As of November 2013, China's health warning labels (HWLs) – which fulfill the Framework Convention on Tobacco Control (FCTC) Article 11 minimum requirements – included the following:

1. 30 percent coverage of the front and back of the pack
2. Text warning displayed on contrasting background color
3. Two different tobacco use health warning messages, in Chinese

China’s HWL size tied for 11th in the WHO Western Pacific Region and tied for 97th globally in 2012. 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 November 2013, TPackSS collected cigarette packs in Beijing, Shanghai, Chengdu, Kunming and Guangzhou using a systematic protocol. Cigarette packs were assessed for compliance with the current HWL policy in place at the time of data collection.

TPackSS systematically collected a sample of 352 unique cigarette packs that displayed the HWLs mandated by China. Packs were assessed for compliance with four key requirements.  

<table>
<thead>
<tr>
<th>Warning Location</th>
<th>Warning Size</th>
<th>Warning Label Elements</th>
<th>Warning Text Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>100 percent of packs had a text health warning positioned on the bottom portion of the pack or opposite the opening of the pack.</td>
<td>99 percent of packs had health warnings that covered 30 percent of both the front and back of the pack.</td>
<td>91 percent of packs had the required contrast between the color of the warning text and background.</td>
<td>99.7 percent of packs had health warning text no less than 4 mm in height. One pack did not have health warning text at least 4 mm high.</td>
</tr>
</tbody>
</table>

90% of the unique cigarette packs assessed were compliant with the four key HWL requirements.
Area of Concern: Health Warning Label Design

There are no requirements for health warning label, text color or background color. The packs displayed are noteworthy in that the warnings blend in with the rest of the pack. Allowing design patterns to be included in the HWL space draws attention away from the HWL.

Breakdown of packs collected and presence of required HWLs

Total number of unique packs collected: 453
- **78 percent** of total packs had the current mandated HWL (n=352)
- **15 percent** of total packs had an expired HWL (n=69)
- **7 percent** of total packs had no HWL or a non-Chinese HWL (n=32)

Almost a quarter of all packs collected in China displayed a previous Chinese HWL, no HWL, or a non-Chinese HWL.

At a minimum, China’s health warning label policy should require the HWL background to be plain and standardized and not part of the pack design, and require a pictorial HWL and coverage of at least 50 percent on the front and back of the pack. Exposure to best practice HWLs can improve the effectiveness of HWLs in China.

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