Big Tobacco, Tiny Targets

Tobacco Advertisement,
Sales, Product Displays, and
Purchase Incentives Around
Kindergartens, Primary, and
Secondary Schools











Campaign for Tobacco Free Kids (CTFK)

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Executive Summary

Between December 4th, 2017 and January 9th, 2018, Field Agents performed visual surveys of tobacco advertising, sale, displays, and purchase incentives located within a 100-meter radius of children's school playgrounds, kindergartens, primary, and secondary schools in 8 cities in Pakistan. The areas included in the study were: Islamabad, Murree, Larkana, Peshawar, Hafizabad, Pindi Bhattian, Jalalpur Bhattian, and Shakar Dara.

Surveyors visited a total of 133 schools and found the following in Pakistan:

- **a.** Vendors sell tobacco products around schools. (Investigators observed 268 points of sale selling tobacco products around schools. Groceries were the most common form of vendors observed, followed by street vendors and kiosks.)
- b. Multinational tobacco companies sell tobacco products around schools. (Investigators documented that, of the 268 tobacco points of sale observed, 65.3% carried British American Tobacco brands, 27.1% carried Philip Morris International brands, and 6.5% carried Japan Tobacco brands.)
- c. Vendors advertise tobacco products around schools. (Investigators observed tobacco advertising at 89% of the 268 tobacco points of sale observed.) Posters were the most common form of advertising at 87.2% of the 268 tobacco points of sale observed.

- **d.** Vendors sell cigarettes and bidis via single sticks, making these products cheap and accessible to children and youth around schools. (Investigators observed single stick sales in 99.5% of the 268 tobacco points of sale observed.)
- e. Vendors display tobacco products in ways that are appealing to children and youth. (Investigators documented that, of the 268 tobacco points of sale observed, 95% of displays were at 1 meter a child's eye level; 62% of the points of sale had no visible health warning; and 94% of displays were beside candy, sweets and toys items marketed to children.)
- Vendors utilize sales techniques such as discounting products and distributing free samples. (Investigators documented that, of the 268 tobacco points of sale observed, 27.2% offered price discounts and 8.1% offered free tobacco products.

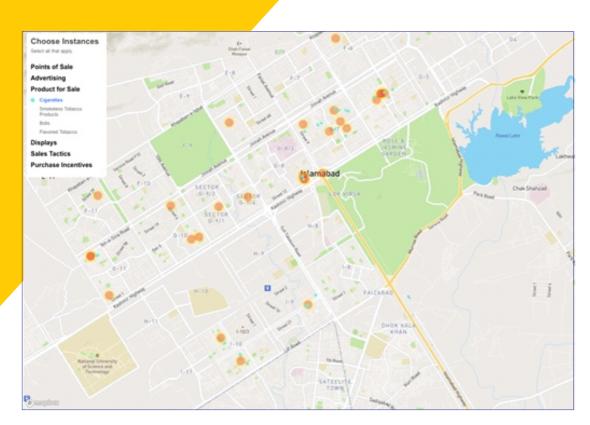


Fig 1.Map of Survey locations throughout Islamabad, Pakistan

Our investigation revealed that Pakistan's children are bombarded with tobacco marketing and product accessibility immediately around their schools. Tobacco companies commonly advertise their products in stores near schools and use product displays at stores and kiosks designed to be attractive to children. Advertising is often placed at a child's eye level, and tobacco products are placed near candies, snacks, and school supplies. The placement provides easy access to tobacco products to school children.

The way tobacco products are packaged and displayed are also important marketing tools for the tobacco industry. Backlighting, bright colors, and interesting materials are all used to make tobacco product displays more attractive to children. These tobacco industry advertising and product placement techniques were found in the field surveys.

Not surprisingly, Philip Morris and Pakistan Tobacco Company products were the most commonly observed around schools in our investigation and they are also the most vocal lobby against the restrictions on tobacco advertising in Pakistan.

To strengthen the current law and otherwise combat tobacco industry targeting of children and youth, this report recommends the following:

- 1. The government of Pakistan must enforce its current tobacco control legislation, including:
 - a. the Prohibition of Smoking and Protection of Non-Smokers Ordinance, 2002 which bans sales of tobacco products within 50 meters of schools; and
 - b. the following SROs issued under the 2002 Ordinance:
 - i. SRO 1086 (I)/2013 which restricts point of sale advertising;
 - ii.SROs 277(I)/2011 and (I)/2018 which prohibit the sale of single sticks of cigarettes.
- 2. The government also must strengthen Pakistan's tobacco control legislation, to include a ban on <u>all</u> forms of point of sale tobacco advertising and point of sale tobacco product display.
- 3. The government should reconstitute and activate the Committee on Tobacco Advertisement Guidelines (CTAG) on a permanent basis and task the CTAG with continuously reviewing and updating Pakistan's tobacco control legislation as it relates to tobacco industry advertising, promotion and sponsorship.
- 4. Municipal authorities should license tobacco vendors. Regulating tobacco vendors can aid enforcement of Pakistan's tobacco control legislation.
- 5. Compliance with Pakistan's tobacco control legislation should be a condition of the tobacco vendor license where violations of the laws constitute a violation of the license itself.
- 6. Municipalities should consider licensing only exclusive tobacco shops where tobacco products solely can be sold. This will reduce exposure to tobacco products by children and non-users who will not frequent such stores.

Background

The Campaign for Tobacco-Free Kids is launching an international campaign focused on confronting predatory and often illegal tobacco marketing practices that target youth. This campaign will engage the broader public to become advocates and activists who are educated and activated on how to expose these practices. By contributing to a crowd-sourced knowledge base, they will help build future campaigns backed by evidence of these instances.

Methodology

Kobo Toolbox

Tiny Targets field agents were equipped with a mobile reporting form to document instances of tobacco companies advertising, selling, displaying, or incentivizing the sale of tobacco products within a 100-meter radius from 133 schools in 8 cities in Pakistan. The cities included in the study were: Islamabad, Murree, Larkana, Peshawar, Hafizabad, Pindi Bhattian, Jalalpur Bhattian, and Shakar Dara.

The mobile form automatically captured the date, geographic coordinates, and data collector name for each record uploaded to the dataset. The order of questions and format of response options were designed to facilitate rapid and discrete observation by data collectors. The data reported in this study reflects the reports they submitted from November 21st, 2017 until January 9th, 2018.

School Data

The schools in this study were reported by Tiny Targets field agent data collection. Data collectors observed and recorded 268 tobacco points of sale (POS) around 133 schools in 8 cities throughout Pakistan.

Mapping

Data gathered from the Kobo Toolbox was then mapped using MapBox, an open source mapping platform for custom designed maps. Mapbox, was used to define the sampling area radium of 100 meters surrounding each school. Circles were drawn to represent the radius 100 and 150-meters from a school.

To view all maps, go to http://tinytargets.grassriots.com/

Each school then had two radii drawn to measure the school's distance from recorded tobacco advertising, sales, displays, and purchase incentives. Radii were drawn 100m (in orange) and 150m (in yellow) from schools. The scale of the maps is according to the following image:

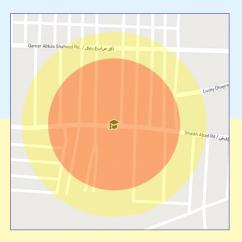


Fig 2. Map showing the radii covered around a school in Peshawar, Pakistan.

Results

Tobacco Brands Sold, Advertised, or Displayed

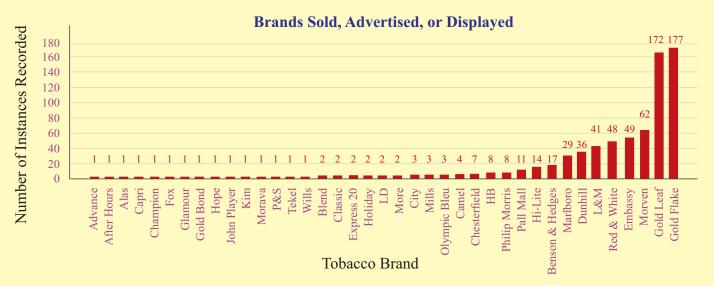


Fig 3. Instances of tobacco brands sold, advertised, or displayed recorded in Pakistan.

• Our investigators recorded 719 instances of 39 tobacco brands being sold, advertised, or displayed within 150 meters of schools and school playgrounds where the maximum instances were of the brand Gold Flake (177 or 24.6%) and Gold Leaf (172 or 23.9%).

• Other brands observed around schools and school playgrounds include: Marven (62 or 8.62%), Embassy (49 or 6.8%) and Red and White (48 instances or 6.6%).

Pakistan's tobacco control legislation bans sales of "cigarettes or any other such smoking substance" within 50 meters of schools.

The legislation prohibits tobacco advertising through posters, banners, onstore boards, or fascia affixed outside a shop, kiosk, or mobile trolley. Additionally, the legislation prohibits tobacco advertising on home billboards,

whether fixed or mobile. The legislation does not prohibit other forms of tobacco advertising inside the points of sale.

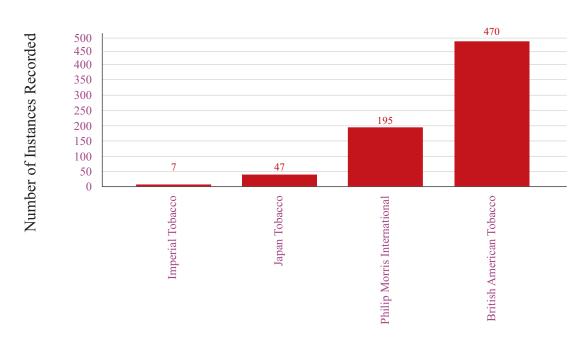
The legislation does not prohibit the display of tobacco products at the point of sale.



Fig 4 & 5. Images of Tobacco Brands Sold, Advertised, or Displayed in Larkana, Pakistan

Big Tobacco Company Brands Sold, Advertised, or Displayed

Big Tobacco Company Advertising



Big Tobacco Companies Recorded

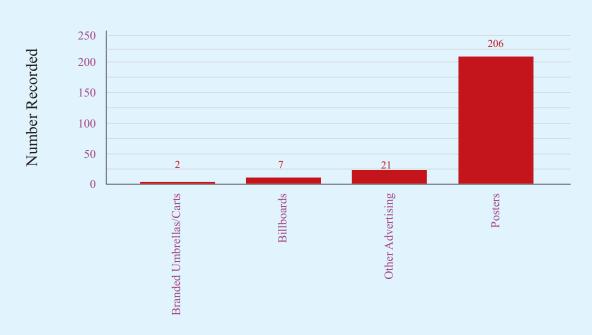
Fig 6. Big Tobacco parent companies' tobacco brands sold, advertised, or displayed in Pakistan.

By a significant margin, British American Tobacco (65.3%) was the most common Big Tobacco company advertising at the 268 tobacco points of sale observed around schools in Pakistan. Philip Morris International (27.1%) and Japan Tobacco (6.5%) were the other multinational tobacco companies observed to be advertising around schools and school playgrounds in Pakistan.

- Pakistan's tobacco control legislation bans sales of "cigarettes or any other such smoking substance" within 50 meters of schools.
- The legislation prohibits tobacco advertising through posters, banners, on-store boards, or fascia affixed outside a shop, kiosk, or mobile trolley. Additionally, the legislation prohibits tobacco advertising on home billboards, whether fixed or mobile. The legislation does not prohibit other forms of tobacco advertising inside the points of sale.
- The legislation does not prohibit the display of tobacco products at the point of sale.

Tobacco Advertising around Schools

Tobacco Branded Advertising



Type of Advertising Recorded

Fig 7. Tobacco branded advertising instances recorded in Pakistan.

Our investigators recorded all advertising observed around the 268 tobacco points of sale around schools and school playgrounds. 89% of the tobacco points of sale contained advertising. Posters were the most common form of advertising (87.2%).

- vPakistan's tobacco control legislation bans sales of "cigarettes or any other such smoking substance" within 50 meters of schools.
- The legislation prohibits some but not all advertising at the point of sale.







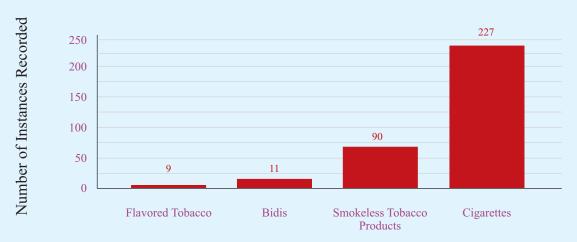


Figs 8, 9, 10 and 11. Tobacco branded posters 100m from schools Hafizabaad, Pakistan



Figs 12. Kiosk, selling sweets and tobacco products near school in Murree, Pakistan.

Tobacco Products for Sale



Tobacco Product For Sale

Fig 13. Instances of tobacco products for sale recorded in Pakistan.

Our investigators recorded all tobacco products available for purchase around schools and school playgrounds in Pakistan. The most common tobacco products available for purchase in these areas were cigarettes (67.3%), followed by smokeless tobacco products (26.7%) and then followed by bidis (3.2%).

Pakistan's tobacco control legislation bans sales of "cigarettes or any other such smoking substance" within 50 meters of schools.

Tobacco Points of Sale





Tobacco Point of Sale Observed

Fig 14. Points of sale where tobacco products are sold, advertised, or displayed recorded in Pakistan.

Our investigators recorded all points of sale where tobacco products were available for purchase around schools and school playgrounds in Pakistan. Investigators found 268 such points of sale. The most common and popular types of points of sale in these areas were small Groceries, followed by street vendors and Kiosks.

Pakistan's tobacco control legislation bans sales of "cigarettes or any other such smoking substance" within 50 meters of schools.

Chose Instances Points of Sale Department Points of Sale Department Product for Sale Displays Sales Tactics Purchase Incentives Purchase Incentives Fig 15. Map of Small Grocery Stores in Peshawar, Pakistan

Fig 16. A Small Store displaying tobacco products at child's eye level in Peshawar, Pakistan

Map of Street Vendors

Fig17: Street Vendors selling tobacco near schools in Murree, Pakistan





Map of Kiosks

Fig 18. Kiosks selling tobacco products near schools in Hafizabad.

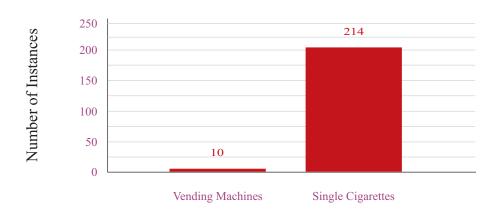
Map of Supermarkets

Fig 19. Supermarkets selling tobacco products near schools in Larkana



Tobacco Sales Tactics

Tobacco Sales Tactics



Type of Sales Tactic

Fig 20. Tobacco sales tactics in Pakistan.

Our investigators observed several different sales tactics around schools and school playgrounds in various locations in Pakistan that would be appealing to youth. Overwhelmingly, the most common tactic was that of selling single cigarettes (99.5% of the 268 tobacco points of sale observed). The availability of single cigarettes around schools makes it cheap and easy for school children to access tobacco.

- Pakistan's tobacco control legislation prohibits sales of single sticks of cigarettes.
- The legislation also bans sales of "cigarettes or any other such smoking substance" within 50 meters of schools.

Tobacco Displays

"Eye Level is Buy Level' because items placed at eye level are more likely to be purchased than those on higher or lower shelves."- British American Tobacco (BAT)

Tobacco Displays at a child's eye level (approximately 1 meter) were observed in 95% of the 268 tobacco points of sale observed around schools in Pakistan.

95%

of tobacco displays were at a child's eye level (1m)

62%

of tobacco displays had no health warnings visible

94%

of tobacco displays were beside candy or toys



Map of Tobacco Displays



Fig 24. Tobacco product displays near schools in Pindi Bhattian.

Map of Tobacco Displays at Child Height



Fig 25. Tobacco product displays at a child's eye level (1 meter) observed near schools in Islamabad

- Pakistan's tobacco control legislation bans sales of "cigarettes or any other such smoking substance" within 50 meters of schools.
- The legislation does not prohibit the display of tobacco products at the point of sale.

Map of Tobacco Displays with Health Warnings Visible

Compare the maps below of schools in Larkana – note the disparity between tobacco product displays at a child's eye level (32 instances) and the number of times visible tobacco health warnings were observed (2 instances).

- Pakistan's tobacco control legislation bans sales of "cigarettes or any other such smoking substance" within 50 meters of schools.
- The legislation does not require health warnings to be displayed at the point of sale.





Fig 26 and 27. Map of Kiosks where Tobacco products displayed with visible health warnings and at the eye level of a child (1 meter) observed near schools in Larkana.

Map of Tobacco Products Displayed Near Candy, Toys

Choose Instances
Select all that apply

Points of Sale
Advertising
Product for Sale
Displays
Sales Tactics
Purchase Incentives
Price Discourits
Fire Tobscore Products
Subsityers Mest to Candy,
Toys
Odds (Fire or with Purchase)
Sponsore United Edition
Packs
Instation Cigneties Candes
or Toys
Sonoriere Events
Conteste or Competions
Loyalty, Reward Scheme
Brand Representative

Packs

Grand Trunk Road

Orand Trunk Road

Fig 28. Tobacco products displayed near candy and toys near schools in Peshawar.

Tobacco Purchase Incentives

Our investigators observed incentives for tobacco product purchases and retailer sales around schools and school playgrounds in Pakistan. The most common tactics included: tobacco products displayed next to candy and/or toys (64.6%) and price discounts for tobacco products (27.2%); followed by distribution of free tobacco products (8.1%).

- Pakistan's tobacco control legislation bans sales of "cigarettes or any other such smoking substance" within 50 meters of schools.
- The legislation prohibits some but not all advertising at the point of sale.
- The legislation does not prohibit the placement of tobacco products next to toys or candy at the point of sale.

Tobacco Purchase Incentives



Type of Purchase Incentive

Fig 29. Tobacco purchase incentives in Pakistan.

Map of Price Discounts for Tobacco Products

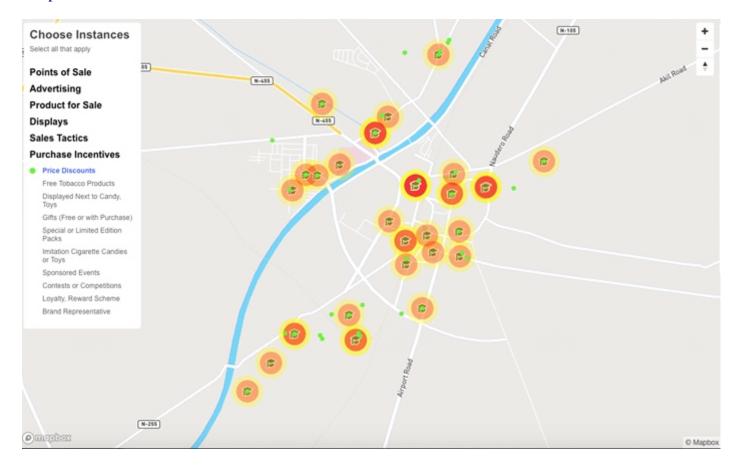


Fig 30. Price discounts offered on tobacco products near schools in Larkana.

Map of Free Tobacco Products

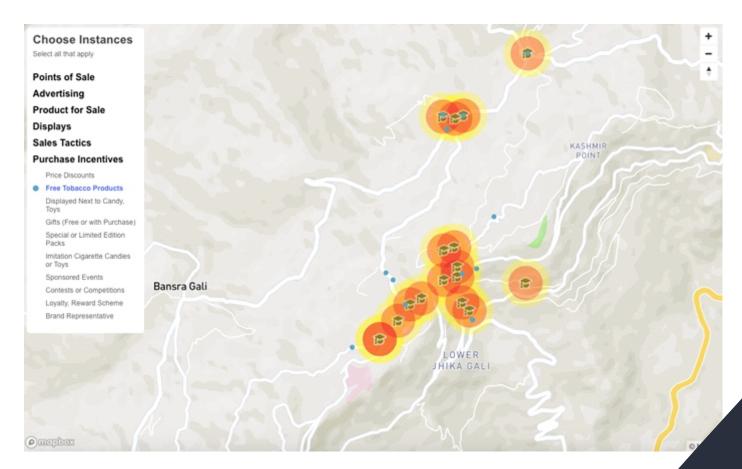


Fig 31. Free tobacco products observed near schools in Murree.

Discussion and Conclusion

Pakistan's children are subjected to a wide array of tobacco industry tactics near their schools that encourage lifelong tobacco addiction. Several laws are in place to help curb the global tobacco epidemic in Pakistan but there are several gaps in the law that put Pakistan's children at risk.

Tobacco industry advertising, promotion and sponsorship thrives on gaps and loopholes in the existing tobacco control law. Following a ban on advertisements in the media, cigarette packs within a POS, have become a key advertising medium for the industry. They lure consumers especially school going children by promoting tobacco products through attractive and eye-catching power walls or contracted boards and fascia inside retail shops, particularly the shops close to schools. Companies provide financial incentives to retail shopkeepers in the form of gift items, décor of the retail shops and cash benefits in return for prime display of their products at points of sale.

In order to close loopholes in the existing tobacco control law and bring it in conformity with the Article 13 of the FCTC, the legislation needs to ban all forms of tobacco advertising, promotion and sponsorship (TAPS), including within a POS.

As an immediate step, the federal government needs to reconstitute and activate CTAG (Committee on Tobacco Advertisement Guidelines) on a permanent basis, tasked with constant reviewing and updating existing TAPS laws to effectively stop the tobacco industry from promoting their products among the children.

To strengthen the current law and otherwise combat tobacco industry targeting of children and youth, this report recommends the following:

- 1. The government of Pakistan must enforce its current tobacco control legislation, including:
 - a. the Prohibition of Smoking and Protection of Non-Smokers Ordinance, 2002 which bans sales of tobacco products within 50 meters of schools; and
 - b. the following SROs issued under the 2002 Ordinance:
 - i. SRO 1086 (I)/2013 which restricts point of sale advertising;
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- 2. The government also must strengthen Pakistan's tobacco control legislation, to include a ban on all forms of point of sale tobacco advertising and point of sale tobacco product display.
- 3. The government should reconstitute and activate the Committee on Tobacco Advertisement Guidelines (CTAG) on a permanent basis and task the CTAG with continuously reviewing and updating Pakistan's tobacco control legislation as it relates to tobacco industry advertising, promotion and sponsorship.
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