1)



Layout E: Stacked (reversed 2)

* Use the **layout selector** on page 17 to check the format that should be used, depending on the shape of your warning

Layouts:




Layout selector: which layout to use

Core layouts		Exception layouts		
Layout A: Stacked	Layout B: Side-by-side	Layout C: Side-by-side (extra wide)	Layout D: Stacked (reversed 1)	Layout E: Stacked (reversed 2)

Flip-top pack types:

Front face (where the lid is large enough to accommodate a 50% image, without being split)	✓	-	-	-	-
Front face (where the lid is too small to accommodate a 50% image, without being split)	-	-	-	✓*	✓*
Back face	✓	-	-	-	-

All other pack types:

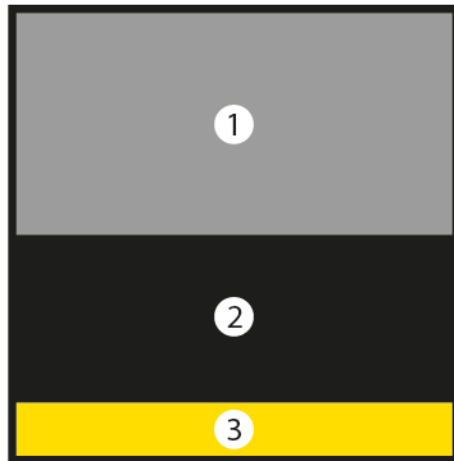
Portrait warning shapes: 					
Width 40% to 100% of height	✓	-	-	-	-
Square warning shapes: 					
Width equal to height	✓	-	-	-	-
Landscape warning shapes: 					
Height 15% to 20% of width	-	-	✓	-	-
Height more than 20% but less than 65% of width	-	✓	-	-	-
Height 65% to 70% of width	✓*	✓*	-	-	-
Height more than 70% of width	✓	-	-	-	-

* in these cases, either format can be used, providing the elements of the combined health warning remain fully visible and are not distorted

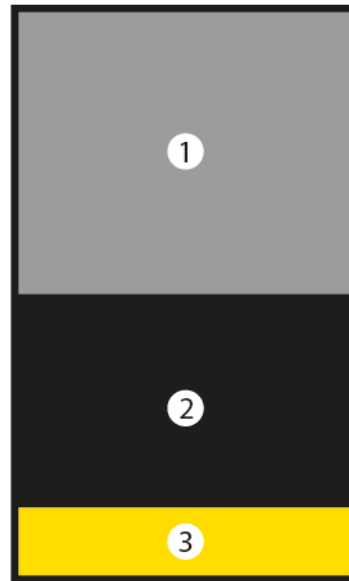
Layouts:

Layout A: Stacked

Balance of photograph, text warning and cessation information panel:



1 = photograph
2 = text warning panel
3 = cessation information panel



- The photograph sits at the top of the warning shape, above the black text warning panel; the yellow cessation information panel sits at the base of the warning shape
- The whole warning shape is surrounded by a 1mm black border that sits inside the edge of the warning shape
- The warning shape is divided into three areas:
 - Photograph:** 50% of the warning shape
 - Text warning panel:** 38% of the warning shape
 - Cessation information panel:** 12% of the warning shape

All percentages should be calculated based on the dimensions of the warning shape **inside** of the outer 1mm black border

Exception: For flip-top packs only, where the lid area is larger than 50% of the warning shape, meaning the text warning would be split when the pack is opened, the proportions of the warning shape may change:

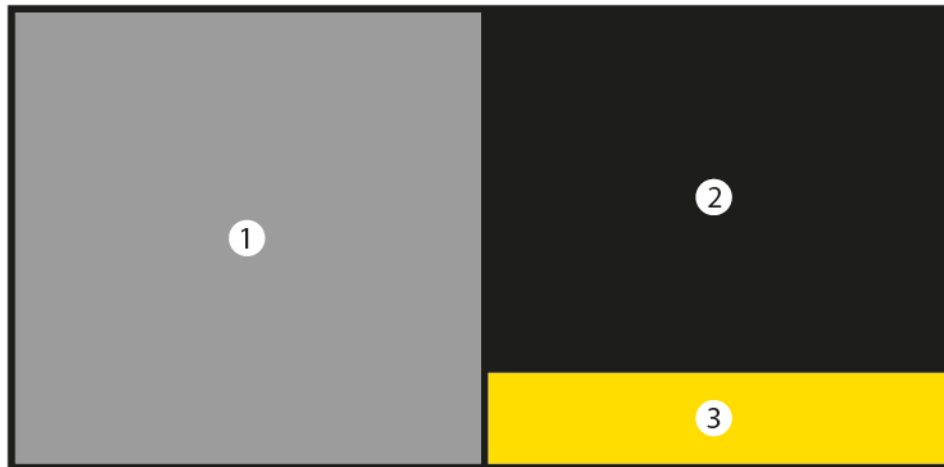
- **Photograph:** at least 50% of the warning shape and sit in its entirety on the hinged lid
- **Text warning panel:** at least 30% of the warning shape
- **Cessation information panel:** 10-12% of the warning shape

All percentages should be calculated based on the dimensions of the warning shape **inside** of the outer 1mm black border

Layouts:

Layout B: Side-by-side

Balance of photograph, text warning and cessation information panel:



1 = photograph
2 = text warning panel
3 = cessation information panel

- The photograph sits to the left of the warning shape; the black text warning panel sits above the yellow cessation information panel, to the right of the warning shape
- The whole warning shape is surrounded by a 1mm black border that sits inside the edge of the warning shape
- A black 1mm keyline inside the yellow panel divides the cessation information and the photograph
- The warning shape is divided into three areas:
 - Photograph:** 50% of the warning shape
 - Text warning panel:** 40% of the warning shape
 - Cessation information panel:** 10% of the warning shape

All percentages should be calculated based on the dimensions of the warning shape **inside** of the outer 1mm black border

Layouts:

Layout C: Side-by-side (extra wide)

Balance of photograph, text warning and cessation information panel:



1 = photograph
2 = text warning panel
3 = cessation information panel

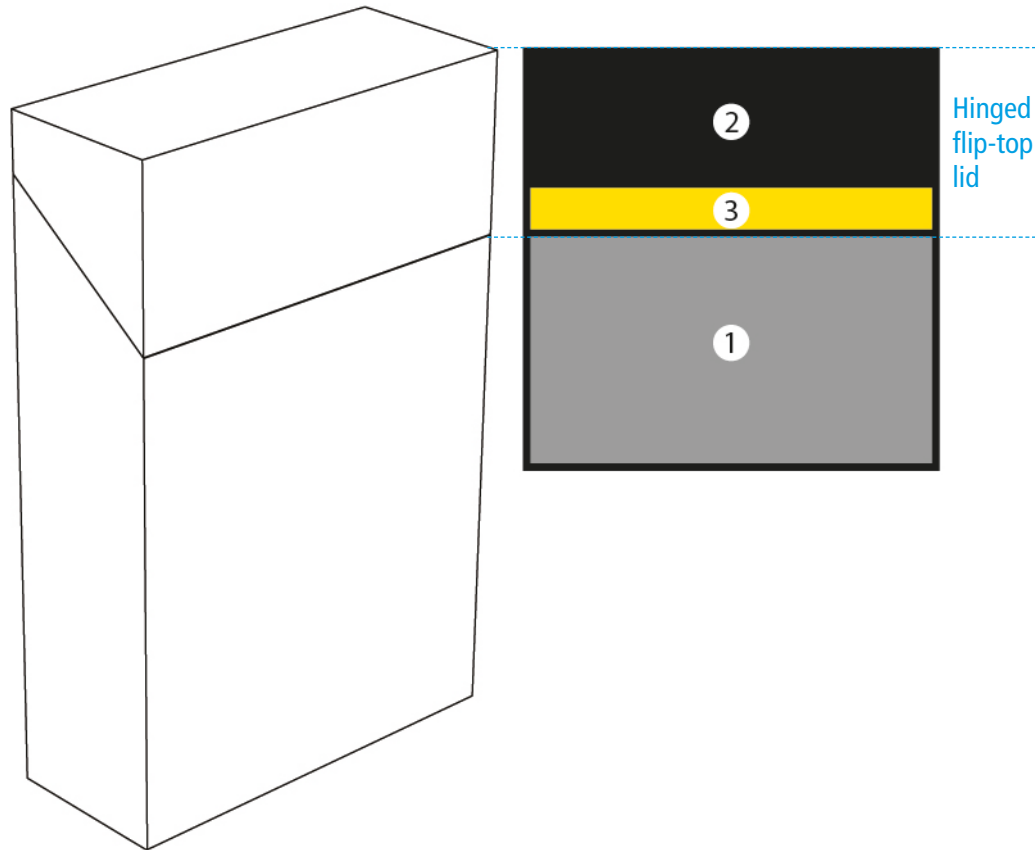
- The photograph sits to the left of the warning shape; the black text warning panel sits above the yellow cessation information panel, to the right of the warning shape
- The whole warning shape is surrounded by a 1mm black border that sits inside the edge of the warning shape
- A black 1mm keyline inside the yellow panel divides the cessation information and the photograph
- The warning shape is divided into three areas:
 - Photograph:** 35% of the warning shape
 - Text warning panel:** 50% of the warning shape
 - Cessation information panel:** 15% of the warning shape

All percentages should be calculated based on the dimensions of the warning shape **inside** of the outer 1mm black border

Layouts:

Layout D: Stacked (reversed 1)

Balance of photograph, text warning and cessation information panel:



1 = photograph
2 = text warning panel
3 = cessation information panel

- The photograph sits at the bottom of the warning shape, below the lid; the black text warning panel and yellow cessation information panel sit on the hinged lid
- The whole warning shape is surrounded by a 1mm black border that sits inside the edge of the warning shape
- A black 1mm keyline inside the yellow panel divides the cessation information panel and the photograph

Because flip-top packs differ in size and shape, the proportions of the main elements will need to change to ensure that no elements are split when the pack is opened

The warning shape is divided into three areas and the following rules must apply:

- **Photograph** must be at least 50% of the warning shape, not including any borders; the image must sit in its entirety on the main body of the pack
- **Text warning panel and cessation information panel** must sit in their entirety on the hinged lid:

Text warning panel must be at least 30% of the warning shape

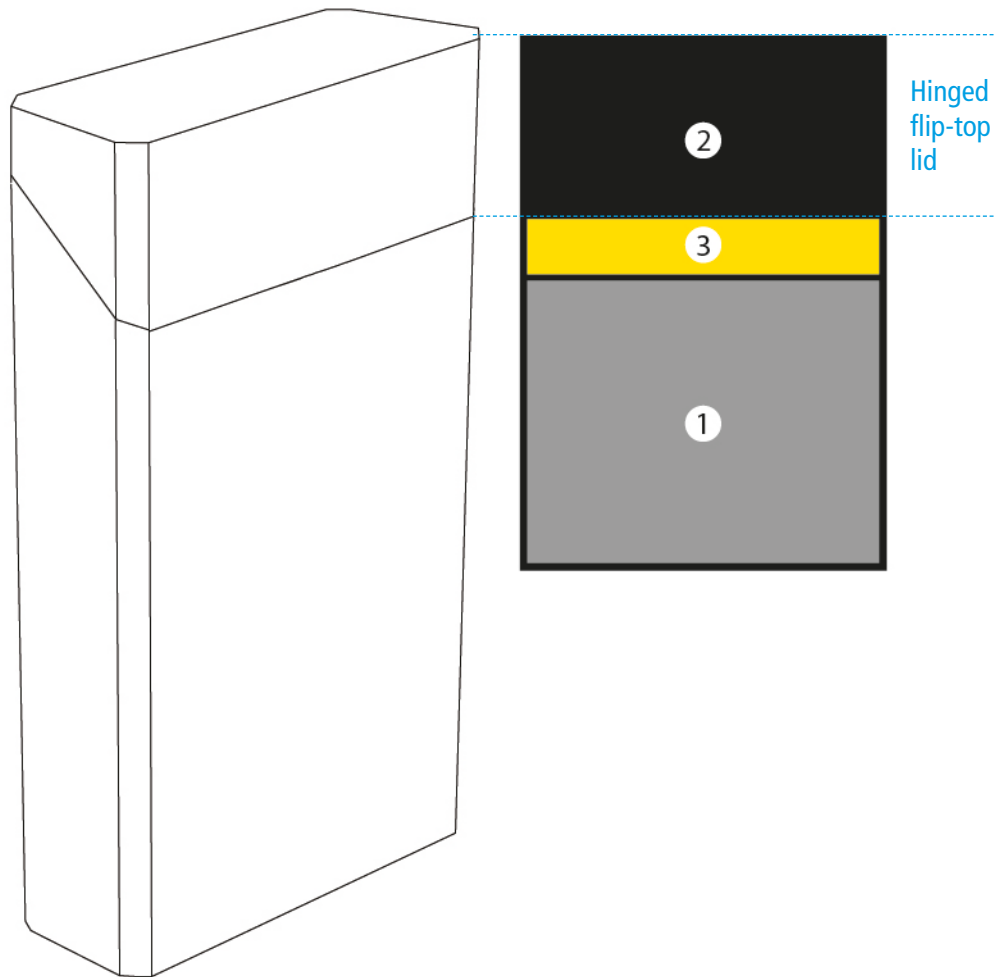
Cessation information panel must be between 10-12% of the warning shape

All percentages should be calculated based on the dimensions of the warning shape **inside** of the outer 1mm black border

Layouts:

Layout E: Stacked (reversed 2)

Balance of photograph, text warning and cessation information panel:



1 = photograph
2 = text warning panel
3 = cessation information panel

- The photograph and yellow cessation information panel sit at the bottom of the warning shape, below the lid; the black text warning panel sits on the hinged lid
- The whole warning shape is surrounded by a 1mm black border that sits inside the edge of the warning shape
- A black 1mm keyline sits in the yellow panel and divides the cessation information from the photograph

Because flip-top packs differ in size and shape, the proportions of the main elements will need to change to ensure that no elements are split when the pack is opened

The warning shape is divided into three areas and the following rules must apply:

- **Photograph** must be at least 50% of the warning shape, not including any borders; the image must sit in its entirety on the main body of the pack
- **Text warning panel** must be at least 30% of the warning shape; the text warning panel must sit in its entirety on the hinged lid
- **Cessation information panel** must be between 10-12% of the warning shape; the cessation information panel must sit in its entirety on the main body of the pack

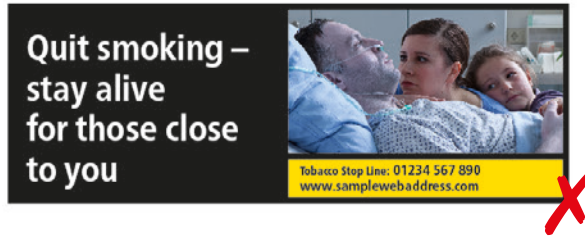
All percentages should be calculated based on the dimensions of the warning shape **inside** of the outer 1mm black border

Layouts:

Layouts: dos & don'ts

Don't change the position, proportions, orientation or colour of the elements in the combined health warning. Don't scale or change the weight of the border – all warnings, at all sizes, must have a border of 1mm

Don't position the combined health warning in a different direction to any branding etc



Layouts:

Layouts: dos & don'ts continued

Don't use a layout other than that specified for your warning shape in the layout grid or use a layout that distorts the text and/or photograph



Don't use the reverse layouts for any surface other than the front of a flip-top pack



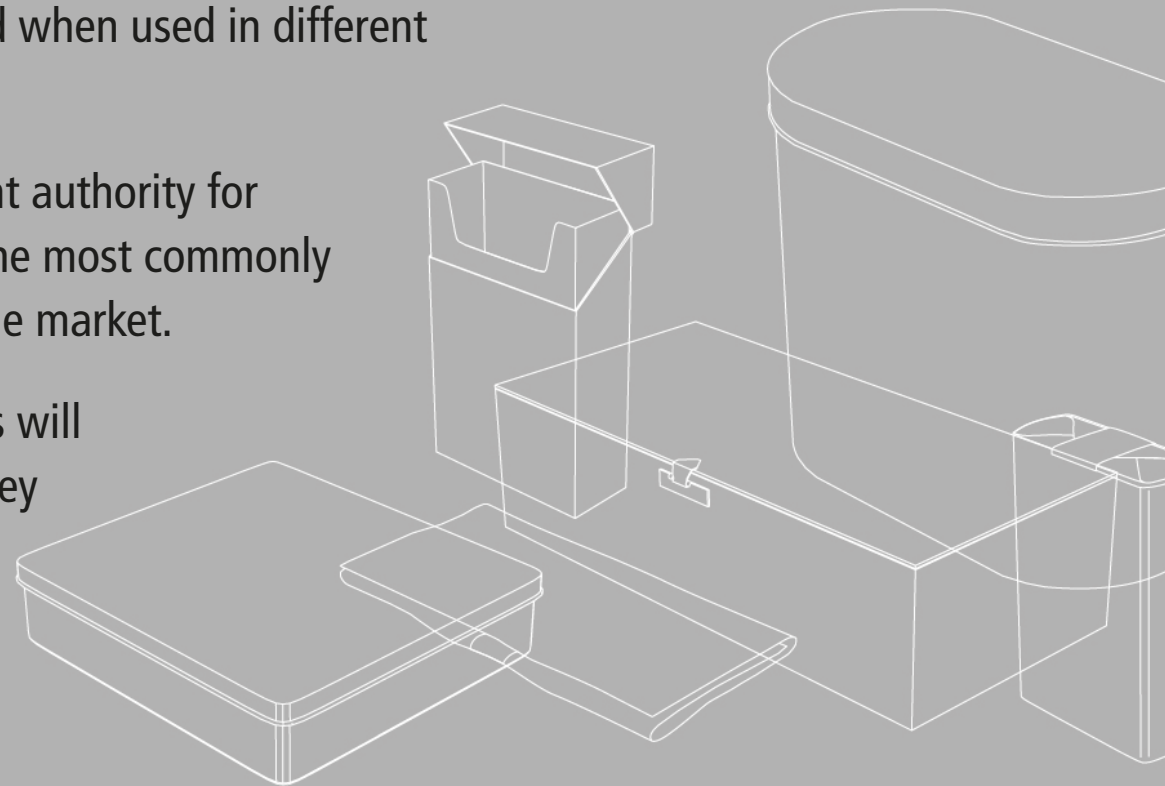
Combined health warnings: Example layouts

The following pages show the 14 warning messages, with their associated images, illustrated across five example (single language) layouts. Multiple language examples have also been provided.

These layouts have been selected to represent a range of different shapes and to illustrate how the images should be cropped when used in different proportions, including more extreme wider crops.

Technical files can be obtained from your competent authority for the four different shapes identified as likely to be the most commonly used across the different pack types available on the market.

Please note, the example layouts and technical files will not cover all pack types on the market, however, they should give enough information to extrapolate to other shapes and sizes.

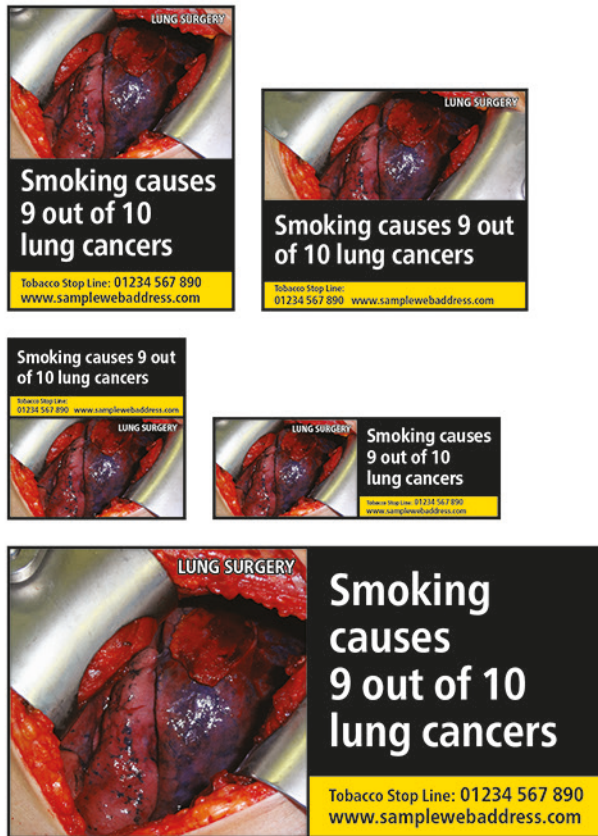


Example layouts:

Single language versions

Text warning 1: Smoking causes 9 out of 10 lung cancers

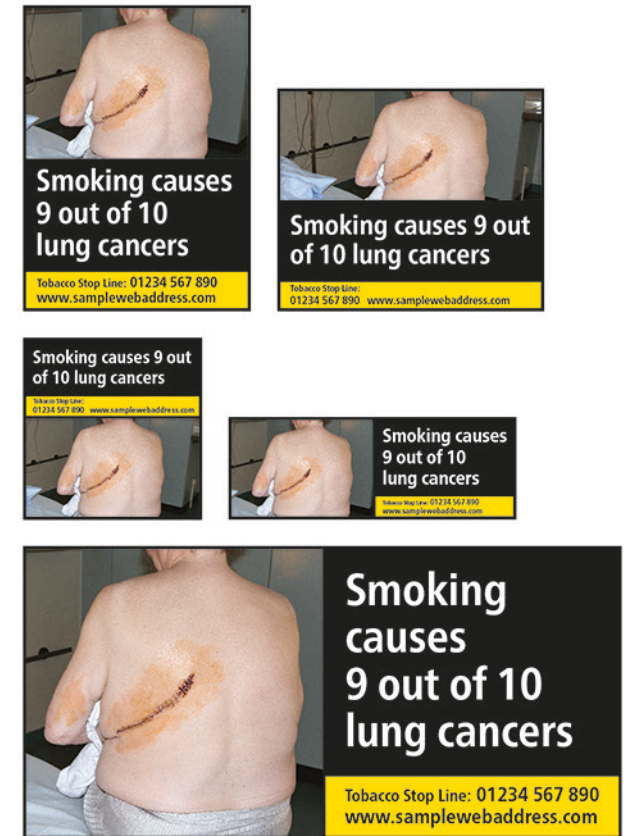
Set 1 photograph



Set 2 photograph



Set 3 photograph

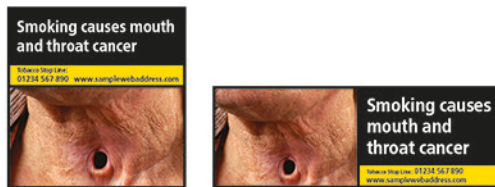


Example layouts:

Single language versions continued

Text warning 2: Smoking causes mouth and throat cancer

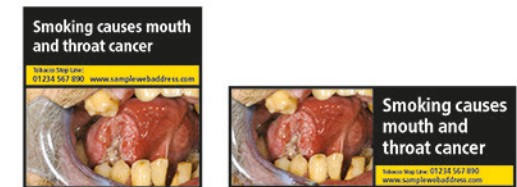
Set 1 photograph



Set 2 photograph



Set 3 photograph

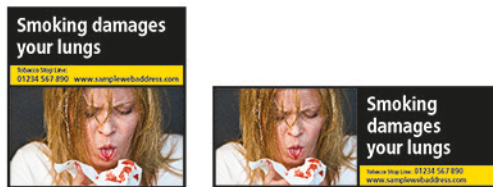


Example layouts:

Single language versions continued

Text warning 3: Smoking damages your lungs

Set 1 photograph



Set 2 photograph



Set 3 photograph



Example layouts:

Single language versions continued

Text warning 4: Smoking causes heart attacks

Set 1 photograph



Set 2 photograph



Set 3 photograph



Example layouts:

Single language versions continued

Text warning 5: Smoking causes strokes and disability

Set 1 photograph



Set 2 photograph



Set 3 photograph



Example layouts:

Single language versions continued

Text warning 6: Smoking clogs your arteries

Set 1 photograph



Set 2 photograph



Set 3 photograph



Example layouts:

Single language versions continued

Text warning 7: Smoking increases the risk of blindness

Set 1 photograph



Set 2 photograph



Set 3 photograph



Example layouts:

Single language versions continued

Text warning 8: Smoking damages your teeth and gums

Set 1 photograph



Set 2 photograph



Set 3 photograph



Example layouts:

Single language versions continued

Text warning 9: Smoking can kill your unborn child

Set 1 photograph



Set 2 photograph



Set 3 photograph



Example layouts:

Single language versions continued

Text warning 10: Your smoke harms your children, family and friends

Set 1 photograph



Set 2 photograph



Set 3 photograph

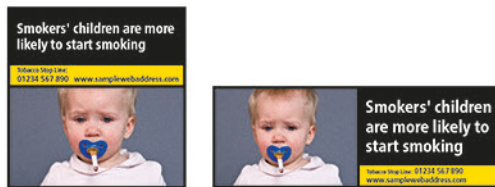


Example layouts:

Single language versions continued

Text warning 11: Smokers' children are more likely to start smoking

Set 1 photograph



Set 2 photograph



Set 3 photograph



Example layouts:

Single language versions continued

Text warning 12: Quit smoking – stay alive for those close to you

Set 1 photograph



Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Set 2 photograph



Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Set 3 photograph



Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Quit smoking – stay alive for those close to you

Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Quit smoking – stay alive for those close to you

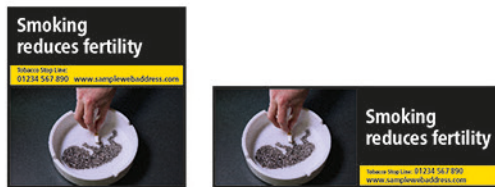
Tobacco Stop Line: 01234 567 890
www.samplewebaddress.com

Example layouts:

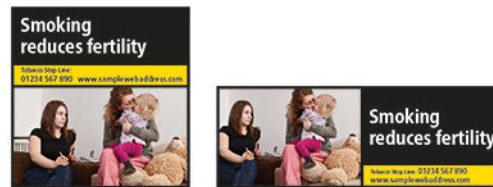
Single language versions continued

Text warning 13: Smoking reduces fertility

Set 1 photograph



Set 2 photograph



Set 3 photograph



Example layouts:

Single language versions continued

Text warning 14: Smoking increases the risk of impotence

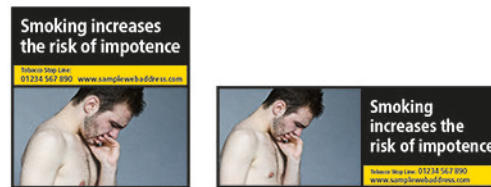
Set 1 photograph



Set 2 photograph



Set 3 photograph



Example layouts:

Multiple language versions

Text warning 1:

Smoking causes 9 out of 10 lung cancers



Text warning 2:

Smoking causes mouth and throat cancer



Text warning 3:

Smoking damages your lungs



Text warning 4:

Smoking causes heart attacks



Text warning 5:

Smoking causes strokes and disability



Text warning 6:

Smoking clogs your arteries



Example layouts:

Multiple language versions continued

Text warning 7:

Smoking increases the risk of blindness

Fumer augmente le risque de devenir aveugle
Roken vergroot de kans op blindheid
Rauchen erhöht das Risiko zu erblinden

Tabak Stop Lijn 0123 45678 Ligne Tabac-Stop
www.xxxxxxxx.be www.xxxxxxxx.be

Fumer augmente le risque de devenir aveugle
Roken vergroot de kans op blindheid
Rauchen erhöht das Risiko zu erblinden

Tabak Stop Lijn 0123 45678 Ligne Tabac-Stop
www.xxxxxxxx.be www.xxxxxxxx.be

Text warning 8:

Smoking damages your teeth and gums

Fumer nuit à vos dents et à vos gencives
Roken beschadigt uw gebit en tandvlees
Rauchen schädigt Zähne und Zahnfleisch

Tabak Stop Lijn 0123 45678 Ligne Tabac-Stop
www.xxxxxxxx.be www.xxxxxxxx.be

Fumer nuit à vos dents et à vos gencives
Roken beschadigt uw gebit en tandvlees
Rauchen schädigt Zähne und Zahnfleisch

Tabak Stop Lijn 0123 45678 Ligne Tabac-Stop
www.xxxxxxxx.be www.xxxxxxxx.be

Text warning 9:

Smoking can kill your unborn child

Fumer peut tuer l'enfant que vous attendez
Roken kan uw ongeboren kind doden
Rauchen kann Ihr ungeborenes Kind töten

Tabak Stop Lijn 0123 45678 Ligne Tabac-Stop
www.xxxxxxxx.be www.xxxxxxxx.be

Fumer peut tuer l'enfant que vous attendez
Roken kan uw ongeboren kind doden
Rauchen kann Ihr ungeborenes Kind töten

Tabak Stop Lijn 0123 45678 Ligne Tabac-Stop
www.xxxxxxxx.be www.xxxxxxxx.be

Text warning 10: Your smoke harms your children, family and friends

Votre fumée est dangereuse pour vos enfants, votre famille et vos amis
Uw rook is schadelijk voor uw kinderen, familie en vrienden
Wenn Sie rauchen, schaden Sie Ihren Kindern, Ihrer Familie, Ihren Freunden

Tabak Stop Lijn 0123 45678 Ligne Tabac-Stop
www.xxxxxxxx.be www.xxxxxxxx.be

Votre fumée est dangereuse pour vos enfants, votre famille et vos amis
Uw rook is schadelijk voor uw kinderen, familie en vrienden
Wenn Sie rauchen, schaden Sie Ihren Kindern, Ihrer Familie, Ihren Freunden

Tabak Stop Lijn 0123 45678 Ligne Tabac-Stop
www.xxxxxxxx.be www.xxxxxxxx.be

Text warning 11: Smokers' children are more likely to start smoking

Les enfants de fumeurs ont plus de risques de devenir fumeurs
Kinderen van rokers gaan zelf vaak roken
Kinder von Rauchern werden oft selbst zu Rauchern

Tabak Stop Lijn 0123 45678 Ligne Tabac-Stop
www.xxxxxxxx.be www.xxxxxxxx.be

Les enfants de fumeurs ont plus de risques de devenir fumeurs
Kinderen van rokers gaan zelf vaak roken
Kinder von Rauchern werden oft selbst zu Rauchern

Tabak Stop Lijn 0123 45678 Ligne Tabac-Stop
www.xxxxxxxx.be www.xxxxxxxx.be

Text warning 12: Quit smoking – stay alive for those close to you

Arrêtez de fumer : restez en vie pour vos proches
Stop nu – blijf leven voor je naaste familie en vrienden
Das Rauchen aufgeben – für Ihre Lieben weiterleben

Tabak Stop Lijn 0123 45678 Ligne Tabac-Stop
www.xxxxxxxx.be www.xxxxxxxx.be

Arrêtez de fumer : restez en vie pour vos proches
Stop nu – blijf leven voor je naaste familie en vrienden
Das Rauchen aufgeben – für Ihre Lieben weiterleben

Tabak Stop Lijn 0123 45678 Ligne Tabac-Stop
www.xxxxxxxx.be www.xxxxxxxx.be

Example layouts:

Multiple language versions continued

Text warning 13:
Smoking reduces fertility



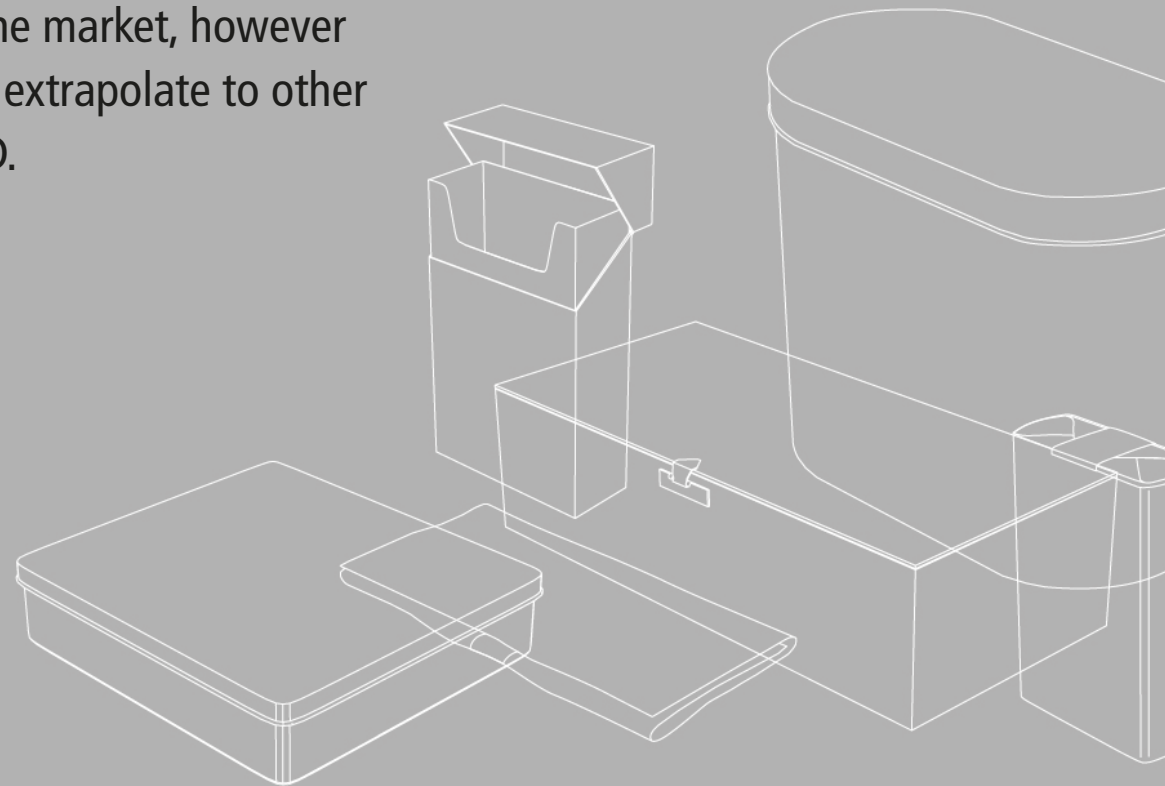
Text warning 14:
Smoking increases the risk of impotence



Combined health warnings: On-pack examples

The following pages show examples for the placement of combined health warnings, visualised across the 25 most commonly used or representative packs for smoked tobacco, after the transition period for tax stamps has expired.

Please note, this does not cover all pack types on the market, however these examples should give enough information to extrapolate to other pack types, shapes and sizes allowed under the TPD.



On-pack examples:

Cigarettes

Flip-top box, square corners (standard)



CHW covers 65% of front & back surfaces.

This example shows:

- Front: **Layout D: Stacked (reversed 1)**
- Back: **Layout A: Stacked**
- CHW aligned to top & full width of pack

Flip-top box, square corners (wide, deep pack)



CHW covers 65% of front & back surfaces

This example shows:

- Front: **Layout D: Stacked (reversed 1)**
- Back: **Layout A: Stacked**
- CHW aligned to top & full width of pack

Flip-top box, bevel corner (tall pack)



CHW covers 65% of front & back surfaces (calculated as if the pack has square edges)

This example shows:

- Front: **Layout E: Stacked (reversed 2)**
- Back: **Layout A: Stacked**
- CHW aligned to top & full width of pack, without extending around bevelled edge

Flip-top box, rounded corner



CHW covers 65% of front & back surfaces (calculated as if the pack has square edges)

This example shows:

- Front: **Layout D: Stacked (reversed 1)**
- Back: **Layout A: Stacked**
- CHW aligned to top & full width of pack, without extending around rounded edge

Cigarettes continued

Shoulder hinged box (rectangular)



CHW covers 65% of front & back surfaces

This example shows:

- Front & back:
Layout A: Stacked
- CHW aligned to shoulder & full width of pack

Soft pack



CHW covers 65% of front & back surfaces

This example shows:

- Front & back:
Layout A: Stacked
- CHW aligned to top & full width of front/back flat surfaces
- Banderole sticker affixed to aluminium inner layer, with outer soft card layer attached with glue dots

Outer packaging (flip-top unit multi-pack)



CHW covers 65% of front & back surfaces

This example shows:

- Front & back:
Layout B: Side-by-side
- CHW aligned to top hinge of pack and left edge

Outer packaging (shoulder hinged box multi-pack)



CHW covers 65% of front & back surfaces

This example shows:

- Front & back:
Layout A: Stacked
- CHW aligned to top hinge of pack and left edge

On-pack examples:

Roll your own (RYO)

Pouch with flap, wrap-around (two-step opening)



Option A

CHW covers 65% of front & back surfaces when pouch closed

This example shows:

- Opening & flat sides: [Layout B: Side-by-side](#)
- CHW aligned to top & full width of pack, but allowing for print tolerances



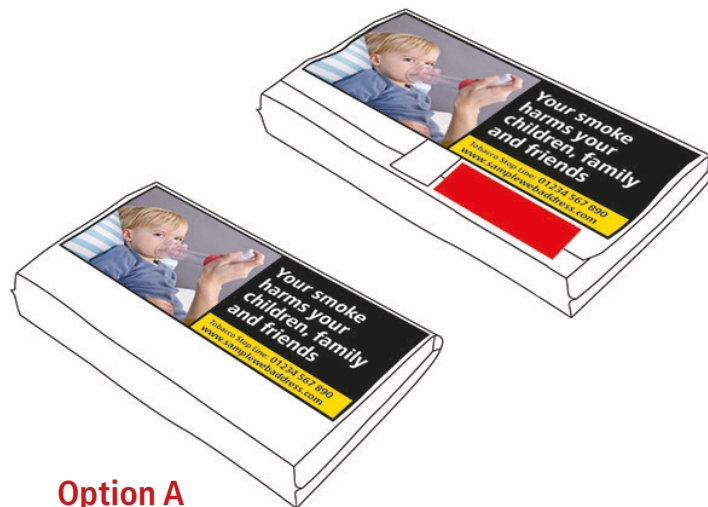
Option B

CHW covers 65% of front & back surfaces when pouch closed

This example shows:

- Opening side: [Layout B: Side-by-side](#)
- Flat side: [Layout A: Stacked](#)
- CHW aligned to top & left edge of pack, but allowing for print tolerances
- CHW orientated to follow same direction as branding

Pouch with flap, flat bottomed (one-step opening)



Option A

CHW covers 65% of front & back surfaces when pouch closed

This example shows:

- Opening & flat sides: [Layout B: Side-by-side](#)
- CHW aligned to top & full width of pack, but allowing for print tolerances



Option B

CHW covers 65% of front & back surfaces when pouch closed

This example shows:

- Opening side: [Layout B: Side-by-side](#)
- Flat side: [Layout A: Stacked](#)
- CHW aligned to top & left edge of pack, but allowing for print tolerances
- CHW orientated to follow same direction as branding

On-pack examples:

Roll your own (RYO) continued

Standing pouch/Zip bag



CHW covers 65% of front & back surfaces (after the disposable tear strip has been removed)

This example shows:

- Front & back:
Layout A: Stacked
- CHW aligned to slightly below tear line, so warning not damaged when pouch opened

Front: aligned to full width of pack, but allowing for print tolerances

Back: aligned to left, to allow for tax stamp

Cylinder, card



CHW covers 65% of front & back surfaces; each surface calculated as 1/2 the circumference, **including** the area covered by the lip of the lid when positioned on pack

This example shows:

- Front & back:
Layout A: Stacked
- CHW aligned to base of lid; warnings positioned equidistant from each other
- Proportions calculated to allow for positioning of tax stamp & to ensure full visibility when viewed front or back

Cylindrical bucket



CHW covers 65% of front & back surfaces; each surface calculated as 1/2 the circumference, **not** including the protruding 'lip' of the pack

This example shows:

- Front & back: **Layout B: Side-by-side**
- CHW aligned to protruding 'lip'; warnings positioned equidistant from each other
- Proportions calculated to ensure full visibility when viewed front or back

On-pack examples:

Waterpipe

Carton box (portrait, tuck-top)

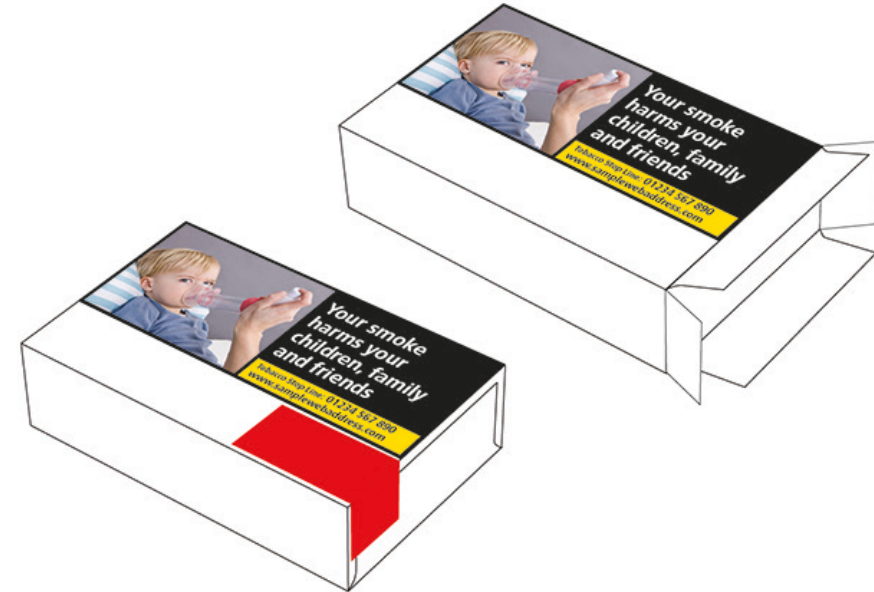


CHW covers 65% of front & back surfaces

This example shows:

- Front & back: **Layout A: Stacked**
- CHW aligned to top edge & full width of pack

Carton box (landscape)



CHW covers 65% of front & back surfaces

This example shows:

- Front & back: **Layout B: Side-by-side**
- CHW aligned to top edge & full width of pack

On-pack examples:

Cigars, cigarillos & pipe tobacco

Hinged box, wood (cigars; cigarillos)



CHW covers 65% of front & back surfaces

This example shows:

- Front: **Layout B: Side-by-side**
- Back: **Layout A: Stacked**
- CHW aligned to top hinged edge & left edge, but allowing for print tolerances/label application tolerances at edges; CHW on front of pack calculated and positioned to allow for metal clasp closure

Hinged box, tin, square (cigarillos; pipe)



CHW covers 65% of front & back surfaces

This example shows:

- Front & back: **Layout B: Side-by-side**
- CHW aligned to top hinged edge and full width of pack, but allowing for print tolerances/label application tolerances at edges

Hinged tin, upright (cigarillos)



CHW covers 65% of front & back surfaces (calculated as if the pack has square edges)

This example shows:

- Front & back: **Layout A: Stacked**
- CHW aligned to top on front of pack and positioned below hinge on back of pack; warning aligned to full width of pack, without extending around rounded edge

Cuboid tin, rounded corner (cigars; cigarillos)



CHW covers 65% of flat front & back surfaces; surface calculated based on flat areas only, **including** the area covered by the lip of the lid when positioned on pack

This example shows:

- Front & back: **Layout A: Stacked**
- CHW aligned to base of lid & full width of flat surface, without extending around rounded edge

On-pack examples:

Cigars, cigarillos & pipe tobacco continued

Vacuum metal tin, round (pipe)



CHW covers 65% of front & back surfaces; each surface is calculated as 1/2 the circumference of the cylinder, **including** the area covered by the lip of the lid when positioned on pack

This example shows:

- Front & back: **Layout C: Side-by-side (extra wide)**
- CHW aligned to base of lid; warnings positioned equidistant from each other

Rectangular tin (pipe)



CHW covers 65% of front & back surfaces

This example shows:

- Front & back: **Layout A: Stacked**
- CHW aligned to top edge and full width of pack, but allowing for positioning on flat surface, without overlapping raised edge, as well as print tolerances/label application tolerances at edges

Shell & slide box, paper (cigars; cigarillos)



CHW covers 65% of front & back surfaces

This example shows:

- Front & back: **Layout A: Stacked**
- CHW aligned to top edge & full width of pack

Single tube, tin (cigars)



CHW covers 65% of front & back surfaces; each surface is calculated as 1/2 the circumference of the tube, **including** the area covered by the lip of the lid when positioned on pack but **not** the rounded tip

This example shows:

- Front & back: **Layout B: Side-by-side**
- CHW aligned to base of the rounded tube tip; due to size, the warnings butt up against each other; positioned to read from top to bottom

On-pack examples:

Cigars, cigarillos & pipe tobacco continued

Bundle (cigar)

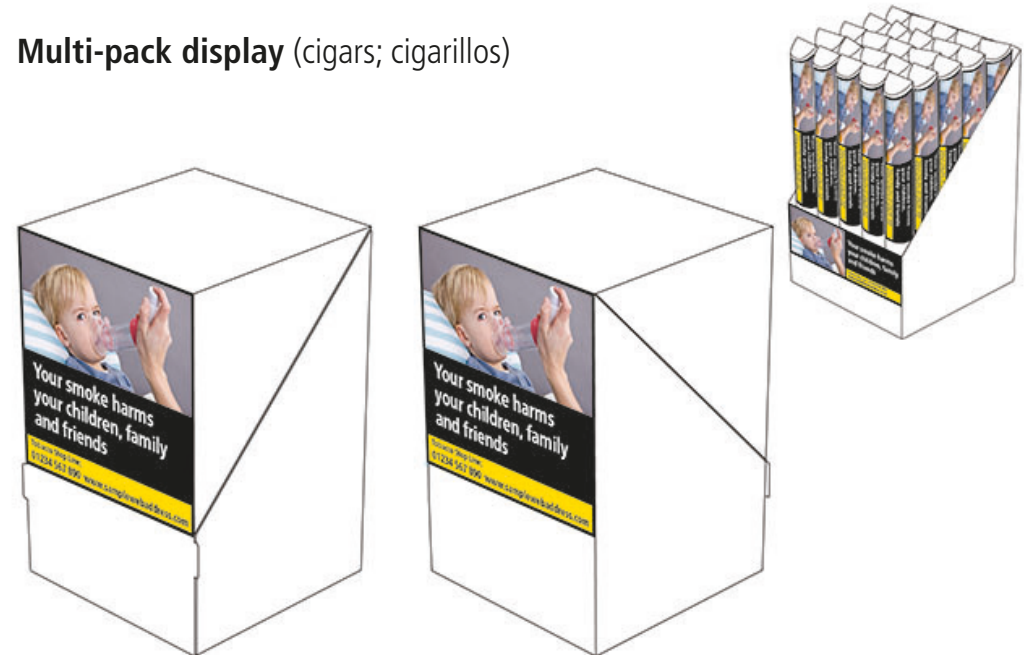


CHW covers 65% of front & back surfaces of card insert/label, as if it had square edges

This example shows:

- Front & back: **Layout A: Stacked**
- CHW aligned to top of insert/label and full width of flat surface, without extending around the rounded edge
- Card insert/label extended to hide any branding on individual cigars, so no names or logos are positioned above the warning

Multi-pack display (cigars; cigarillos)



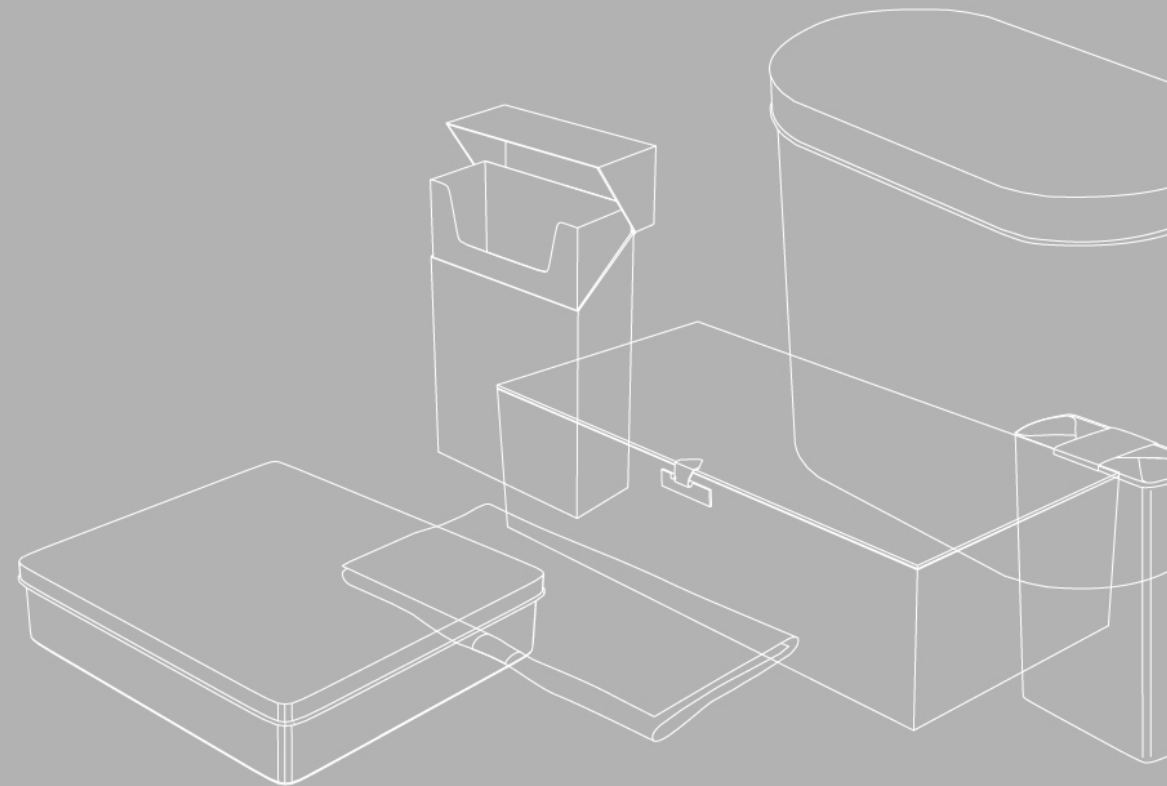
CHW covers 65% of front & back outer surfaces and 65% of front and back inner layer surfaces (visible when used for display and outer layer peeled back and removed)

This example shows:

- Front & back outer layer: **Layout A: Stacked**
- Front inner layer: **Layout B: Side-by-side**
- Back inner layer: **Layout A: Stacked**
- CHW aligned to top and full width of surface in each instance; CHW positioned on both outer layer (used in transit/wholesale) and inner layer, visible when used as display unit in retail

Combined health warnings: Further information

Please contact your Member State competent authority.



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