

Tobacco control playbook

Do pictorial health warnings
and plain packaging work?

About this update

The tobacco epidemic is one of the greatest public health threats and requires a comprehensive approach with robust tobacco control measures.

The WHO European Region has made remarkable progress in tobacco control over recent decades, driven by the adoption and implementation of the WHO Framework Convention on Tobacco Control (WHO FCTC). Yet, tobacco use and its devastating health consequences remain unacceptably high. The fight against tobacco is further complicated by the industry's relentless efforts to undermine effective policies – deploying increasingly aggressive and deceptive strategies.

To counter these tactics, policy-makers need clear, evidence-based arguments. In response to this need, the WHO Regional Office for Europe developed and published the Tobacco Control Playbook in 2019. This playbook serves as a resource for those engaged in tobacco control, providing insights into industry tactics and equipping governments and public health advocates with well-founded arguments to counter industry influence. It dismantles common industry myths and presents a compelling, evidence-driven narrative that directly challenges the opposition to effective tobacco control measures.

Since 2019, the landscape of tobacco control has continued to evolve. More countries have strengthened their policies and successfully countered industry interference, while market shifts have introduced new tobacco and nicotine products, increasingly targeting young people. These developments underscore the need to update the playbook with the latest evidence, experiences and good practices.

This document is the third¹ in a series of revised and updated arguments under the playbook umbrella. We hope these updates will serve as a valuable tool for policy-makers, advocates and the public, reinforcing tobacco control efforts across the Region and ultimately reducing tobacco-related harm.

¹ The first two revised arguments, *Smoke-free environments protect health and benefit the hospitality sector (1)* and *Comprehensive smoke-free legislation: an essential component of tobacco control strategy (2)*, were published in April and June 2025, respectively.

What is the issue?

The tobacco industry strongly resists pictorial health warnings and plain packaging with delay and forestalling tactics, litigation and claims that these measures are not effective, “excessive”, or will result in unwanted effects such as illicit trade or retailer disruption.

What is the evidence for concern?

- Tobacco packaging is a crucial marketing medium for tobacco companies, especially as other forms of tobacco advertising are increasingly restricted (3).
- Tobacco companies use attractive pack designs, colours and branding to mislead people into believing that some variants, such as “lights” or “menthols”, are less harmful even though they carry the same health risk, and to make their products more appealing to youth (3,4).
- The tobacco industry uses pack innovations to bypass regulations and preserve appeal. These include technical features such as slip cases, limited edition designs and pack textures that visually or tactically enhance the product’s appeal, particularly where regulations leave loopholes (5).
- The packaging also serves as a behavioural cue to reinforce brand loyalty and habitual use. Removing brand imagery can disrupt this reinforcement mechanism, supporting cessation efforts (6).
- The tobacco industry has strongly opposed pictorial health warnings and plain packaging (7). Often via front groups and third parties, such as business and retailer associations, the industry argues for no warnings or inconspicuous, vague text warnings, claiming that these are just as effective and less excessive than text-only warnings. They also argue that plain packaging will cause illicit trade or disruption to retailers.
- In countries where plain packaging has been adopted, the tobacco industry lobbies for longer sell-through periods and uses these to stall the introduction of plain packs (8).
- The tobacco industry attempted to use litigation to fight plain packaging in several countries globally, including Australia, France, Ireland, Norway, the United Kingdom, Uruguay and the European Union, but the industry lost all of these cases (9).

What is the reality?

- Pictorial health warnings are, compared to text-only warnings, more salient and more effective in deterring smoking (10,11), including in youth (12). Pictorial warnings clearly communicate the health risks to people who may not understand text warnings, such as children or people with a low literacy level (10). Those exposed

to pictorial health warnings report a higher awareness of smoking-related diseases such as lung cancer and heart disease (13).

- Although there is evidence that certain types of pictorial health message may be effective across different cultural contexts (14), it is important for each country to test the impact of different types of message on their own population to maximize their effectiveness and to rotate the warnings, as they tend to lose their effect over time (15).
- As of December 2023, 25 countries, including 13 countries in the WHO European Region (Belgium, Denmark, Finland, France, Georgia, Hungary, Ireland, Israel, Netherlands (Kingdom of the), Norway, Slovenia, Türkiye and the United Kingdom), had adopted plain packaging since it was first introduced in Australia in 2012 (16).
- Evaluation studies from these countries show that plain packaging increases the salience of graphic health warnings, reduces tobacco product appeal and deters smoking among both adults and youth (17–24). In Australia, an independent post-implementation review found that, within the first three years, a quarter of the decline in adult smoking prevalence could be attributed to plain packaging (25).
- Although the tobacco industry predicted that plain packaging would cause disruption to retailers, this did not occur. Compliance among retailers was high, and any delays in retrieving the correct pack for consumers was short-lived (8).
- Although the tobacco industry predicted that plain packaging would cause illicit trade, industry-independent studies found no evidence that plain packaging led, or could lead, to increases in illicit trade (26).
- The tobacco industry lobbies for long sell-through periods, such as 12 months, to delay implementation but long sell-through periods are not necessary. Countries such as Australia, New Zealand and Singapore have successfully phased in plain packaging with a short sell-through period of 3 months or less (8).
- Pictorial health warnings and plain packaging laws should cover all smoked and smokeless tobacco products, as well as e-cigarette devices and e-liquids, to encourage users to quit instead of switching to other nicotine products and to ensure that consumers are aware of the health risks. In Netherlands (Kingdom of the), for example, the plain packaging law initially covered only tobacco products, but was expanded in 2025 to also cover e-cigarettes to deter their use among youth (27).
- In countries with plain packaging, tobacco companies have exploited loopholes in the law by introducing new cigarette filter designs, flavours, pack inserts, different pack and stick sizes, and special pack features such as embossed designs, foils or more evocative or descriptive brand and variant names. Such features appear to target youths who are less brand loyal and more drawn to product novelties such as flavour capsules (28). It is therefore important to ensure that the law is carefully worded to avoid loopholes and to standardize design of the tobacco product as well as the pack (8).

Key messages

- Implementation guidelines for Article 11 of the WHO FCTC, on packaging and labelling of tobacco products (29), state that pictorial health warnings on tobacco packs should be clear, visible, legible, positioned on the front and back, cover at least 50% of the display area and be periodically rotated to remain salient. The guidelines also recommend Parties to consider adopting plain packaging.
- Implementation guidelines for Article 12 of the WHO FCTC, on education, communication, training and public awareness, stress the importance of educating everyone on the harms of tobacco use, taking into account differences in education, literacy, socioeconomic status and age (30). Pictorial warnings are essential in properly communicating the risks to people with a low education or literacy level, children, or anyone else who may not understand text warnings.

Case study: Georgia's plain packaging battle

In May 2017, the country of Georgia adopted a comprehensive tobacco control law that expanded smokefree legislation, imposed tobacco marketing restrictions, banned tobacco retail within 50 metres of educational institutions and mandated plain packaging for all tobacco products, including heated tobacco products (28).

Although the plain packaging mandate was initially set to take effect in January 2018, the tobacco industry lobbied heavily to delay its implementation. Industry representatives pushed for four amendments to postpone the mandate, an amendment to exclude heated tobacco products, and another amendment to exempt all tobacco products except cigarettes and roll-your-own tobacco. These lobbying efforts were channelled through local organizations, notably the Business Ombudsman Office and the Business Association of Georgia (BAG), which includes Philip Morris Georgia and Japan Tobacco International among its members. BAG argued that Georgia's plain packaging law was "radical," "significantly stricter than European Union countries," and would "inevitably lead to further narrowing of organized business in the relevant market and indirect encouragement of illegal imports" (29). However, these claims lacked evidence, as 13 European countries have implemented plain packaging (14), and research has shown no link between plain packaging and increased illicit trade (24).

Despite relentless industry opposition, Georgia's plain packaging mandate finally came into effect on 1 October 2024, more than seven years after its adoption, with a six-month grace period until 1 April 2025 to clear stocks of old packs (30).



The experience of Georgia highlights the persistence required to implement strong tobacco control policies in the face of industry resistance. Local advocates emphasize the importance of:

- not giving up: even in the face of industry pressure, persistence is key;
- using international examples and evidence: when local resources are limited, it is helpful to leverage on the research and experiences from other countries;
- being prepared in advance: developing policy packages ahead of time helps to counter industry pushback; and
- building a strong support network and champions: Georgia's success was bolstered by support from the Georgia National Center for Disease Control and Public Health, key members of parliament and the health committee who championed the legislation, a local nongovernmental organization (the Tobacco Control Alliance) and the World Health Organization.

Georgia's journey underscores that with determination, evidence-based advocacy and strategic alliances, even the most aggressive industry opposition can be overcome.

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