

Consultation Response: Implementing inserts in cigarette and hand rolling tobacco packs

Response on behalf of ASH Wales Cymru, submitted 20/01/2026

ASH Wales Cymru is the only organisation solely dedicated tobacco control in Wales. Established in 1976, we work to raise awareness of the health, social and economic effects of smoking by working closely with communities, young people and partner organisations across Wales to create change for the better.

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Placement of pack inserts in packaging

We have included a short summary and the images for all the proposals in the survey. The full proposals, including images, are in the relevant sections above.

Cigarette packaging

For flip-top cigarette packaging, we propose that loose inserts are placed between the cigarette bundle and the inner frame of the packet. The inserts should be easily removable and not attached to the rest of the packaging in any way.

Do you agree or disagree with the proposed placement of inserts for flip-top cigarette packaging? (Optional)

- Agree
- Disagree
- Don't know

For soft pack cigarette packaging, we propose that quit messaging is folded lengthwise twice and added in the side of the package.

Do you agree or disagree with the proposed placement of inserts for soft pack cigarette packaging? (Optional)

- Agree
- Disagree
- Don't know

For shoulder hinged cigarette packaging, we propose that the inserts are placed inside the pack, on top of the bundled cigarettes.

Do you agree or disagree with the proposed placement of inserts for shoulder hinged cigarette packaging? (Optional)

- Agree
- Disagree
- Don't know

If you have any comments on the proposed placement of inserts for cigarette packaging, please include them here. (Optional, maximum 500 words)

ASH Wales broadly supports the proposed placement of pack inserts across flip-top, soft pack, and shoulder-hinged cigarette packaging, recognising the potential for inserts to complement existing health warnings when they are clearly visible and encountered during normal pack use.

Evidence from Canada, where cigarette pack inserts with cessation messaging have been implemented nationally since 2000, demonstrates that inserts can be an effective complement to pictorial health warnings.¹ Longitudinal and experimental studies show that smokers who notice and read pack inserts report increased knowledge of how to quit, greater confidence in their ability to quit, and a higher likelihood of making quit attempts compared with smokers exposed to health warnings alone.² Importantly, these effects have been observed across socioeconomic groups, suggesting that inserts may help support reductions in smoking-related inequalities.

ASH Wales also notes evidence from a short-term randomised trial examining the combined use of cigarette pack inserts and health warning labels. This study found that the inclusion of inserts alongside existing warnings was associated with increased indicators linked to smoking cessation, suggesting that inserts can play a supportive role when used as part of a wider tobacco control approach.³

The effectiveness of pack inserts depends on clear visibility and consistent exposure across pack formats. This is particularly important for soft pack cigarette packaging, where folding and side placement may reduce engagement. Careful consideration should therefore be given to whether proposed placements deliver equivalent exposure in practice.

Visibility and repeated exposure are also important for reaching people who smoke socially or occasionally, who may not identify as “smokers” and may underestimate the health risks associated with even low levels of smoking. Ensuring that quit messaging is encountered consistently during pack use can help make the harms of smoking and the availability of support more salient to this group.

The proposed placements broadly align with evidence from tobacco packaging policy, including standardised packaging, which shows that measures are most effective when implemented as part of a coherent package and when health warnings and cessation messaging serve distinct but complementary functions.⁴ To achieve this, placement requirements should prioritise visibility and consistency, and minimise opportunities for pack design to undermine the intended impact of inserts.

¹ Moodie, C. (2018) *Adult smokers’ perceptions of cigarette pack inserts promoting cessation: a focus group study*. *Tobacco Control*. Available at: <https://tobaccocontrol.bmj.com/content/27/1/72?>

² Thrasher, J. et al. (2016) Cigarette package inserts can promote efficacy beliefs and sustained smoking cessation attempts: A longitudinal assessment of an innovative policy in Canada. Available at: <https://davidhammond.ca/wp-content/uploads/2014/12/2016-HWM-Inserts-Efficacy-Prev-Med-Thrasher-et-al.pdf>

³ Thrasher J. et al. Combining Inserts With Warning Labels on Cigarette Packs to Promote Smoking Cessation: A 2-Week Randomized Trial, *Annals of Behavioral Medicine*, Volume 58, Issue 1, January 2024, Pages 56–66, <https://doi.org/10.1093/abm/kaad052>

⁴ Action on Smoking and Health (2017) Standardised tobacco packaging. Available at: [plain_packaging-26-April-2017-1.pdf](https://www.ash.org.uk/publications/standardised-tobacco-packaging-26-april-2017-1.pdf)

Hand rolling tobacco packaging

For wrap-around hand rolling tobacco packaging, we propose that instead of a pack insert, the same quit messaging is printed on the inner surface of the flap. The messaging must be positioned below the text health warning as the text health warning is positioned at the top edge of the pack when the pack is fully opened. The quit messaging must be visible, and not covered by packaging seals.

Do you agree or disagree with the proposed placement of messaging for wrap-around hand rolling tobacco packaging? (Optional)

- Agree
- Disagree
- Don't know

If you have any comments on the proposed placement of messaging for wrap-around hand rolling tobacco packaging, please include them here. (Optional, maximum 500 words)

There is a strong socioeconomic gradient in hand rolling tobacco use, with higher prevalence among people experiencing socioeconomic disadvantage. These groups already face greater barriers to accessing cessation support and higher levels of smoking-related harm. It is therefore essential that quit messaging for these products is as visible and effective as possible.

In the UK, hand rolling tobacco is often used alongside cannabis, meaning some people are exposed to nicotine and tobacco smoke without identifying as smokers. Pack inserts therefore have the potential to reach tobacco users in a wider range of contexts, including those who may be unaware of their nicotine exposure. Consideration should be given to ensuring that cessation messaging is relevant and accessible to people who use tobacco intermittently or in combination with other substances, while remaining focused on tobacco harm and avoiding the normalisation of illicit drug use.

We broadly support the proposed placement of quit messaging on the inner surface of wrap-around hand rolling tobacco packaging, provided this approach is adopted on the basis of effectiveness rather than packaging convenience.

However, the effectiveness of printing cessation messaging directly onto the inner surface of the flap will depend on whether this approach delivers clear, repeated exposure during normal pack use. Wrap-around pouches are handled and accessed differently from cigarette packs, often over a longer period of time, and there is a risk that printed messaging may be obscured by folds, internal seams, or the tobacco itself. Placement requirements should therefore prioritise visibility on opening and ensure that messaging is not easily overlooked or concealed.

While printing messaging directly onto packaging may reduce the likelihood of inserts being immediately discarded, it also removes the opportunity for smokers to retain quit information as a separate item, which may limit the duration of exposure compared with loose inserts. Given the evidence that repeated and sustained exposure to cessation messaging is important for supporting quit attempts, this potential limitation should be carefully considered when finalising requirements.

Evidence underpinning UK tobacco packaging policy, including the Chantler Review, highlights that packaging measures are most effective when health warnings and cessation messaging serve distinct but complementary functions.⁵ To achieve this for hand rolling tobacco, decisions on placement should be guided primarily by effectiveness and consistency across pack formats, rather than by packaging convenience. Consideration should therefore be given to whether alternative approaches, including loose inserts or internal attachments, could deliver greater and more consistent impact for users of wrap-around packaging.

For hand rolling tobacco packaged in cylinders and standing pouches, we propose that the inserts are placed inside the packs with the tobacco.

Do you agree or disagree with the proposed placement of inserts for cylinder and standing pouch packaging of hand rolling tobacco? (Optional)

- Agree
- Disagree
- Don't know

If you have any comments on the proposed placement of inserts for cylinder and standing pouch packaging of hand rolling tobacco, please include them here. (Optional, maximum 500 words)

We support the proposed inclusion of pack inserts in cylinder and standing pouch hand rolling tobacco packaging, subject to placement ensuring that inserts are clearly visible on opening and during normal use.

Placing inserts inside the pack has the potential to deliver cessation messaging at the point of use and allow for repeated exposure over time. However, as with wrap-around packaging, the effectiveness of this approach will depend on whether inserts are positioned so that they are not concealed by the tobacco, internal folds, or pack design features.

Given the wide variation in size and structure of cylinder and standing pouch packaging, placement requirements should be sufficiently robust to ensure that inserts are as

⁵ Chantler, C. (2014) *Standardized packaging of tobacco*. Available at: [Chantler-Review](#)

prominent and unavoidable as those included in cigarette packaging. Consistency across hand rolling tobacco formats is important to avoid weaker or less effective exposure to quit messaging among groups with higher smoking prevalence and greater levels of addiction.

Shape and size of pack inserts

Cigarette packaging

For flip-top and shoulder hinged cigarette packaging, we propose that the inserts are sized based on the pack's outer dimensions, but reduced by 8mm in both width and height.

Do you agree or disagree with the proposed sizing of inserts for flip-top and shoulder hinged cigarette packaging? (Optional)

- Agree
- Disagree
- Don't know

For soft pack cigarette packaging, we propose that the inserts must measure 48mm wide by 95mm high, and when folded, 16mm wide and 95mm high.

Do you agree or disagree with the proposed sizing of inserts for soft pack cigarette packaging? (Optional)

- Agree
- Disagree
- Don't know

If you have any comments on the proposed sizing of inserts for cigarette packaging, please include them here. (Optional, maximum 500 words)

ASH Wales broadly supports the proposed sizing of pack inserts for cigarette packaging, recognising the importance of ensuring that inserts are sufficiently large to be clearly visible, legible, and usable during normal pack use.

Sizing inserts in proportion to pack dimensions for flip-top and shoulder-hinged packs, with a modest reduction in width and height, appears broadly appropriate, provided this does not compromise visibility or ease of handling. Ensuring inserts are durable enough to withstand repeated handling is also important to support ongoing engagement with cessation information.

For soft pack cigarette packaging, the proposed dimensions and folding requirements may present greater challenges in terms of visibility, durability, and retention. Lighter,

folded inserts may be more easily overlooked, damaged, or discarded, potentially reducing their effectiveness compared with inserts used in other pack formats. Given the importance of maximising the public health impact of pack inserts, careful consideration should be given to whether the proposed sizing for soft packs delivers equivalent exposure and usability in practice.

Evidence from Canada indicates that engagement with pack inserts is associated with their being noticed and read repeatedly over time, highlighting the importance of visibility and readability in insert design. To align with this evidence, sizing requirements across all cigarette packaging formats should prioritise effectiveness for consumers and minimise opportunities for pack design features to weaken the intended impact of cessation messaging.

Hand rolling tobacco packaging

For wrap-around hand rolling tobacco packaging, we propose the printed quit messaging must measure 115mm wide by 63mm high.

Do you agree or disagree with the proposed sizing of messaging for wrap-around hand rolling tobacco packaging? (Optional)

- **Agree**
- Disagree
- Don't know

If you have any comments on the proposed sizing of messaging for wrap-around hand rolling tobacco packaging, please include them here. (Optional, maximum 500 words)

ASH Wales broadly supports the proposed sizing of printed quit messaging for wrap-around hand rolling tobacco packaging, subject to the dimensions being sufficient to ensure that messaging is clearly visible and legible each time the pack is opened.

While the proposed measurements may be technically suitable for this packaging format, their effectiveness will depend on whether the messaging remains prominent during repeated use and is not obscured by folds, internal seams, or the tobacco itself. Given that hand rolling tobacco packaging is often opened and accessed repeatedly over a longer period than cigarette packs, sizing should be adequate to ensure consistent exposure throughout normal use.

It is also important that printed cessation messaging on wrap-around packaging is not treated as a weaker alternative to loose inserts used elsewhere. Sizing requirements should therefore be considered in the context of overall impact and consistency across hand rolling tobacco formats, to ensure that people who use these products are not exposed to less effective quit information.

For hand rolling tobacco packaged in cylinders and standing pouches, we propose that the inserts must measure 55mm wide by 80mm high.

Do you agree or disagree with the proposed sizing of inserts for cylinder and standing pouch packaging of hand rolling tobacco? (Optional)

- Agree
- Disagree
- Don't know

If you have any comments on the proposed sizing of inserts for cylinder and standing pouch packaging of hand rolling tobacco, please include them here. (Optional, maximum 500 words)

ASH Wales supports the proposed sizing of inserts for cylinder and standing pouch packaging of hand rolling tobacco, provided that the dimensions ensure clear visibility and legibility on opening and during normal pack use.

As with cigarette packaging, the priority should be that inserts are sufficiently large and robust to support repeated handling and engagement, and that their placement and size are not undermined by pack design features or variability in pack structure. Sizing requirements should aim to ensure that inserts in hand rolling tobacco products are as prominent and unavoidable as those used in cigarette packaging, to support equitable exposure to cessation messaging.

Shape of loose inserts and printed messaging

We propose that loose inserts and printed messaging are rectangular in shape. They must not be bevel shaped or embellished in any way.

Do you agree or disagree with the proposed shape of the inserts? (Optional)

- Agree
- Disagree
- Don't know

If you have any comments on the proposed shape of inserts, please include them here. (Optional, maximum 500 words)

ASH Wales supports the proposed requirement that loose inserts and printed messaging are rectangular in shape and not embellished.

A simple, standardised shape is consistent with the principles underpinning existing tobacco packaging regulation, which are intended to prevent the use of design features that could increase appeal, distract from health messaging, or be used for promotional

purposes. Requiring inserts to be plain and unembellished helps ensure that they serve a clear public health function and are not used to undermine wider tobacco control objectives.

Standardised, non-customisable shapes and formats across all products and manufacturers are essential to minimise the risk of industry interference, prevent design-led dilution of impact, and ensure that inserts cannot be adapted in ways that increase product appeal or reduce the visibility and effectiveness of cessation messaging.

Material to use for pack inserts

Cigarette packaging

For all cigarette packaging, we propose that loose inserts must be recyclable and coated with a clear, protective matt finish. The clear coating must not prevent the insert from being recycled.

Do you agree or disagree with the proposed material of inserts for cigarette packaging? (Optional)

- Agree
- Disagree
- Don't know

For flip-top and shoulder hinged cigarette packaging, we propose that the inserts must be printed on 180gsm paper.

Do you agree or disagree with the proposed paperweight of inserts for flip-top and shoulder hinged cigarette packaging? (Optional)

- Agree
- Disagree
- Don't know

For soft pack cigarette packaging, we propose that the inserts must be printed on 80gsm paper, to allow for the folding required.

Do you agree or disagree with the proposed paperweight of inserts for soft pack cigarette packaging? (Optional)

- Agree
- Disagree
- Don't know

If you have any comments on the proposed material and paperweight of inserts for cigarette packaging, please include them here. (Optional, maximum 500 words)

ASH Wales broadly supports the proposed requirements that pack inserts for cigarette packaging are recyclable and finished with a clear, protective matt coating, provided that any coating does not compromise recyclability. This approach is consistent with wider policy objectives to minimise environmental impact while ensuring that inserts remain usable during normal pack handling.

The durability of pack inserts is an important consideration from a public health perspective. Inserts that are sufficiently robust are more likely to be retained and revisited by people who smoke, increasing the likelihood of repeated exposure to cessation messaging. Proposed paperweights for flip-top and shoulder-hinged cigarette packaging appear broadly appropriate in this regard.

However, the proposed paperweight for inserts used in soft pack cigarette packaging raises concerns about durability and retention. Lighter paper inserts may be more easily damaged, folded, or discarded, potentially reducing their effectiveness compared with inserts used in other pack formats. Given the importance of maximising the impact of pack inserts and ensuring consistency across cigarette packaging types, careful consideration should be given to whether the proposed material specifications for soft packs deliver equivalent public health benefit in practice.

Overall, material and paperweight requirements should prioritise durability, visibility, and effectiveness for consumers, and minimise opportunities for pack format differences to weaken the intended impact of cessation messaging.

Hand rolling tobacco packaging

For wrap-around hand rolling tobacco packaging, we propose that quit messaging must be printed directly onto the packaging and the pouch must be coated with the same protective finish that is currently used.

Do you agree or disagree with the proposed material of messaging for wrap-around hand rolling tobacco packaging? (Optional)

- Agree
- Disagree
- Don't know

If you have any comments on the proposed material of messaging for wrap-around hand rolling tobacco packaging, please include them here. (Optional, maximum 500 words)

While printing messaging directly onto packaging may be practical from a manufacturing perspective, it removes the opportunity for people who smoke to retain

quit information as a separate item. This may limit the duration of exposure compared with loose inserts, particularly for users who engage with packaging over extended periods. Given the importance of repeated exposure to cessation messaging in supporting quit attempts, this potential limitation should be carefully considered when finalising material requirements.

As with placement and sizing, decisions on materials for wrap-around packaging should be guided primarily by effectiveness and consistency, rather than convenience, to ensure that people who use hand rolling tobacco are not subject to weaker or less durable forms of quit messaging than those used in other packaging formats.

For hand rolling tobacco packaged in cylinders and standing pouches, we propose that loose inserts must be recyclable and coated with a clear, protective matt finish. The clear coating must not prevent the insert from being recycled. We propose that the inserts must be printed on 200gsm paper.

Do you agree or disagree with the proposed material and paperweight of inserts for cylinder and standing pouch packaging of hand rolling tobacco? (Optional)

- Agree
- Disagree
- Don't know

If you have any comments on the proposed material and paperweight of inserts for cylinder and standing pouch packaging of hand rolling tobacco, please include them here. (Optional, maximum 500 words)

ASH Wales supports the proposed material and paperweight requirements for inserts used in cylinder and standing pouch packaging of hand rolling tobacco, provided that these specifications ensure durability, legibility, and repeated usability.

Requiring inserts to be recyclable and finished with a clear, protective matt coating is appropriate, provided recyclability is not compromised. The proposed paperweight appears broadly suitable to support durability during handling and use. As with cigarette packaging, material requirements should prioritise the ability of inserts to withstand repeated handling and to be retained by users, supporting ongoing engagement with cessation messaging.

Messaging and imagery on pack inserts

Loose pack inserts

The proposed messaging and imagery of loose pack inserts applies to:

- all cigarette packaging

- cylinder hand rolling tobacco packaging
- standing pouch hand rolling tobacco packaging

We propose that the loose inserts are printed on both sides, with quit messaging on one side. On the other side, we propose that the loose inserts have a QR code and web address to a smoking cessation website, as well as the 4 nation healthcare logos. For soft pack cigarette packaging, part of the back of the insert would also have the text health warning on it.

Do you agree or disagree with the proposed messaging and imagery that would be included on loose inserts? (Optional)

- Agree
- Disagree
- Don't know

We propose that the loose inserts are printed in portrait orientation.

Do you agree or disagree with the proposed printing orientation of loose inserts? (Optional)

- Agree
- Disagree
- Don't know

If you have any comments on the proposed messaging or printing orientation of loose inserts, please include them here. (Optional, maximum 500 words)

ASH Wales broadly supports the proposed messaging and imagery for loose pack inserts, including quit messaging and signposting to cessation support, provided content and format maximise accessibility and public health impact.

Evidence from Canada, where cigarette pack inserts with cessation messaging have been implemented nationally, shows that inserts providing positive, instructional quit information can increase knowledge of how to quit, confidence in quitting, and quit attempts when used alongside existing health warnings.^{1 2} Qualitative and survey evidence from the UK similarly indicates that inserts are viewed as attention-grabbing, credible, and educational, and that a substantial proportion of people who smoke would read and engage with insert content.⁶

⁶ Moodie, C. et al. (2018). Perceptions of cigarette pack inserts promoting cessation and dissuasive cigarettes among young adult smokers in the UK: a cross-sectional online survey. Available at: [e019662.full.pdf](https://www.ash-wales.org.uk/e019662.full.pdf)

However, the effectiveness of insert messaging will depend heavily on the precision and tone of the wording used. Messaging should avoid tentative or ambiguous language and clearly reflect the strength of the evidence base, for example by stating that quitting smoking improves health outcomes. Care should be taken in relation to mental health messaging. Inserts should actively address and correct the widespread misconception that smoking relieves stress or improves mental health, while avoiding language that could be interpreted as dismissive, overly directive, or trivialising of mental health experiences. The evidence shows that quitting smoking is associated with improvements in mental health outcomes, and this should be communicated clearly and credibly.

ASH Wales welcomes the inclusion of national healthcare branding, which can enhance trust and credibility, and supports the use of QR codes and web addresses to facilitate access to up-to-date cessation support. However, reliance on digital signposting alone risks excluding some people who smoke, particularly those in priority groups who may have limited access to smartphones, data, or the internet. It is therefore important that inserts also clearly signpost non-digital routes to support, such as speaking with a GP, pharmacist, or other health professional.

QR codes and web links should direct users to a four-nation landing page, or automatically route people to the appropriate cessation support in their nation, to ensure equitable access to services across England, Wales, Scotland, and Northern Ireland and avoid defaulting to England-only provision.

Printing inserts on both sides is appropriate and allows effective use of available space without increasing visual clutter. The inclusion of the text health warning on the reverse of soft pack inserts is also appropriate and helps maintain consistency with existing regulatory requirements. ASH Wales broadly supports the proposed portrait orientation, subject to this remaining the most effective format for readability and engagement across different packaging types.

Finally, consideration should be given to the need for periodic review and renewal of insert messaging over time. Without refreshment, there is a risk of desensitisation, reducing effectiveness.

Wrap-around hand rolling tobacco packaging

We propose that the printed messaging on wrap-around hand rolling tobacco packaging includes:

- quit messaging
- a QR code and web address to a smoking cessation website
- the 4 nation healthcare logos

This is the same messaging as shown on the loose inserts.

Do you agree or disagree with the proposed printed messaging for wrap-around hand rolling tobacco packaging? (Optional)

- Agree
- Disagree
- Don't know

We propose that the messaging printed on wrap-around hand rolling tobacco packaging must be printed in landscape orientation.

Do you agree or disagree with the proposed printing orientation of printed messaging for wrap-around hand rolling tobacco packaging? (Optional)

- Agree
- Disagree
- Don't know

If you have any comments on the proposed messaging or printing orientation of messaging for wrap-around hand rolling tobacco packaging, please include them here. (Optional, maximum 500 words)

ASH Wales broadly supports the proposed printed messaging for wrap-around hand rolling tobacco packaging, including the inclusion of quit messaging, a QR code and web address to smoking cessation support, and the four nation healthcare logos, provided that this approach delivers messaging that is as clear, visible, and effective as that used in loose pack inserts.

QR codes and web links should direct users to a four-nation landing page, or automatically route people to the appropriate cessation support in their nation, to ensure equitable access to services across England, Wales, Scotland, and Northern Ireland and avoid defaulting to England-only provision.

Providing consistent cessation information across tobacco products and packaging formats is essential to ensure equitable access to evidence-based support. This is particularly important for people who use hand rolling tobacco, given the strong socioeconomic gradient in smoking prevalence and the greater affordability of hand rolling tobacco compared with manufactured cigarettes. Messaging on wrap-around packaging should therefore not represent a weaker or less effective standard than that applied to cigarette packaging.⁷

⁷ ASH Wales (2025) Annual Adult Population Survey. Available at: [ASH Wales Annual Adult Population Survey 2025](#)

ASH Wales broadly supports the proposed messaging themes, while recommending careful refinement of wording to maximise clarity and public health impact. Messaging should actively address and dispel persistent myths that can deter quit attempts, including the widespread belief that stopping smoking worsens mental health. The evidence shows that quitting smoking is associated with improvements in mental health outcomes, and this should be communicated clearly and credibly.

Particular care should also be taken with language relating to relapse, cravings, and age. Messaging should avoid reinforcing fatalistic attitudes or suggesting that continued smoking is inevitable or less harmful later in life. Instead, wording should emphasise that support is effective at all ages, that cravings are temporary and manageable, and that repeated quit attempts are common and can lead to success.

ASH Wales supports the inclusion of national healthcare branding and digital signposting, which can enhance trust and facilitate access to up-to-date support. However, reliance on digital routes alone risks excluding some people who smoke, particularly those experiencing socioeconomic disadvantage. Clear signposting to non-digital sources of support, such as healthcare professionals, should therefore be included alongside QR codes and web addresses.

We also note ongoing public misperceptions about the relative harms of vaping compared with smoking. As messaging is reviewed and updated over time, consideration could be given to the inclusion of a dedicated vaping-focused insert or messaging element that clearly reflects the evidence that vaping is substantially less harmful than smoking and can support quitting, while maintaining a strong focus on preventing uptake among children.

ASH Wales broadly supports the proposed landscape orientation for printed messaging on wrap-around packaging, subject to this format proving most effective for readability and engagement when the pack is opened.

If you have any comments on the consideration of inks for loose inserts and printed messaging, please include them here. (Optional, maximum 500 words)

ASH Wales has no objection in principle to the use of inks for loose inserts and printed messaging, provided that ink specifications support the effectiveness, durability, and accessibility of cessation messaging and do not undermine wider tobacco control objectives.

Inks should be selected to ensure high contrast, legibility, and clarity throughout the lifespan of the insert or packaging, including during repeated handling. Messaging must remain readable and not fade, smudge, or degrade over time, particularly for hand rolling tobacco packaging that may be used over extended periods.

Equal use of messaging

We propose that across all cigarette and hand rolling tobacco packaging, the different insert messages should appear in, or on, equal numbers of retail packages. This applies to different brand families, brands and packaging sizes and types.

Do you agree or disagree with the proposed equal use of messaging? (Optional)

- Agree
- Disagree
- Don't know

If you have any comments on the proposed equal use of the messaging, please include them here. (Optional, maximum 500 words)

ASH Wales supports the proposed requirement for equal use of different insert messages across all cigarette and hand rolling tobacco packaging.

Ensuring that messages are distributed evenly across brand families, brands, pack sizes, and packaging types is essential to prevent selective placement, avoid gaps in exposure, and reduce the risk of manufacturers exploiting variation to dilute the impact of cessation messaging. Equal rotation of messages helps ensure that people who smoke are exposed to a balanced range of quit information, regardless of the product they use.

Consistent application of messaging is particularly important given the persistent socioeconomic gradient in smoking prevalence in Wales. People experiencing socioeconomic disadvantage are more likely to smoke and more likely to use hand rolling tobacco, and inconsistent application of insert messaging risks reinforcing existing inequalities in access to effective quit information. ⁷

Clear, uniform requirements across all products and pack types also support effective implementation and enforcement. Consistent requirements also align with findings from the 2024 ASH Wales retailer survey, which show that retailers value clear, uniform tobacco regulation and support measures that are straightforward to understand and implement. ⁸

Access to pack inserts messaging

We propose that manufacturers will access the pack insert messaging through an online platform called DH eXchange. Manufacturers currently access the combined health warnings through this platform.

Do you agree or disagree with the proposed method of providing manufacturers with access to the messaging? (Optional)

- Agree
- Disagree
- Don't know

If you have any comments on the proposed method of providing manufacturers with access to the messaging, please include them here. (Optional, maximum 500 words)

Using an established system that manufacturers already access for combined health warnings seems to be a pragmatic approach that can support consistency and accuracy in implementation across products and pack types. Centralised access to standardised messaging also reduces the risk of variation or error and helps ensure that pack inserts are applied uniformly.

Ensuring compliance and leaving no room for industry manipulation should remain the priority when considering the method of providing manufacturers with access to messaging.

Evidence from the 2024 ASH Wales retailer survey indicates that retailers generally support clear and consistent tobacco regulation and value approaches that are straightforward to implement, reinforcing the case for standardised, centrally provided pack insert messaging and clear implementation timelines.⁸

Implementation timelines

We propose that manufacturers have a maximum of 12 months after the regulations are made to implement the requirements in legislation.

Do you agree or disagree with the proposed implementation timelines? (Optional)

- Agree
- Disagree
- Don't know

If you have any comments on the proposed implementation timelines, please include them here. (Optional, maximum 500 words)

ASH Wales supports the proposed implementation timeline of up to 12 months following the making of regulations and emphasises the importance of avoiding any extension beyond this period.

A 12-month timeframe provides manufacturers with sufficient opportunity to adapt packaging and production processes while ensuring that the public health benefits of pack inserts are realised without unnecessary delay. Evidence from other jurisdictions

⁸ ASH Wales (2024) Retailer Survey. Available at: [ash-wales-retailer-survey-2024-1.pdf](#)

demonstrates that this timeframe is achievable. In Australia, manufacturers implemented health promotion inserts within a 12-month transition period, and Canada has successfully integrated pack inserts into tobacco packaging for over two decades. The UK's implementation of standardised packaging was also delivered within a similar timeframe.

Delaying implementation beyond 12 months would postpone the public health benefits of pack inserts and represent a missed opportunity to support quit attempts among people who smoke. Clear guidance, monitoring, and enforcement arrangements should accompany implementation to support consistent compliance across manufacturers and packaging types from the outset.

References

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1 Action on Smoking and Health (2017) Standardised tobacco packaging. Available at: [plain_packaging-26-April-2017-1.pdf](#)

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