As of February 2017, China’s health warning labels (HWLs) – which fulfill the Framework Convention on Tobacco Control (FCTC) Article 11 minimum requirements – included the following:

1. 35 percent coverage of the front and back of the pack
2. Text warning displayed on contrasting background color
3. Three different tobacco use health warning messages, in Chinese

TPackSS systematically collected a sample of 244 unique cigarette packs that displayed the HWLs mandated by China. Packs were assessed for compliance with four key requirements.3

China’s HWL size tied for 19th in the WHO Western Pacific Region and tied for 115th globally in 2017.1 However, FCTC guidelines recommend the use of pictorial warnings that cover 50 percent or more of the front and back of the pack, which China’s HWLs do not fulfill.

TPackSS assesses health warning label compliance as HWL requirements improve in countries. In February 2017, TPackSS collected cigarette packs in Shanghai, Beijing, Chengdu, Kunming and Guangzhou using a systematic protocol.2 Cigarette packs were assessed for compliance with the current HWL policy in place at the time of data collection.3

### Warning Location

100 percent of the packs had a health warning in the lower or right side portion of the front and back of the pack.

### Warning Size

95 percent of packs had a health warning that covered 35 percent of both the front and back of the pack.

### Warning Label Elements

96 percent of packs had a single color warning background with contrasting text.

### Warning Text Size

100 percent of packs had health warning text no less than 4.5mm in height.

91% of the unique cigarette packs assessed were compliant with the four key HWL requirements.
Area of Concern: Package Design

China’s law requires HWLs to be positioned at the bottom of the pack and have text that contrasts with the background. Due to the ability for manufacturers to select the colors of the HWL, labels can be integrated into the packaging design, rather than being displayed prominently. These packs demonstrate how packaging design can influence the prominence of HWLs.

Breakdown of packs collected and presence of required HWLs

Total number of unique packs collected: 738
- **33 percent** of total packs had the current mandated HWL (n=244)
- **49 percent** of total packs had an expired HWL (n=360)
- **18 percent** of total packs had no HWL or a non-Chinese HWL (n=134)

Nearly half of all packs collected displayed an expired Chinese HWL. China’s health warning label policy should require the recall or removal of all packs with previous warnings. Additionally, China continues to lag behind its peers in label size and content, still displaying text-only warnings. Exposure to best practice HWLs can improve the effectiveness of HWLs in China.

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About TPackSS

The Institute for Global Tobacco Control (IGTC) at the Johns Hopkins Bloomberg School of Public Health developed the Tobacco Pack Surveillance System (TPackSS) project to monitor whether required health warnings on tobacco packages are being implemented as intended, and to identify pack features and marketing appeals that might violate or detract from country tobacco packaging laws in these countries.