Office of the Associate Minister of Health

Chair, Cabinet Social Policy Committee

# Smoke-free (Standardisation of Tobacco Packaging and Tobacco Products) Regulations

### **Proposal**

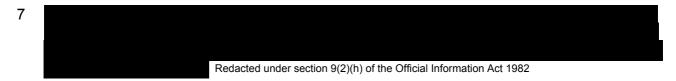
- 1 This paper reports back on recommendations for finalising regulations for standardising tobacco packaging and products following public consultation.
- 2 In November 2015 Cabinet agreed the contents of draft regulations for consultation and directed officials to report to the Social Policy Committee on the consultation results and next steps [SOC-15-MIN-0041 refers].

### **Executive Summary**

- 3 The consultation on draft regulations for standardised tobacco packaging and products has raised a number of issues that I consider should be incorporated into the final regulations.
- 4 The main changes proposed are:
  - 4.1 Aligning the regulation of cigars with Australian regulations with exceptions for brand name and variant size restrictions. For example this will remove the proposals in the draft regulations restricting the number of cigars that can be sold in each pack and will allow the country of manufacture to be printed on the cigar packaging.
  - 4.2 Distinguishing between relatively expensive cigars that are wrapped in intact tobacco leaf and cheaper cigars that are wrapped in reconstituted tobacco leaf. Cigars that are wrapped in intact tobacco leaf will continue to be treated as cigars. Tobacco products wrapped in reconstituted leaf will be treated as cigarettes or cigarillos. Cigars can be sold as single items, cigarettes and cigarillos cannot.
  - 4.3 Allowing pipe tobacco to be sold in tins.
  - 4.4 Changing a number of technical specifications for cigarette and cigarette packaging, including those related to filters and space permitted for displaying brand names.
  - 4.5 Changing the draft regulations to allow for the country of manufacture to be printed on tobacco packages.
  - 4.6 Placing "You can quit smoking" message on tobacco packages, including the bottom 10 percent of the back of cigarette packaging.
  - 4.7 Removing the ability for manufacturers to include a "Ministry of Health Warning" attribution on tobacco packaging.
- New Zealand has required graphic images with associated health warning messages to be displayed on tobacco products since 2008. A new set of health warning messages and

graphic images are being finalised by the Ministry of Health and will be incorporated into the final regulations. This paper seeks authorisation for the Associate Minister of Health to approve the new messages and images for inclusion in the regulations prior to them being considered by the Cabinet Legislation Committee in February 2017.

The next step is for Parliamentary Counsel Office to incorporate the proposed amendments into a new set of regulations to replace the Smoke-free Environments Regulations 2007. I propose to bring regulations into force by Order-in-Council in December 2017 and will issue a public statement outlining the changes proposed following the decision of the Cabinet Legislation Committee.



### Background

- 8 The Smoke-free Environments (Tobacco Standardised Packaging) Amendment Act (the Act) has recently been passed and comes into force by default on 14 March 2018, unless brought into effect earlier by Order-in-Council. Detailed regulations are needed to bring the regime into force.
- 9 The principal objectives of the Act are to reduce the appeal of tobacco products and smoking, particularly for young people; to reduce the wider social acceptance and approval of smoking and tobacco products; to increase the noticeability and effectiveness of mandated health warning messages and images; and to reduce the likelihood of consumers acquiring false perceptions of the harms caused by tobacco products.

### **Consultation results**

Overview of submissions received

- 10 The Ministry of Health received 60 written submissions on the draft regulations. The majority of submissions (43) came from health, community or tobacco control NGOs and academic groups (including 4 from Australia). These submissions were strongly supportive of standardised packaging and several made suggestions to strengthen the regulations to be even more restrictive. Four individuals with health sector links made similar submissions. The Ministry of Health met with the Aspire 2025 group of tobacco control researchers to discuss their proposals in more detail.
- 11 As part of the consultation process the Ministry of Health notified the WTO Technical Barriers to Trade (TBT) Committee. This step provided an opportunity for any genuine trade-related concerns to be raised. No international submission was received following the notification.
- 12 Five submissions were received from large tobacco retail chains and retail organisations. These submissions raised general concerns about introducing standardised packaging and also made specific suggestions to avoid or reduce potential implementation and compliance problems for retailers. The Ministry of Health held a combined meeting with four of the retail sector submitters (Foodstuffs, BP Oil, Retail NZ and the NZ Association of Convenience Stores) to discuss their concerns, and options for addressing them.
- 13 The two main New Zealand tobacco companies (BATNZ and Imperial Tobacco) and the two main specialist cigar companies (Pacific Cigars and Scandinavian Tobacco) made

substantial submissions with some general criticisms, but focusing mainly on amending or relaxing some of the detail of the regulations. The Ministry of Health met separately with each of these four tobacco companies to discuss and clarify matters of technical detail arising from their submissions.

14 Two other international cigarette companies (Philip Morris and Japan Tobacco) made short submissions in general opposition to standardised packaging and did not make specific suggestions. No meetings were held with these two companies.

### Proposed changes and issues for decision

- 15 Having considered the issues raised in submissions and subsequent meetings with submitters, I propose a number of changes to the draft regulations.
- 16 The main changes are:
  - 16.1 Bringing the treatment of traditional cigars in line with the Australian plain packaging regime with the exception of the restriction on the length of the brand name and variant, that is, 50 mm in total length. For example this will allow cigars to be sold in any pack numbers and with country of origin printed on the packs. This change will facilitate compliance by a cigar industry already geared up to supply Australia and New Zealand as a single market.
  - 16.2 Bringing the treatment of pipe tobacco in line with the Australian regulations. This will allow pipe tobacco to be sold in tins. Pipe tobacco is a highly specialised product with a very small market share (0.1% share of the tobacco market in New Zealand).
  - 16.3 Distinguishing more clearly between traditionally manufactured cigars that are wrapped in intact tobacco leaf and cigars that are wrapped in reconstituted tobacco leaf. The small cigars that are wrapped in reconstituted tobacco leaf are cheaper and pose greater risks of experimentation and smoking uptake for young people, particularly as cigars can be sold as a single item.
  - 16.4 Making some adjustments to the technical requirements for cigarettes and cigarette packaging to either improve standardisation or avoid unintended or unnecessary impacts on tobacco suppliers (this includes standardisation of filters, pack sizes, foil and lining colours, etc.)
  - 16.5 Increasing the allowable width for brand names to 50mm (from 35mm proposed in draft regulations) to allow for all brand names that are currently on the market to be able to be printed in the same size font.
  - 16.6 Changing the draft regulations to allow for the country of manufacture to be printed on tobacco packages.
  - 16.7 Placing "You can quit smoking" message on tobacco packages, including the bottom 10 percent of the back of cigarette packaging.
  - 16.8 Removing the ability for manufacturers to include a "Ministry of Health Warning" attribution on tobacco packaging. Officials determined that the health warning messages on the pack were sufficient on their own and the Ministry of Health warning attribution was unnecessary.
- 17 Rationale for the proposed changes above are outlined in appendix A. A summary table that outlines the key changes between the current and proposed standardised packaging regulations is attached as appendix B.

- 18 New Zealand has required, by regulation, the display of graphic images and associated health warning messages on most tobacco packages since 2008. A number of small selling tobacco products, for example nasal snuff, are only required to display text only health warnings. Examples of the current graphic images and associated health warning messages are attached as appendix C.
- 19 The Ministry of Health is in the process of updating the health warning messages and graphic images which need to be incorporated into the regulations. Updating the messages and images has involved consultation with clinical experts, researchers, marketers, lawyers and Māori translation services. An example of a proposed standardised pack can be seen in appendix D.
- 20 Both tobacco industry and public health submitters raised a number of issues or suggestions that were not accepted. These suggestions have been rejected for one or more of the following reasons: out of scope; lack of supporting evidence; insufficient alignment with Australian legislation; not meeting the objectives of the Smoke-free Environments (Tobacco Standardised Packaging) Act; and/or not meeting New Zealand's Framework Convention on Tobacco Control (FCTC) obligations.

### Timing and coming into force

- 21 By default, the Smoke-free Environments (Tobacco Standardised Packaging) Amendment Act comes into force on 14 March 2018. Assuming the regulations are issued on or before 14 March 2017, this would provide at least a 12 month lead-in time after the detail of the regulations is known.
- 22 In addition the Act allows an extra six weeks for old stock to be distributed down the supply chain and a further six weeks for retailers to sell through old stock (note manufacture and importation of non-compliant product must cease when the Act comes into force).
- 23 Tobacco industry and retail submitters assert the need for at least 12 months' notice from the publication of the final regulations, including the supply of high resolution health warning messages and graphic images. However, officials consider that bringing the implementation of standardised packaging in earlier than 12 months is achievable for the tobacco industry.
- 24 I propose that standardised packaging be brought into force by Order-in-Council in December 2017 which is around 3 months earlier than the default timing. The legislation would therefore come into force around 15 months after it was passed and the tobacco industry would have around 9 months lead in time from the passing of the regulations. This implementation timeframe is consistent with implementation timeframes of other countries including Australia.

## Compliance with New Zealand's International Obligations and Litigation Risk: Legal Advice





27 MFAT advises that the WTO dispute settlement panel's decision in the proceeding against Australia is expected to be publically released during the second quarter of 2017, Redacted under section 9(2)(h) of the Official Information Act

### **Trans-Tasman Mutual Recognition Arrangements**

- The Trans-Tasman Mutual Recognition Arrangement (TTMRA) is an arrangement between New Zealand, the Commonwealth of Australia and the Australian states and territories, with the exception of Western Australia. The objective of TTMRA is to minimise or remove regulatory barriers to trade between the two countries, either through mutual recognition of our respective regulatory regimes, or through harmonisation.
- 29 TTMRA is implemented by way of overarching legislation (the Trans-Tasman Mutual Recognition Act 1997) which means that all legislation is subject to the TTMR Act unless specifically excluded. Australia has put in place a permanent exemption under the TTMRA to prevent non-standardised tobacco products that are compliant with New Zealand requirements from being legally sold in Australia.
- 30 For cost reasons Australian-based manufacturers, which are supplying over 80 percent of the New Zealand tobacco market, may choose to rely on the TTMRA and sell Australian-labelled tobacco products on the New Zealand market. These would display the Australian Quitline number, have no te reo Māori warnings and include at least one warning of little relevance to New Zealand. Cost implications or timing issues for the implementation of the new health warning regulations may increase the motivation for the Australian-based manufacturers to do this. However, currently there is no evidence that Australian suppliers have any intention of using the TTMRA to avoid New Zealand-specific requirements.
- 31 Once New Zealand moves to standardised packaging, there will be a stronger incentive for trade in some Australian-compliant products, for example those in different sizes and quantities than what will be allowed in New Zealand. Therefore it may be necessary for New Zealand to also put in place an exemption under TTMRA.
- 32 There are provisions under New Zealand legislation to seek a temporary or permanent exemption, or exclusion for tobacco products, under TTMRA. The Ministry of Health would need to seek the views of the Ministry of Business Innovation and Employment (MBIE) should a temporary or permanent exemption be sought. It should also be noted that a temporary exemption is for 12 months only after which time the mutual recognition principle would continue to apply. Advice from MBIE is that a temporary exemption could be put in place reasonably quickly should a large number of packs with Australian health

warnings appear on the New Zealand market. No immediate action, that is, a temporary or permanent exemption under the TTMRA is proposed in this paper.

### Consultation

33 This paper was prepared by the Ministry of Health, in consultation with MFAT, the Ministry of Business, Innovation and Employment, the Ministry of Justice, the New Zealand Customs Service and the Treasury. The Department of the Prime Minister and Cabinet was informed.

### **Financial Implications**

34 There are no financial implications from this paper. All work required to complete the regulation development process will be met from current departmental resources.

### **Human Rights**

35 The regulations will be made to be consistent with the rights and freedoms contained in the New Zealand Bill of Rights Act 1990 and the Human Rights Act 1993.

### **Legislative Implications**

36 This paper proposes the final policy approvals for a new set of regulations to replace and amend the Smoke-free Environments Regulations 2007 and give effect to the Smoke-free Environments (Tobacco Standardised Packaging) Amendment Act 2016.

### **Regulatory Impact Analysis**

37 The regulatory impact requirements relating to standardised packaging were satisfied before Cabinet made its decision to proceed with legislation [CAB Min (13) 4/6 refers]. A Regulatory Impact Statement (RIS) was submitted when Cabinet agreed in principle to proceed [SOC Min (12) 5/4 refers] and an updated RIS was submitted to support the final decision, following consultation [CAB Min (13) 4/6 refers]. Both have been published.

### **Gender Implications**

38 It is not considered that standardised tobacco product packaging will have any significant gender implications. Women have a slightly lower daily smoking rate than men.

### **Disability Perspective**

39 It is not considered that standardised packaging of tobacco products will have any adverse effect from a disability perspective.

### **Publicity**

40 I intend to release a media statement following Cabinet's approval of the regulations. As with previous Cabinet papers on standardised packaging, I propose that this Cabinet paper and minuted decisions be published on the Ministry of Health website at an appropriate time, subject to any material being withheld as necessary.

### Recommendations

The Associate Minister of Health recommends that the Committee:

- 1 note the Smoke-free Environments (Tobacco Standardised Packaging) Amendment Act (the Act) received Royal Assent on 14 September 2016 and comes into force by default on 14 March 2018
- 2 note the Act requires detailed regulations to be passed before it can come into force
- 3 note the Ministry of Health has undertaken a consultation on a proposed set of draft tobacco standardised tobacco regulations [SOC-15-MIN-0041 refers]
- 4 **agree** that changes be made to finalise the regulations for standardised tobacco packages and products as set out in paragraph 16 and appendix A of this paper
- **agree** to incorporate changes to the draft regulations for standardised tobacco products and packages into a revision of the Smoke-free Environments Regulations 2007, including a new set of health warning messages and graphic images
- 6 **note** that graphic images and associated health warning messages have been required to be displayed on most tobacco product packaging since 2008
- 7 agree that the Associate Minister of Health approve the new set of graphic images and associated health warning messages currently being finalised by the Ministry of Health
- 8 **invite** the Associate Minister of Health to issue instructions to the Parliamentary Counsel Office to prepare new and revised Smoke-free Environments Regulations to reflect the requirements of the Act and the policy outlined in recommendations 4 and 5 above
- 9 direct the Ministry of Health to report to Cabinet Legislation Committee by 28 February 2017 with finalised Smoke-free Environment Regulations for approval
- 10 **note** the commencement clause of the Act gives the Government the ability to bring the legislation into force sooner if it wishes, by Order-in-Council
- 11 **direct** the Ministry of Health to report to Cabinet Legislation Committee by 28 February 2017 with an Order in Council to bring the Act into force in December 2017
- 12 **note** the Associate Minister of Health's intention to release a media statement following Cabinet's approval of the regulations
- 13 **note** the Associate Minister of Health's intention to publish this Cabinet paper and the summary of submissions on the Ministry of Health's website once Cabinet's decisions are publicly announced.

Authorised for lodgement

Hon Peseta Sam Lotu-liga Associate Minister of Health

### Appendix A: Proposed changes to draft standardised tobacco regulations

### Proposal in the draft Proposed changes to the Issues raised by submitters draft regulations regulations **Cigars** Restrictions on The proposed regulations would Cigars are subject to the same quantities and types of create significant implementation standardised packaging and compliance issues for the packaging that cigars requirements as in Australia, may be sold in, for companies that supply the relatively particularly with regard to example cigars maybe high-cost and small-scale traditional types and sizes of packaging be sold in a pack cigar market in New Zealand. and quantities in which cigars containing only 5 or 10 many be sold. There is little evidence that importers cigars. of traditional cigars are actively Bring the treatment of marketing their products to young traditional cigars more fully in people or experimental smokers and line with Australian plain traditional cigar packaging has packaging. This would remained essentially unchanged. facilitate ready compliance by a cigar industry already In contrast, cigarette and loose geared up to supply Australia tobacco companies have regularly and New Zealand as a single innovated their product and market (note the regulations packaging designs. would still provide for some country-specific differences, such as use of te reo Māori. the New Zealand Quitline number and any other minor differences that are necessary as a result of other general requirements or proposed changes). Cigarillos and small cigars Treat all cigars the There are a number of different Products that are treated as same (if they are products on the market that are traditional cigars are subject to wrapped in tobacco leaf known or referred to as cigars. the requirements for cigars or the leaf of another However some cigars are wrapped (including the possibility of plant). in reconstituted rather than intact sale in small quantities). tobacco leaf therefore do not meet Narrow the definition of cigars the criteria for the definition of cigars to only include products under the Act. wrapped in intact tobacco leaf (not the leaf of other plants) Cigars that are wrapped in reconstituted tobacco leaf are mass and with no filter tip. produced and have more potential Clarify that any tobacco for harm as they are cheaper and product with a filter tip and/or may be more appealing to young wrapped or enclosed in people. reconstituted tobacco leaf, or some other leaf (as is the case for bidis), is treated as a cigarette.

Proposal in the draft regulations	Issues raised by submitters	Proposed changes to the draft regulations
Pipe tobacco		
Treat pipe tobacco the same as loose tobacco and limit the packaging type to rectangular pouches made up of soft plastic.	The majority of pipe tobacco sold in New Zealand is manufactured by the same company in Denmark and comes in sealed tins to ensure moisture control. It is not possible to repack the tins in other packaging without compromising the integrity of the product.	Allow pipe tobacco to be sold in tins.
	Pipe tobacco is a very small proportion of the loose tobacco market (0.1 percent of the tobacco market). There is no evidence that young smokers experiment with these products.	
Technical specifications	s for cigarettes and cigarette packagi	ng
Filters		
The terms filter and filter tip are not defined either in the Smoke-free Environments Act 1990 or the Smoke-free Environments Regulations 2007, nor in the draft standardised tobacco regulations.	A number of new filter innovations including hollow filters and capsule/crush filters have entered the New Zealand market. A wide range of filter innovations is available in some overseas markets. Most filter innovations are used for marketing purposes.	Clarify that the paper enclosing a filter tip may be white or imitation cork only, but that the filter itself should be made of plain white material, without printing or embellishments of any kind.
Space permitted for displa	aying brand and brand variant names	
Brand names and variant names on cigarette packs must be no wider than 35mm.	Some brand names currently in the market are wider than 35mm.	Increase the permitted width for brand names from 35mm to 50mm to accommodate all the existing brand names that are currently available in New Zealand market.
Capitalisation of brand na	mes	
A brand name cannot include capital letters.	There is one brand name currently on the market that includes 3 capital letters.	Allow the use of three capital letters in a brand name.
Inner pack lining and foil of	colour	
Pack lining and inner foil to be coloured in pantone 448c.	There is no ability to produce foil or inner packs in pantone 448c. There is difficulty with food grade ink colouring.	Inner pack to be white and the foil to be silver coloured and could have a white paper backing.

Proposal in the draft regulations	Issues raised by submitters	Proposed changes to the draft regulations
Cigarette pack and stick s	ize	
Limit the size of the cigarette packs.	One of the manufacturer's packs is slightly larger than the size allowed in the draft regulations; the machinery that is used to produce these packs produce only that size.	Increase the upper pack size limit slightly to accommodate the larger packs from one of the manufacturers.
Other marks related to ma	nufacturing, tracing and shipping produ	cts
Restrict product tracing numbers and codes that are printed to a few preapproved ones. This is to prevent these markings being used as product marketing tools.	Some of the tobacco manufacturers have stated that they use a wider range of manufacturing and tracing markings (such as several variations of alphanumeric coding) and a number of methods to create them (embossing, laser printing and ink printing). Manufacturers stated that these markings are necessary for manufacturing, tracing and shipping products.	Allow more flexibility regarding the markings that are associated with product manufacturing, tracing and shipping products.
Bar codes must be in pantone cool grey 2C on a pantone 448c background.	While it is possible to use these colours in a bar code there may be an issue relating to increasing numbers of scanning errors – possibly leading to increased transaction times.	Bar codes to be printed in black on a white background (industry standard).
Country of origin		
No allowance for country of origin to be displayed on any tobacco products packaging.	Cigar importers stated that the country of origin is an important characteristic of cigars and plays an important role in customers' purchase decision.  Some cigarette manufacturers stated that they would like to display the country of origin on the packages. This would allow the	Allow non-mandatory display of country of origin on all tobacco packages.
	imported products to be distinguished from locally made products.	
Quit messages		
Quitline message is on the front and back of the pack.	Some submitters stated that there was not enough quit messages displayed on the packages.	A 'You can quit smoking' message is displayed on tobacco products including on the bottom 10 percent of the back of a cigarette pack.

# Appendix B: Summary comparison of current and proposed Standardised Packaging Regulations for cigarette packaging

For a visual comparison of the current cigarette pack to the proposed pack see photo attached as Appendix F.

Current regulations (Smoke-free	Proposed regulations (Smoke-free
Environments Regulations 2007)	(Standardisation of Tobacco Packaging and
	Tobacco Products)
Graphic images/warnings	Graphic images/warnings
Front of pack size: covers 30%	Front of pack size: covers 75%
Back of pack size: covers 90%	Back of pack size: covers 100%
14 graphic images are rotated annually and	14 graphic images (most will be new) rotated
have been on packs since 2008	annually – the front picture will be larger, the
(For current set of images see Appendix C)	back image is the same size as the current regulations
Trademarks (including brands, logos)	Graphic images/text warnings
Any trademarks allowed in any area that is not part of graphic image or text warning area	Restricting brand name to a standardised font, colour and maximum size limit
	Width of brand name (eg Pall Mall) can only be 50mm maximum
	Width of brand variant name (eg Red) can only
	be 35mm maximum
Colours and font sizes	Colours and font sizes
Any colour and font size is allowed outside of	Restricting colours to prescribed colours only
the mandated graphic image and text warning area	Restricting all text to prescribed fonts and sizes
Number of cigarettes allowed per pack	Number of cigarettes allowed per pack
Minimum number of 20 cigarettes per pack but	Restricting packs to either 20 or 25 cigarettes
no maximum	per pack
Size of cigarette sticks	Size of cigarette sticks
No restrictions on size or length of cigarette	Diameter of a cigarette stick restricted to 7-
sticks	9mm
	Length of a cigarette stick restricted to 95mm
Cigarette stick colour and filters	Cigarette stick colour and filters
No restriction on colour of stick or filter	Cigarette stick must be plain white or plain
	white with an imitation cork tip. Filter is
Oth an magnificate	standardised ie cylindrical with flat ends
Other markings	Other markings
Allowed in any area that is not part of graphic	Not allowed except for those outlined in the
image or text warning	regulations eg printing markers, alphanumeric codes for tracking and tracing, address, country of origin
Pack material	Pack material
Any material allowed	Only cardboard allowed and the packaging is prohibited from having any other design features eg embossing

### Appendix C: Current graphic images/warnings on cigarette packets

Warning

Image on front

Image on back

Smoking causes blindness

KA KĀPŌ KOE I TE MOMI HIKARET





Smoking causes gangrene

KA PĀNGIA KOE I TE KIKOHUNGA I TE MOMI HIKARETI



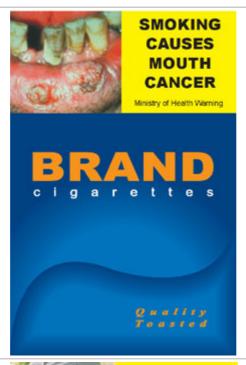


### Image on front

### Image on back

Smoking causes mouth cancer

KA MATE PUKUPUKU Ō TE WAHA KOE I TE MOMI HIKARETI





You are not the only one smoking this cigarette

ĒHARA KO KOE ANAKE KEI TE MOMI I TĒNEI HIKARETI



# YOU ARE NOT THE ONLY ONE SMOKING THIS CIGARETTE ÉHARA KO KOE ANAKE KEI TE MOMI I TÉNEI HIKARETI

Smoking during pregnancy increases the risk of miscarriage, stillbirth, premature birth and the risk of Sudden Infant Death Syndrome (SIDS)

You CAN quit smoking. Call Quitline 0800 778 778, or talk to a quit smoking provider.

BRAND

### Image on front

### Image on back

Over 80% of lung cancers are caused by smoking

TE NUINGA O NGĀ MATE PUKUPUKU Ā PŪKAHUKAHU NĀ TE MOMI HIKARETI





Tobacco smoke is poisonous

HE PAIHANA TE AUAHI HIKĀ



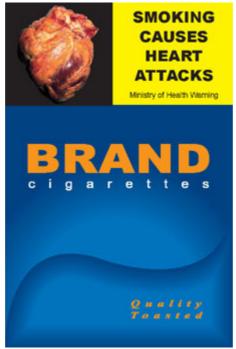


### Image on front

### Image on back

Smoking causes heart attacks

KA MĀUIUI TŌU NGĀKAU I TE MOMI HIKARETI





Smoking can make you impotent

KA KAHAKORE TE URE I TE MOMI HIKARETI





### Image on front

### Image on back

Smoking is highly addictive

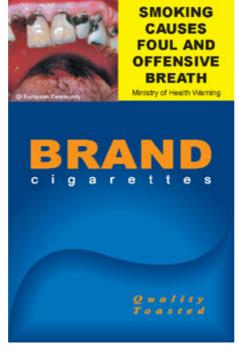
KA TINO WAREA TE TANGATA I TE MOMI HIKARETI





Smoking causes foul and offensive breath

KA HAUNGA, KA KEHAKEHA TÕU HĀ I TE MOMI HIKARETI





### Image on front

### Image on back

Your smoking can harm your kids

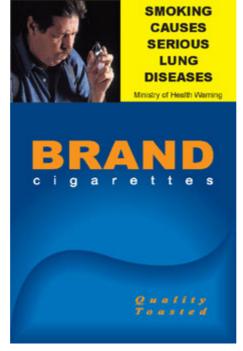
KOI PĀNGIA I TE MATE ŌU TAMARIKI I TŌU MOMI HIKARETI

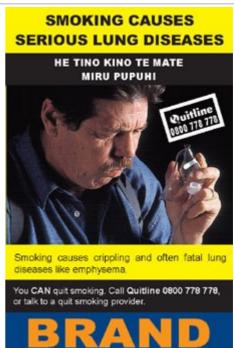




Smoking causes serious lung diseases

HE TINO KINO TE MATE MIRU PUPUHI





### Image on front

### Image on back

Smoking more than doubles your risk of stroke

KA TINO KAHA RAWA AKE TŌU PĀNGIA ANA I TE MATE RORO IKURA I TE MOMI HIKARETI



SMOKING MORE THAN DOUBLES
YOUR RISK OF STROKE

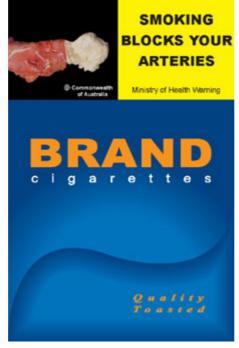
KA TINO KAHA RAWA AKE TOU PANGIA ANA
I TE MATE RORO IKURA I TE MOMI HIKARETI

COMMISSIONE
STROKES can cause permanent paralysis, inability to speak, disability and death,

You CAN quit smoking, Call Quittine 0800 778 778, or talk to a quit smoking provider.

Smoking blocks your arteries

KA AUKATIHIA ŌU IOIO TOTO I TE MOMI HIKARETI





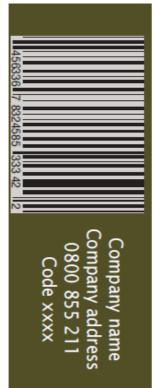
### Appendix D: Proposed front, back and side images of a standardised cigarette pack

Front



Back





Side 1 Side 2

20

### Appendix E: Current versus proposed "standardised" cigarette packs



**Current packaging** 

Proposed packaging