

**Title:** The importance of loose tobacco when considering capping pack size

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**Concise statement:** Caps on tobacco pack sizes should include loose tobacco, as pack size varies more for loose tobacco than factory-made cigarettes. This may simplify purchase decisions for consumers and inventory management for retailers. Standardising pack dimensions as well as the quantity of product within packs would further limit the potential of tobacco companies to use the packaging as a promotional tool.

## **The importance of loose tobacco when considering capping pack size**

The dearth of research, or even debate, on the impact of larger tobacco pack sizes on smoking behaviour may explain, at least in part, why few countries have set a maximum pack size for tobacco products. Blackwell et al [1] understandably focus on factory-made cigarettes, which continue to dominate the global nicotine market. We instead consider loose tobacco, i.e. roll-your-own (RYO) tobacco, which is typically rolled in a cigarette paper, and make-your-own (MYO) tobacco, which is typically inserted into an empty cigarette tube using a portable cigarette making machine. The largest markets for RYO, the most popular form of loose tobacco, are in Western Europe [2], but sales of RYO are reportedly increasing in Central and Eastern Europe, South America [3], Asia [4] and Oceania [5], and it is currently the fastest growing tobacco category in the Middle East and Africa [6].

Whereas single cigarette packs can contain from 5 to 50 cigarettes, depending on the country, they more typically have between 10 and 25 cigarettes and, in many countries, 20-packs are the standard. The range for loose tobacco is far greater. Prior to the Tobacco Products Directive, which set a minimum pack size of 30 grams for loose tobacco, single packs in the European Union (EU) contained from 5 to almost 500 grams, coming in rectangular or standing pouches, cigarette style packs, tins, and square or cylindrical tubs and bucket packs. While smaller packs (e.g. 5 grams, 8 grams, 9 grams, 10 grams, 12.5 grams, 25 grams) are no longer sold in the EU, larger packs can still be used as a competitive tool. Figure 1 shows a selection of loose tobacco packs containing 30 grams or more.

The limited evidence available suggests that people smoke more cigarettes when using larger packs [1], which is consistent with the marketing literature [7]. Whether larger packs of loose tobacco are also associated with greater consumption is not known. However, it is plausible given that consumers are not only paying less per gram, as larger packs generally

provide better per unit value [8], but they are also paying less for a loose cigarette than for a factory-made cigarette, and are less likely to be concerned about running out of the product.

**Figure 1:** Example of the type, and size, of packs of loose tobacco in Western Europe



Different pack sizes allow consumers to purchase products in a size most convenient and affordable to them. However, fixed pack sizes for cigarettes and loose tobacco may also benefit consumers as there would no longer be an array of pack sizes that make it challenging to calculate the cost per cigarette or per gram. The packs of loose tobacco shown in Figure 1 add

to this challenge as they not only contain different weights of tobacco but also describe this weight differently. Some display the weight in grams, some in litres, and some indicate how many cigarettes could be made based on the quantity of tobacco contained within the pack.

Retailers may also benefit from a maximum pack size. In an interview study with retailers in the UK, conducted after the introduction of a minimum pack size for cigarettes and loose tobacco, some retailers said that minimum pack sizes had made ordering and storage easier as there were fewer pack sizes on offer [9]. We suggest that stipulating fixed pack quantities may also simplify inventory management.

While fixing the quantity of product within a pack reduces the ability of tobacco companies to create value and differentiate brands, there is still considerable variation in pack appearance unless fixed pack dimensions are also stipulated. Just as slimmer cigarettes (slims, demislms, superslms and microslms), one of the fastest growing segments in the global cigarette market [10], come in slimmer packs, the length of cigarettes (typically from 70mm to 120mm) dictates the length of packs. These different pack sizes, resulting from cigarette geometry, can allow shelf standout, generate interest, mislead about product harm, grow brand lines, and facilitate inter- and intra-brand differentiation [11]. In a market with fixed pack quantities, further innovation in cigarette geometry, and therefore pack dimensions, is likely. As such, capping pack size as well as standardising pack dimensions may be most effective in further limiting the ability of tobacco companies to promote their products.

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