Open consultation: Implementing inserts in cigarette and hand rolling tobacco packaging

Deadline: 20 January 2026

About Action on Smoking and Health Scotland

ASH Scotland (Action on Smoking ASH Scotland (Action on Smoking and Health Scotland) is a registered Scottish charity. We work in and for Scotland at national, UK and international levels, taking action to reduce the harms caused by tobacco and related products to achieve a tobacco-free generation by 2034.

We do not engage with nor take funding from the tobacco and related products industries or vested interests; and implement Article 5.3 of the World Health Organisation's Framework Convention on Tobacco Control (FCTC).

Placement of pack inserts in packaging

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

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

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

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

ASH Scotland welcomes the proposed placement of inserts into cigarette packaging. Tobacco companies use packaging for marketing and exploit loopholes [1]. White et al (2015) found young people's declining awareness of tobacco brands contributed to fewer new smokers [2]. UK regulations allow variations in cigarette packaging, e.g. slim designs and shoulder boxes, which smokers perceive as discrete and less harmful. [3]

ASH Scotland calls for a ban on non-standard packs for the following reasons:

The law standardises the colour (Pantone 448C, "drab dark brown"), mandates large health warnings, and standardises font and size for the brand name. It does not, however, fully standardise the shape and structure of the pack. Tobacco companies have shifted their marketing from graphics and logos to the pack architecture itself, which maintains brand differentiation and appeal.

Shoulder hinged or soft shell packs are perceived as a "more premium" product. The hinged mechanism of a shoulder pack mimics cosmetics or high-end confectionery, adding a tactile, "luxury" element. Non-standard packs stand out compared to a standard rectangular box, creating a point of differentiation that can be discussed and favoured. Slim pack designs are primarily targeted at the female market, as decades of tobacco marketing has associated slim cigarettes with femininity, elegance and weight control. [4] A slim pack continues to signal these attributes, bypassing the ban on explicit imagery.

ASH Scotland calls for standardised packaging to mean a single, uniform pack shape and size, and a ban on all innovative materials, openings and structures. Packs should be purely functional, carrying only the legally mandated health warnings and brand name in the prescribed font, without any capacity for design elements to convey appeal, image, or reduced harm perceptions.

Hand rolling tobacco packaging

For wrap-around hand rolling tobacco packaging, ASH Scotland supports the proposal that, instead of a pack insert, the same quit smoking 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 smoking 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

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)

ASH Scotland supports the proposal to include health information inserts in hand rolling tobacco packs.

Since standardised packaging regulations were introduced, tobacco companies have focused on pack structure and materials, as branding through imagery is no longer permitted. For hand rolling tobacco, this shift is even more pronounced than for cigarettes. Manufacturers have moved from basic paper pouches to sophisticated designs featuring soft, resealable materials with zip seals. These mimic premium food packaging to imply freshness and quality. Variations in shape, such as slim or wallet-style pouches, enhance portability and discreetness.

ASH Scotland advocates for complete standardisation as a public health imperative. This measure would require a mandatory, uniform pouch size, shape, and material, such as a standard paper-based pouch with

a simple closure. All tactile finishes, unusual dimensions and premium materials must be eliminated, and the pouch itself must be in the standard drab brown colour. Closing these design loopholes is essential to prevent the packaging of hand rolling tobacco to market the product and mislead consumers about harm.

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

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)

None

Shape and size of pack inserts

Cigarette packaging

For flip-top and shoulder hinged cigarette packaging, ASH Scotland supports the proposal 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

For soft pack cigarette packaging, ASH Scotland supports the proposal 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

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

None

Hand rolling tobacco packaging

For wrap-around hand rolling tobacco packaging, ASH Scotland supports the proposal the printed quit smoking 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

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)

For hand rolling tobacco packaged in cylinders and standing pouches, ASH Scotland supports the proposal 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

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)

None

Shape of loose inserts and printed messaging

ASH Scotland supports the proposal that loose inserts and printed messaging are rectangular in shape. They must not be bevelled, shaped or embellished in any way.

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

Agree

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

None

Material to use for pack inserts

Cigarette packaging

For all cigarette packaging, ASH Scotland supports the proposal 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

For flip-top and shoulder hinged cigarette packaging, ASH Scotland supports the proposal 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

For soft pack cigarette packaging, ASH Scotland supports the proposal 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

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

None

Hand rolling tobacco packaging

For wrap-around hand rolling tobacco packaging, ASH Scotland supports the proposal that quit smoking 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

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)

For hand rolling tobacco packaged in cylinders and standing pouches, ASH Scotland supports the proposal 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

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)

None

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

ASH Scotland supports the proposal that the loose inserts are printed on both sides, with quit smoking 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 four 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)

Disagree

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

Agree

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

ASH Scotland possesses a firm evidence-based opposition to including positive messaging about vaping or any other non-medicinally licensed products as a claimed quit smoking method on tobacco or cigarette pack inserts and as this runs contrary to Scotland's established precautionary stance.

WHO's clinical treatment guideline for tobacco cessation in adults (issued July 2024) [5] provides recommendations on the use of behavioural support delivered in both clinical and community settings including digital tobacco cessation, pharmacological and system-level interventions. The guideline does not include e-cigarettes as current evidence remains not strong enough to recommend these as a population level cessation strategy.

Over 30,000 variants of e-cigarettes are registered by the Medicines and Healthcare products Regulatory Agency (MHRA) and none is medicinally licensed either by MHRA or anywhere globally.

In aligning with Scotland's consensus approach on smoking cessation, NHS Scotland's *Quit your Way* services welcome people wishing to quit smoking, but only positively recommend medically licensed quit aids, which have the strongest evidence base for efficacy and are tested and monitored, quality-controlled and medicinally supervised and regulated. The vast majority (60%) of successful quit smoking attempts in Scotland have been unaided.

A major systematic review indicates that people who are non-smokers using e-cigarettes are approximately three times more likely to initiate cigarette smoking [6]. The health harms of vaping itself are increasingly concerning. A 2023 global evidence review found conclusive links to acute lung injury, poisoning, and seizures. [6]

E-cigarettes include toxic chemicals not safety tested for inhalation; WHO notes that "we do know that they generate toxic substances, some of which are known to cause cancer and some that increase the risk of heart and lung disorders". [7]

Cigarette pack inserts represent a public health communication opportunity to guide every person who smokes in Scotland towards the evidence-based and expert free person-centred support of NHS Scotland.

ASH Scotland advocates for the use of full-colour imagery in inserts. The goal of tobacco control is not just to inform, but to persuade and motivate change in the face of addiction. Human cognition is inherently drawn to colour. Full-colour imagery and design increase attention, engagement, and memory encoding. Full-colour visuals transcend language and literacy barriers, delivering a powerful, universal message.

Wrap-around hand rolling tobacco packaging

ASH Scotland proposes that the printed messaging on wrap-around hand rolling tobacco packaging includes:

- quit smoking messaging (without reference to non-medicinally licensed products)
- a QR code and web address to a smoking cessation website consistent with the cessation approaches in all four nations
- the four 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)

Disagree

ASH Scotland supports the proposal that the quit smoking 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

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)

Please refer to ASH Scotland's response advocating that quit smoking messaging should not include vaping or any other non medicinally licensed product as a proposed quit method on inserts.

Equal use of messaging

ASH Scotland supports the proposal that across all cigarette and hand rolling tobacco packaging, the different insert quit smoking 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

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

None

Access to pack inserts messaging

We propose that manufacturers will access the pack insert messaging though 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

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)

None

Implementation timelines

ASH Scotland supports the proposal that manufacturers should have a maximum of 12 months after the regulations are made to implement the requirements.

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

Agree

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

ASH Scotland strongly supports the principle of including public health messaging in tobacco product inserts as a critical measure to reach people who smoke at the point of use. We advocate, however, that the proposed 12-month implementation timeline must be intrinsically linked to, and contingent upon, the design and launch of a comprehensive, independent evaluation framework. A rapid rollout without parallel evaluation would represent a significant missed opportunity to strengthen public health policy

The inserts will carry important messages. It is therefore imperative that metrics are developed to systematically assess their effectiveness, and how that effectiveness could be optimised.

A 12-month implementation phase should be used not merely for logistical compliance by manufacturers, but as the first phase of a rigorous public health study involving baseline data collection, control groups (e.g. comparing regions or using varied message sets), and long-term follow-up metrics established in partnership with academic, research and third sector public health bodies.

ASH Scotland urges the UK Government to mandate that the implementation timeline includes the development of an evaluation protocol with public health stakeholders.

Any other comments

If there are any cigarette or hand rolling tobacco packaging types we haven't included in this consultation, please include them here. (Optional, maximum 500 words)

None

If you have any further comments on the proposals in this consultation, please include them here. (Optional, maximum 500 words)

As well as inserts, ASH Scotland advocates for the implementation of standardised, dissuasive text to be printed on each individual cigarette. This position is based on the need to further denormalise smoking, particularly among young people, and support smoking cessation efforts.

ASH Scotland advocates that the cigarette stick itself acts as a potent, mobile advertisement. Coloured filters, brand logos, and sleek white paper design are carefully crafted to maintain brand identity and association, even within a plain pack. These design features can undermine the public health objectives by preserving a last vestige of attractiveness and familiarity. Introducing dissuasive characteristics, such as an unattractive colour like olive green, the removal of branding, and the printing of health warnings directly on the stick, would further degrade the product's symbolic value. This approach is supported by a substantial body of international qualitative and experimental research. Studies, including those from Australia [8] and Canada [9] where dissuasive products have been explored, indicate that such cigarettes are perceived as less appealing, lower in quality, and more harmful by both smokers and non-smokers. This perception is critical for reducing initiation among youth.

Dissuasive cigarettes can act as a direct smoking cessation aid for people who smoke. The constant presence of a negative health message or unappealing colour on every cigarette can disrupt the automatic ritual of smoking and reinforce quit motivations. It serves as an unavoidable cue to reconsider the behaviour at the very moment of consumption. This intervention aligns with the principle of using every available tool to promote the health messages that are proven to work, extending them from the pack to each individual unit of consumption.

As part of a suite of measures, including taxation, smoke and aerosol free environments (SAFE) spaces, and accessible cessation services, dissuasive cigarettes can help accelerate progress towards a tobacco-free generation in Scotland, ensuring that tobacco products are presented in a way that reflects the deadly reality of their use.

Please attach any other information to support your submission. (File upload)

REFERENCES

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[7] WHO 2024. Tobacco: E-cigarettes. World Health Organization: Geneva https://www.who.int/news-room/questions-and-answers/item/tobacco-e-cigarettes

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