

# STATUS OF TOBACCO CONTROL LAWS IMPLEMENTATION

Monitoring Report 2023

*Heartfile*





# STATUS OF TOBACCO CONTROL LAWS IMPLEMENTATION

## Monitoring Report 2023

Abbottabad, Attock, Gujranwala, Hyderabad,  
Islamabad, Karachi, Lodhran, Multan,  
Peshawar, Rawalpindi

*Heartfile*



## Table of Contents

i.	Introduction:	1
ii.	Study objectives:	2
iii.	Methodology:	2
	● Tobacco control laws observed:	3
iv.	National level findings:	4
	● Smoking in public places	4
	● Total Smoke-free public places-national:	6
	● Compliance by public place type:	6
	● Smoking in public service vehicles:	9
	● Total Smoke-free public service vehicles:	10
	● Compliance by PSV type:	11
	● Sales and TAPS restrictions at retail outlets:	12
	● Ban on Tobacco Advertising, Promotion and Sponsorship (TAPS):	14
v.	District level findings:	16
	● Abbottabad:	16
	● Peshawar:	19
	● Rawalpindi:	22
	● Multan:	25
	● Attock:	27
	● Gujranwala:	30
	● Lodhran:	33
	● Hyderabad:	36
	● Karachi:	39
	● Islamabad:	42
vi.	Summary of Findings:	46
vii.	Recommendations:	47



## List of Table

<b>Table 1:</b>	Sampling distribution of public places - National .....	4
<b>Table 2:</b>	Compliance of public places with TCLs by area - National .....	5
<b>Table 3:</b>	Smoke - free public places by type - National .....	6
<b>Table 4:</b>	Sampling distribution of public service vehicles - National.....	9
<b>Table 5:</b>	Compliance of PSVs with TCLs by area - National .....	10
<b>Table 6:</b>	Smoke free PSVs by type - National .....	10
<b>Table 7:</b>	Compliance with TCLs at retail outlets by TCL area - National .....	13
<b>Table 8:</b>	Compliance with ban on TAPS in marketplaces by TCL area - National .....	14
<b>Table 9:</b>	Compliance with TCLs in public places by TCL area - Abbottabad .....	16
<b>Table 10:</b>	Compliance with TCLs in PSVs by TCL area - Abbottabad .....	17
<b>Table 11:</b>	Compliance with TCLs at retail outlets by TCL area - Abbottabad .....	17
<b>Table 12:</b>	Compliance with ban on TAPS in marketplaces by TCL area - Abbottabad .....	18
<b>Table 13:</b>	Compliance with TCLs in public places by TCL area - Peshawar .....	19
<b>Table 14:</b>	Compliance with TCLs in PSVs by TCL area - Peshawar .....	20
<b>Table 15:</b>	Compliance with TCLs at retail outlets by TCL area - Peshawar .....	20
<b>Table 16:</b>	Compliance with ban on TAPS in marketplaces by TCL area - Peshawar.....	21
<b>Table 17:</b>	Compliance with TCLs in public places by TCL area - Rawalpindi .....	22
<b>Table 18:</b>	Compliance with TCLs in PSVs by TCL area - Rawalpindi .....	23
<b>Table 19:</b>	Compliance with TCLs at retail outlets by TCL area - Rawalpindi .....	23
<b>Table 20:</b>	Compliance with ban on TAPS in marketplaces by TCL area - Rawalpindi .....	24
<b>Table 21:</b>	Compliance with TCLs in public places by TCL area - Multan .....	25
<b>Table 22:</b>	Compliance with TCLs in PSVs by TCL area - Multan .....	26
<b>Table 23:</b>	Compliance with TCLs at retail outlets by TCL area - Multan .....	26
<b>Table 24:</b>	Compliance with ban on TAPS in marketplaces by TCL area - Multan.....	27
<b>Table 25:</b>	Compliance with TCLs in public places by TCL area - Attock .....	28
<b>Table 26:</b>	Compliance with TCLs in PSVs by TCL area - Attock .....	28
<b>Table 27:</b>	Compliance with TCLs at retail outlets by TCL area - Attock .....	29
<b>Table 28:</b>	Compliance with ban on TAPS in marketplaces by TCL area - Attock .....	30
<b>Table 29:</b>	Compliance with TCLs in public places by TCL area - Gujranwala .....	31
<b>Table 30:</b>	Compliance with TCLs in PSVs by TCL area - Gujranwala .....	31
<b>Table 31:</b>	Compliance with TCLs at retail outlets by TCL area - Gujranwala .....	32
<b>Table 32:</b>	Compliance with ban on TAPS in marketplaces by TCL area - Gujranwala .....	33
<b>Table 33:</b>	Compliance with TCLs in public places by TCL area - Lodhran .....	34
<b>Table 34:</b>	Compliance with TCLs in PSVs by TCL area - Lodhran .....	34
<b>Table 35:</b>	Compliance with TCLs at retail outlets by TCL area - Lodhran .....	35
<b>Table 36:</b>	Compliance with ban on TAPS in marketplaces by TCL area - Lodhran.....	36
<b>Table 37:</b>	Compliance with TCLs in public places by TCL area - Hyderabad .....	37
<b>Table 38:</b>	Compliance with TCLs in PSVs by TCL area - Hyderabad .....	37
<b>Table 39:</b>	Compliance with TCLs at retail outlets by TCL area - Hyderabad .....	38
<b>Table 40:</b>	Compliance with ban on TAPS in marketplaces by TCL area - Hyderabad .....	39
<b>Table 41:</b>	Compliance with TCLs in public places by TCL area - Karachi .....	40
<b>Table 42:</b>	Compliance with TCLs in PSVs by TCL area - Karachi .....	40

<b>Table 43:</b> Compliance with TCLs at retail outlets by TCL area - Karachi .....	41
<b>Table 44:</b> Compliance with ban on TAPS in marketplaces by TCL area - Karachi .....	42
<b>Table 45:</b> Compliance with TCLs in public places by TCL area - Islamabad .....	43
<b>Table 46:</b> Compliance with TCLs in PSVs by TCL area - Islamabad .....	43
<b>Table 47:</b> Compliance with TCLs at retail outlets by TCL area - Islamabad .....	44
<b>Table 48:</b> Compliance with ban on TAPS in marketplaces by TCL area - Islamabad .....	45

### **List of Figures:**

<b>Figure 1:</b> Staff awareness of ban on smoking in public places by type .....	7
<b>Figure 2:</b> Display of no-smoking sign by public place type .....	7
<b>Figure 3:</b> People found smoking in public place by public place/venue type .....	8
<b>Figure 4:</b> Staff found smoking in public place by public place type .....	9
<b>Figure 5:</b> Driver smoking in PSV at time of visit by PSV type - national .....	11
<b>Figure 6:</b> Conductor smoking in PSV at time of visit by PSV type - national .....	11
<b>Figure 7:</b> Passenger(s) smoking in PSV at time of visit by PSV type - national .....	12
<b>Figure 8:</b> Giveaways/gifts/lucky draw prizes in Peshawar .....	15
<b>Figure 9:</b> Giveaways/gifts/lucky draw prizes in Gujranwala .....	15



## **Acknowledgements:**

This document has been produced with the support of a grant from Vital Strategies on behalf of Bloomberg Philanthropies. The contents of this document are the sole responsibility of the authors and can under no circumstances be regarded as reflecting the positions of the Donors.

Mr. Ammar Rashid, Research Lead at Heartfile, authored this report, with significant contributions from Dr. Saba Amjad and Mr. Ihtiram Khattak (Heartfile). The design of the survey instrument and the collection of field data were supported by the Tobacco Smoke Free Cities Initiative and Association for Better Pakistan. On behalf of Vital Strategies, Mr. Ashish Kumar Pandey (Deputy director Tobacco Control), Mr. Khurram Hashmi (Senior Technical Advisor Tobacco Control) and Mr. Faheem Ahmed Akhtar (Technical Officer - Policy Implementation) provided technical inputs to enhance the development of the study.

## i. Introduction:

Over the course of the last two decades, Pakistan has enacted a number of tobacco control laws (TCLs) at the federal and provincial levels, which have been devised to meet Pakistan's Framework Convention on Tobacco Control (FCTC) commitments with respect to tobacco control. Much of this legislation from recent decades has been principally structured around the milestone 'Prohibition of Smoking and Protection of Non-Smokers' Ordinance in 2002, which banned smoking in public places and public service vehicles, placed heavy restrictions on advertisement of tobacco products, restricted sales and distribution of tobacco products (including ban on sales to minors and proximity of tobacco retailers to educational institutions), and put in place strict penalties for violation.

In subsequent years, this law was strengthened and supplemented, including the introduction of graphic health warnings, enhanced restrictions on tobacco advertising, promotion and sponsorships, ban on sales of loose cigarettes, expanded definition of public places prohibiting smoking, ban on marketing of tobacco products targeted at minors and youth, and enactment of excise stamps for track-and-trace mechanisms, among others. Despite increasingly strict TCLs and regulatory restrictions, implementation of TCLs has remained a challenge in districts across the country, owing to both gaps in awareness and enforcement capacity. The Tobacco Smoke Free Cities (TSFC) Initiative is a recent policy initiative by the Government of Pakistan to monitor and implement tobacco control laws at the district level in partnership with local authorities.

The purpose of this monitoring exercise was to support the TSFC to gather evidence on the implementation of the Tobacco Control Laws (TCLs) related to smoke-free places, smoke-free public service vehicles, point of sale restrictions, ban on sales to minors, graphic health warnings, tobacco advertising, promotions, and sponsorships in 10 districts in Pakistan (including Abbottabad, Peshawar, Rawalpindi, Multan, Attock, Gujranwala, Lodhran, Hyderabad, Karachi, and Islamabad). It also aims to enable and support the development of sound policies necessary to improve TCLs regulations and prevent tobacco use among youth.

Led by Heartfile, multiple Tobacco Control civil society partners of The International Union against Tuberculosis and Lung Disease administered this TCL monitoring survey with a target of covering 50 sites/forms per district. The survey was designed to assess compliance with key sections of tobacco control laws in Pakistan, including the Prohibition of Smoking and Protection of Nonsmokers Health Ordinance 2002', SRO 1086 (I)/2013 on ban on tobacco product advertisements in print, electronic and outdoor media, SRO No.86, 87 (KE)/2009 on Printing of pictorial health warning on Cigarette packs, SRO 415(I)/2018 on Ban on Sale of Cigarettes in Loose Form (open cigarette sticks) and SRO 72(I)/2020 on Ban on Tobacco Advertisement, Promotion and Sponsorship (TAPS) and Point-of-Sale (POS) advertising.

It is hoped that the results of this research will not only help evaluation of implementation of TCLs in these districts but will also help generating baseline data to track progress and identifying current gaps and areas where action is needed.

## ii. Study objectives:

The main objectives of this monitoring study are collection of data and analysis of information from ten different districts in Pakistan (including Abbottabad, Peshawar, Rawalpindi, Multan, Attock, Gujranwala, Lodhran, Hyderabad, Karachi, and Islamabad) on:

1. The overall status of TCLs implementation in public places, Public Service Vehicles (PSVs), retail outlets and marketplaces.
2. Awareness of responsible staff at public places and PSVs regarding TCLs.
3. Compliance with advertising and marketing restrictions for tobacco products.
4. Compliance with point-of-sale restrictions on tobacco products at retail outlets.
5. Compliance with graphic health warnings and excise stamp packaging requirements for cigarettes.
6. The current ease of access to tobacco products for minors.

It is anticipated that the data gathered as part of this exercise can serve as a monitoring baseline for TCLs implementation in districts where there is inadequate reporting and monitoring of data on TCLs.

## iii. Methodology:

Heartfile conducted a cross sectional survey between September to November 2023, among public places, public service vehicles, retail outlets and marketplaces (50 sites in total per district). The sample size for the study was 196 public places, 90 public service vehicles, 152 retail outlets and 78 marketplaces across the 10 districts. Districts were selected in consultation with TSFC and TCC partners based on key districts for which TCLs monitoring exercises had not yet been conducted. For each district, the ideal sample distribution aimed at was 13 public places, 13 public service vehicles, 12 retail outlets and 12 marketplaces. Since different public places operate at different times of the day, and the smoking habits of people vary depending on the time of the day, time location sampling was utilized to identify the appropriate time of observation for a particular site.

Data collection was comprised of two parts: i) observation of public places, PSVs, retail outlets and marketplaces for examining direct and indirect evidence of smoking, compliance with signage restrictions and compliance with sales, packaging and advertising regulations and ii) short interviews with responsible staff in public places, public service vehicles and retail outlets regarding awareness of TCLs and compliance with TCLs.

Data were collected by surveyors using a monitoring tool adapted from guides developed by the government's Tobacco Smoke Free Cities project as well as guides developed by the Campaign for Tobacco-Free Kids, and International Union against Tuberculosis and Lung Disease. A data collection portal based on Google Forms was utilized to streamline the uploading of data. The surveyors uploaded the data directly to the configured protected excel worksheet on portals using specific login credentials unique to each data collector. Descriptive statistics like frequencies for qualitative variables and proportions for

quantitative variables were drawn from the observations and interviews done. The data was analyzed with respect to compliance of the tobacco control laws listed below.

The list of cities surveyed included: -

1. Abbottabad
2. Attock
3. Gujranwala
4. Hyderabad
5. Islamabad
6. Karachi
7. Lodhran
8. Multan
9. Peshawar
10. Rawalpindi

### Tobacco control laws observed:

The following tobacco control laws were selected for observation of compliance for the purpose of this study:

1. Section 05 of Prohibition of Smoking and Protection of Non-smokers Health Ordinance 2002 on prohibition of smoking and other tobacco use in public places.
2. Section 06 of Prohibition of Smoking and Protection of Non-smokers Health Ordinance 2002 on prohibition of smoking and other tobacco use in public service vehicles
3. Section 07 of Prohibition of Smoking and Protection of Non-smokers Health Ordinance 2002, which refers to prohibition of advertisement and promotion of tobacco and tobacco products on any media including public places.
4. Section 08 of Prohibition of Smoking and Protection of Non-smokers Health Ordinance 2002, which refers to prohibition of sale of cigarettes, etc., to minors.
5. Section 09 of Prohibition of Smoking and Protection of Non-smokers Health Ordinance 2002, which refers to prohibition of storage, sale and distribution of cigarettes, etc., within 50 meters vicinity of educational institutions.
6. Section 10 of Prohibition of Smoking and Protection of Non-smokers Health Ordinance 2002, which refers to displaying and exhibition of board prominently stating “No Smoking Zone” or “Smoking is an offense”.
7. SRO 1086 (I)/2013 on Ban on tobacco product advertisements in print, electronic and outdoor media

8. SRO No.86, 87 (KE)/2009 on Printing of pictorial health warning on Cigarette packs.

9. SRO 415(I)/2018 on Ban on Sale of Cigarettes in Loose Form (open cigarette sticks).

10. SRO 72(I)/2020 on Ban on TAPS and POS advertising.

## iv. National level findings:

### Smoking in public places

Among public places surveyed across the country, the most common venue type sampled were food outlets (18%), bus/train stations (15%), educational institutions (12%), and Hospitals (12%), followed by other types, including government offices (9%), banks (8%), private offices (7%), shopping malls (7%), entertainment venues (6%), accommodation/hotels (2%), court premises (2%), and sports venues/stadiums (2%). Compliance of public places was assessed with respect to Section 05 of Prohibition of Smoking and Protection of Non-smokers Health Ordinance 2002 on prohibition of smoking and other tobacco use in public places and Section 10 of Prohibition of Smoking and Protection of Non-smokers Health Ordinance 2002, which refers to displaying and exhibition of board prominently stating “No Smoking Zone” or “Smoking is an offense”.

Table 1: Sampling distribution of public places - National

Serial No.	Public place	Total (n)	% of sample
1	Accommodation/Hotel	4	2%
2	Bank	15	8%
3	Bus/train station	30	15%
4	Court premises	4	2%
5	Food Outlets/Eatery	35	18%
6	Educational institution	24	12%
7	Entertainment venue (Theatre/Cinema/Amusement Park)	12	6%
8	Government office	18	9%
9	Hospital	24	12%
10	Private office	14	7%
11	Shopping mall	12	7%
12	Sports venue/stadium	4	2%
Total public places		196	



High levels of non-compliance with TCLs on smoking in public places were found across districts surveyed. While the majority of responsible staff (85%) was aware of the ban on smoking in public places, widespread violations were found to be commonplace at the time of visit by surveyors. Roughly only a quarter (26%) of public places had 'No Smoking' boards visible; nearly half (45%) of public places surveyed had people smoking in non smoking areas at the time of visit; over 20% had staff smoking in the non-smoking area; over 45% had cigarette butts visible in the non smoking area, while around 11% venues had ashtrays or matches visible. Designated smoking areas were found to be relatively rare, with only 1% of public places having instituted one.

*Table 2: Compliance of public places with TCLs by area - National*

Area of TCL for public places	Number (n =196)	Percentage of public places in compliance with TCL	Percentage of public places in violation of TCL
Public places with 'No Smoking' boards displayed	51	26%	74%
Public places where people were found smoking in the non-smoking area at the time of visit	89	55%	45%
Public places where staff was found smoking in non-smoking area at the time of visit	41	79%	21%
Places with cigarette butts visible in no-smoking area at the time of visit	89	55%	45%
Places with ashtrays or matches visible at the time of visit	22	89%	11%
Designated smoking area in the public place	2	99%	1%
Staff aware of ban on smoking in public places	167	85%	15%

### Total Smoke -free public places - national:

According to the TSFC's criteria for determining a public place to be smoke-free (no one observed smoking, no cigarette butts or ashtrays found, and 'no smoking' sign in place), only 23 public places (12% of the total venues surveyed) across the country could be considered smoke-free, including 4 in Rawalpindi, 3 in Gujranwala, 2 in Peshawar, 3 in Karachi, 4 in Hyderabad, 3 in Multan, and 3 in Islamabad.

Out of the total public places surveyed around the country, 53% of banks, 25% of sports/venues, 17% of shopping malls, 13% of hospitals, 13% of educational institutions, 9% of food outlets/eateries, 7% of bus/train stations and 6% of government offices were smoke free as per the TSFC's criteria. No accommodation/hotels, court premises, entertainment venues, or private office was found to be smoke-free in any district across the country.

Table 3: Smoke-free public places by type - National

Public place category	Number of smoke-free places	Smoke-free places as percentage of total places surveyed	Non-Smoke-free places as percentage of total places surveyed
Accommodation/hotel	0	0%	100%
Bank	8	53%	47%
Bus/train station	2	7%	93%
Court premises	0	0%	100%
Eatery (Restaurant/Dhaba/Café)	3	9%	91%
Educational institution	3	13%	87%
Entertainment venue	0	0%	100%
Government office	1	6%	94%
Hospital	3	13%	87%
Private office	0	0%	100%
Shopping mall	2	17%	83%
Sports venue/stadium	1	25%	75%
<b>Total smoke-free places</b>	<b>23</b>	<b>12%</b>	<b>88%</b>

### Compliance by public place type:

Knowledge of the ban on public smoking varied somewhat by place, with staff at shopping malls (62%), bus/train stations (60%), entertainment venues (72%) and eateries (70%) being less aware of prohibitions on public smoking compared to staff at other venues. However, as the rest of the survey findings in public places indicate, knowledge of ban by the staff is not a sufficient condition for implementation of smokefree policies.

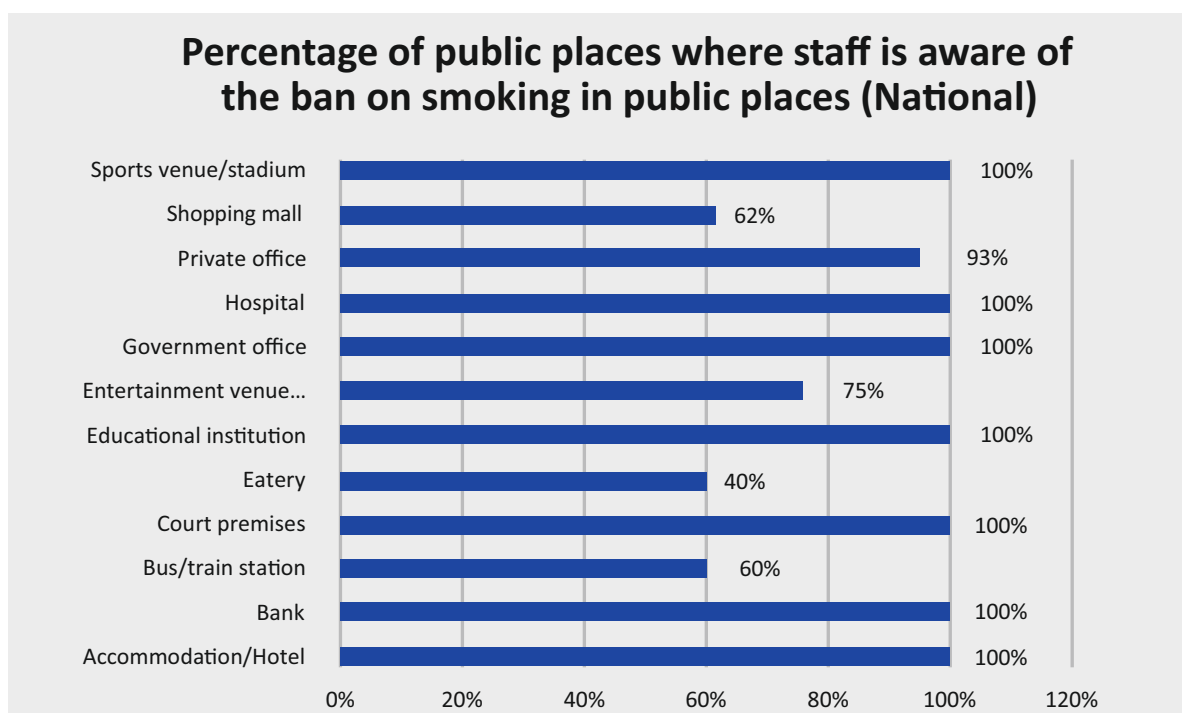


Figure 1: Staff awareness of ban on smoking in public places by type.

Low compliance exists across districts for display of 'no smoking' boards at public places among all categories. Hotels, Private offices, eateries and bus/train stations are found to have the lowest levels of compliance for signage requirements, followed by government offices, educational institutions, court premises and hospitals.

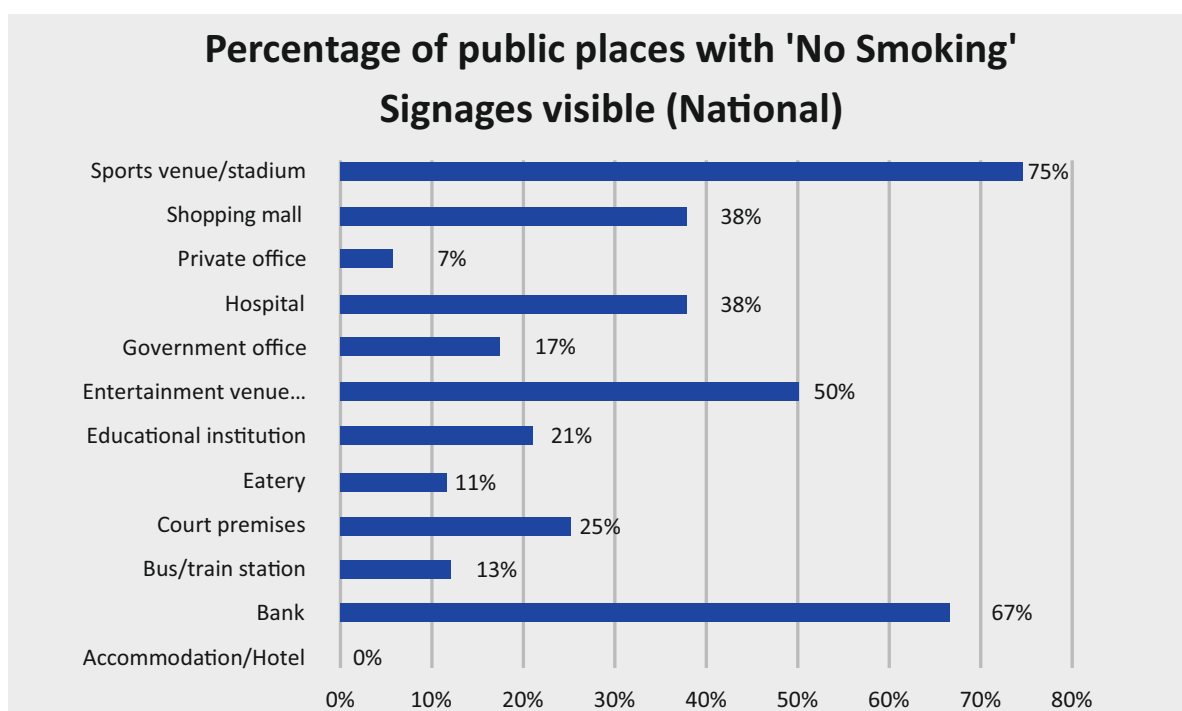


Figure 2: Display of no-smoking sign by public place type.

People were found smoking at the time of visit in all categories of public places surveyed. Court premises were the most common sources of violations, followed by accommodation/hotels, entertainment venues, bus/train stations, shopping malls and sports stadiums. In addition, the observation of staff found smoking was most commonly prevalent in court premises, bus/train stations, private offices and hospitals.

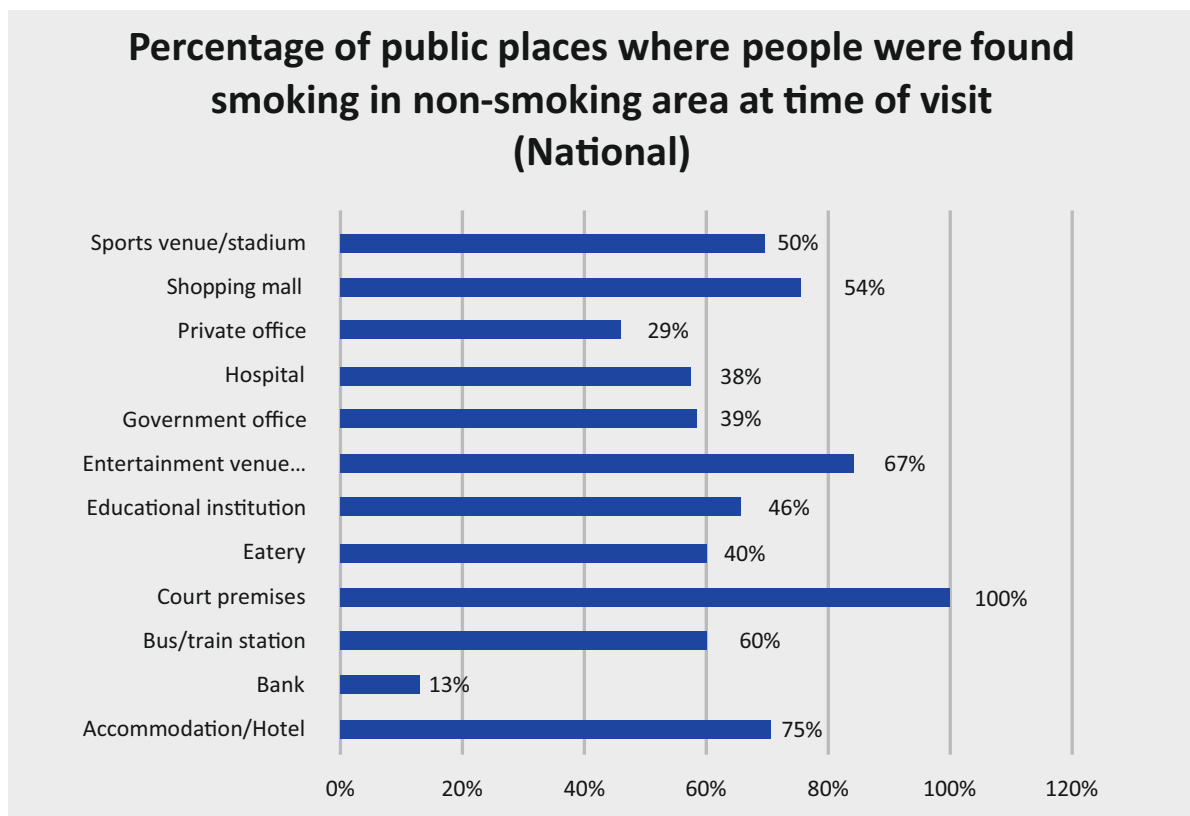


Figure 3: People found smoking in public place by public place/venue type.

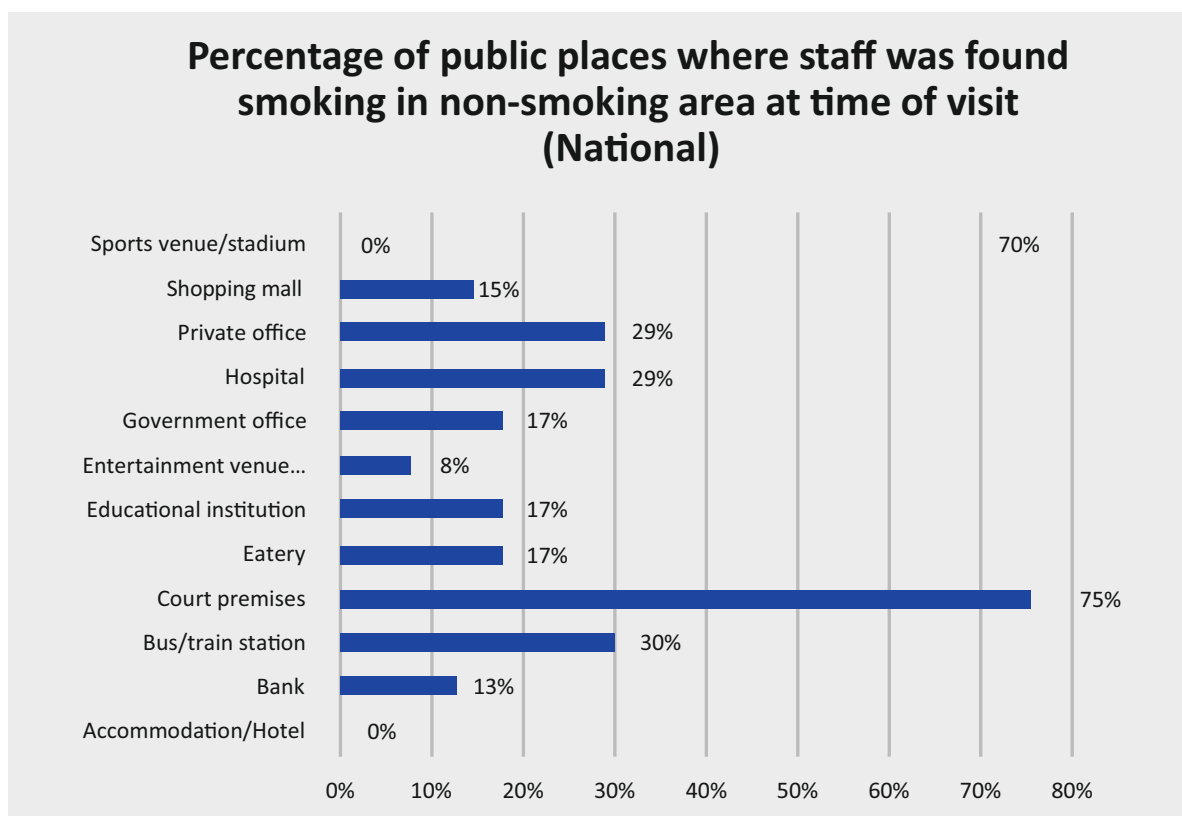


Figure 4: Staff found smoking in public place by public place type.

#### Smoking in public service vehicles:

A total of 90 public service vehicles (PSVs) were surveyed across the country for the purpose of the study. The most common type of PSVs surveyed were Vans (often referred to as 'Hiaces') at 41% of the sample, followed by inter-city buses (26%), local buses (11%), Metros (10%), and other assorted PSV types (including Chingqis, Suzukis and others) (10%). Compliance was assessed against Section 06 of the Tobacco Control ordinance on prohibition on smoking and other tobacco use in PSVs.

Table 4: Sampling distribution of public service vehicles - National

Type of PSV	Number (n=90)	Percentage of sample
Bus (Local)	10	11%
Bus (Inter-city)	23	26%
Train	2	2%
Metro	9	10%
Van	37	41%
Others (Public service Chingqis, Suzukis, etc)	9	10%

Compliance with TCLs in public service vehicles was low across the board at the national level. A significant 44% of PSV drivers were found smoking in the vehicle at the time of visit, along with 26% of conductors and 33% of passengers, suggesting a startling degree of non-compliance by PSV staff. Only 22% of PSVs had signage prohibiting smoking. At the same time, a large proportion of PSV staff (drivers plus conductors) were aware of the ban on smoking in PSVs, suggesting that knowledge of the ban is less of a concern than enforcement.

Table 5: Compliance of PSVs with TCLs by area - National

Area of TCL for PSVs	Number (N=90)	Percentage of PSVs in compliance with TCL	Percentage of PSVs in violation of TCL
Driver found smoking in PSV at time of visit	40	56%	44%
Conductor found smoking in PSV at time of visit	23	74%	26%
Passenger found smoking in PSV at time of visit	30	67%	33%
"No smoking" sign visible in PSV	20	22%	78%
PSV staff aware of ban on smoking in PSVs	64	71%	29%

### Total Smoke-free public service vehicles:

A total of 15 PSVs (17% of total PSVs surveyed) were found to be compliant with the ban on smoking in PSVs (no person found smoking in PSV and 'no smoking' sign on display). There was 100% compliance in all Metro PSVs surveyed, with low compliance in inter-city buses (17%), local buses (10%) and vans (3%). 0% compliance with TCLs was witnessed in trains and other forms of public transport (including Chinggis and Suzukis, etc.).

Islamabad was the district with the highest level of smoke free PSVs (88% of those observed), followed by Peshawar (40%), Multan (33%), Lodhran (18%) and Karachi (14%). NoPSVs were fully compliant with TCLs in Abbottabad, Rawalpindi, Attock, Gujranwala, and Hyderabad.

Table 6: Smoke-free PSVs by type - National

Type of PSV	Number in compliance with ban on smoking in PSV	Smoke-free PSVs as percentage of total	Non-Smoke-free PSVs as percentage of total
Bus (Local)	1	10%	90%
Bus (Inter-city)	4	17%	83%
Train	0	0%	100%
Metro	9	100%	0%
Van	1	3%	97%
Others	0	0%	100%
<b>Total Smoke-free PSVs</b>	<b>15</b>	<b>17%</b>	<b>83%</b>

### Compliance by PSV type:

Among different types of PSVs, the highest percentage of violations were found in local buses and vans. 70% of drivers, 30% of conductors and 50% of passengers of local buses were found smoking at the time of visit, whereas 56% of drivers, 32% of conductors and 34% of passengers of vans were found smoking in PSVs at the time of visit.

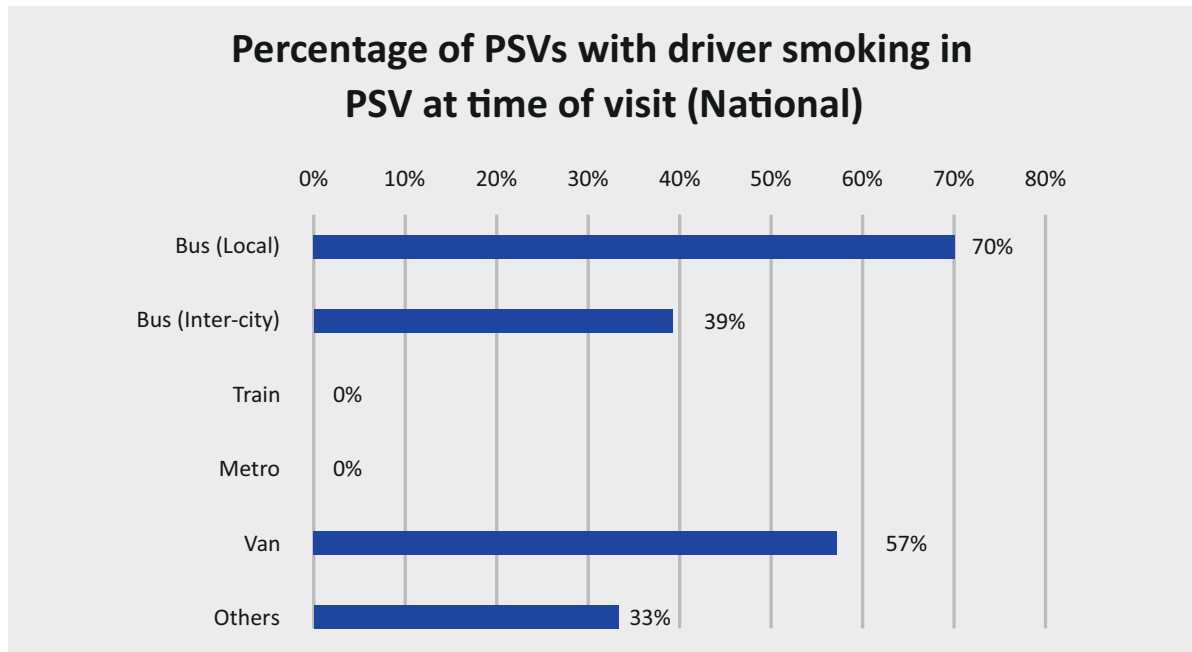


Figure 5: Driver smoking in PSV at time of visit by PSV type - National

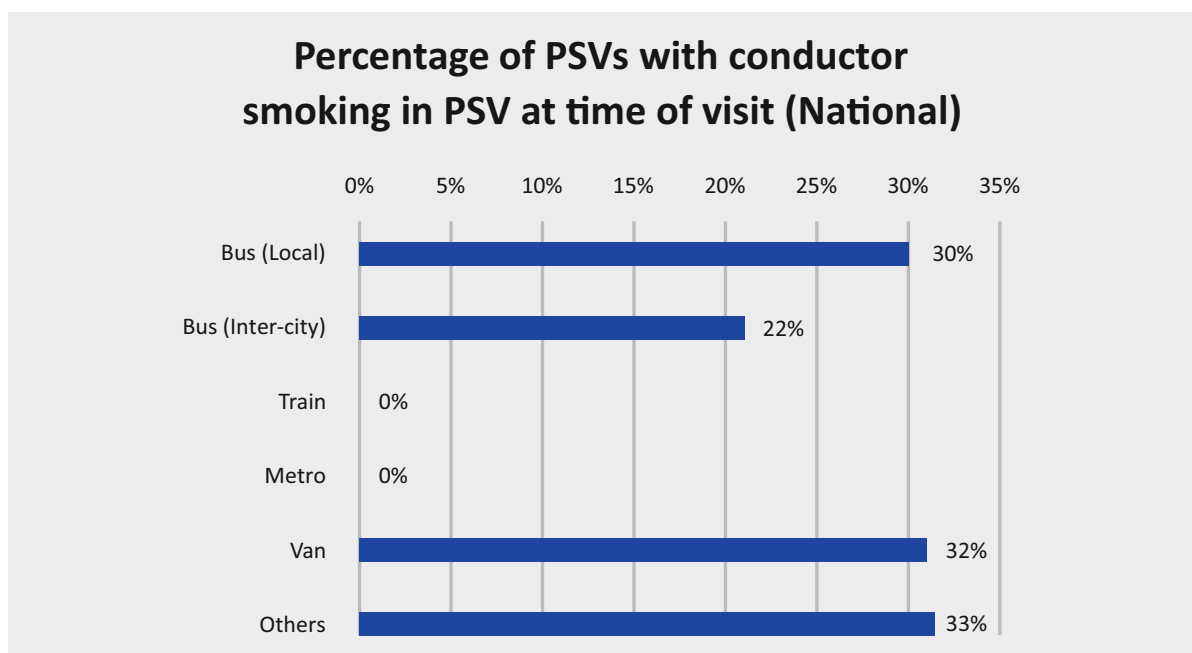


Figure 6: Conductor smoking in PSV at time of visit by PSV type - National

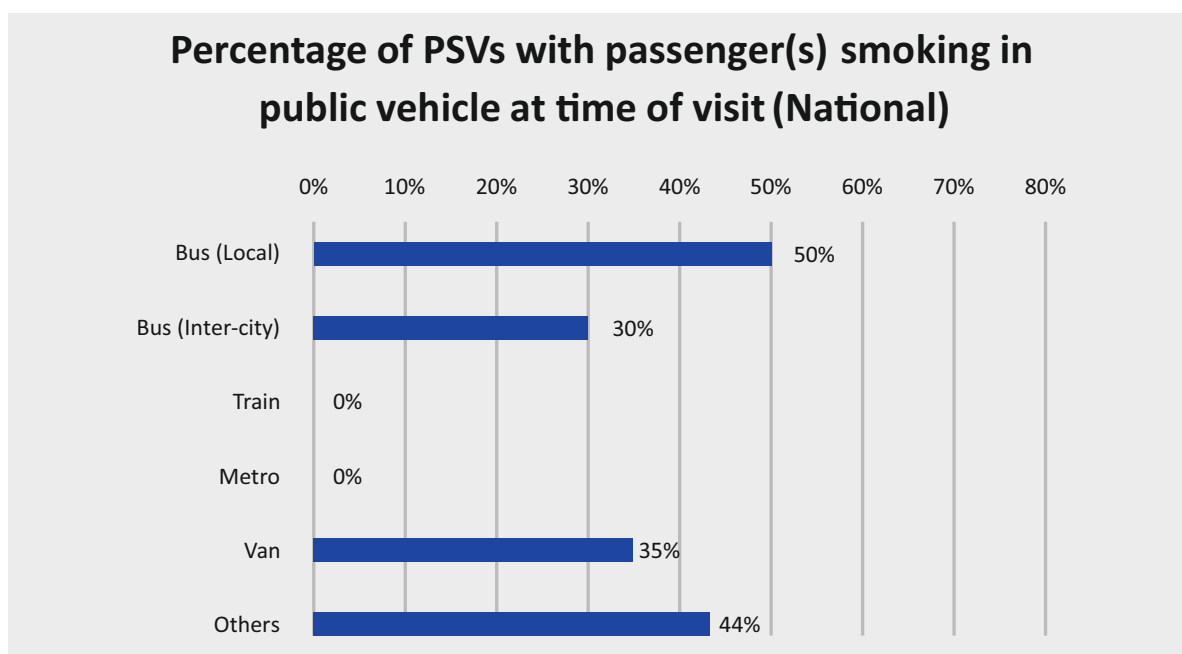


Figure 7: Passenger(s) smoking in PSV at time of visit by PSV type - National

#### **Sales and TAPS restrictions at retail outlets:**

A total of 152 retail outlets selling tobacco products were surveyed across the country. Compliance for sales and TAPS restrictions was observed for Section 08 of Prohibition of Smoking and Protection of Non-smokers Health Ordinance 2002 on prohibition of sale of cigarettes, etc., to minors, Section 09 of Prohibition of Smoking and Protection of Nonsmokers Health Ordinance 2002 on prohibition of storage, sale and distribution of cigarettes, etc., in the immediate vicinity of educational institutions, SRO 72(I)/2020 on Ban on TAPS and POS advertising, SRO No.86, 87 (KE)/2009 on Printing of pictorial health warning on Cigarette packs, and SRO 415(I)/2018 on Ban on Sale of Cigarettes in Loose Form (open cigarette sticks).

A large proportion of retail outlets selling cigarettes surveyed across the country were in violation of prohibitions on sales to minors, advertising restrictions on tobacco products, graphic health warning requirements and proximity to educational institutions. Sales to minors were taking place at the time of visit at 36% of retail outlets surveyed, with only 3% of outlets using ID cards to verify the ages of cigarette buyers. Further, less than a fifth (18%) of retail outlets had a sign indicating a ban on sales to persons under 18. A large majority – 63% - of retail outlets selling tobacco products had cigarettes placed next to candies, snacks or children's products. Further, loose cigarettes were available for sale at 67% of outlets surveyed.

Cigarette packs without graphic health warnings were available in 20% of retail outlets while cigarette packs without track and trace excise stamps were available for sale in 24% of retail outlets surveyed. Brands without legally-mandated health warnings or excise stamps included both imported brands as well as local brands. Point-of-Sale advertising restrictions continue to be violated at a significant number of retail outlets. 31% of retail outlets surveyed had cigarette advertisements outside the outlet whereas 19% had cigarette advertisements inside the store.



Over 42% of retail outlets surveyed across the country were in violation of prohibitions on sale of cigarettes and tobacco products within 50 meters of educational institutions.

Table 7: Compliance with TCLs at retail outlets by TCL area - National

Area of TCL for retail outlets	Percentage of retail outlets in compliance with TCL	Percentage of retail outlets in violation of TCL
Sales to minors taking place at time of visit	74%	36%
Vendors checking ID cards of cigarette buyers	3%	97%
'No sales to Persons under 18' sign on display	18%	82%
Cigarette packs without graphic health warnings are available for sale	80%	20%
Cigarette packs without excise stamps are available for sale	76%	24%
Loose cigarettes are available for sale	33%	67%
Cigarettes placed next to candies, snacks or children's products	37%	63%
Cigarettes advertised outside of store	69%	31%
Other tobacco products advertised outside the store	81%	19%
Cigarettes advertised inside store	83%	17%
Special promotions or discounts offered for tobacco products	100%	0%
Any gifts/giveaways of tobacco products	100%	0%
Retail outlet located within 50m of an educational institution	58%	42%

### Ban on Tobacco Advertising, Promotion and Sponsorship TAPS:

A total of 78 marketplaces were surveyed across the country to assess compliance with the ban on TAPS. Compliance was specifically assessed with respect to Section 7 of Prohibition of Smoking and Protection of Nonsmokers Health Ordinance 2002 on prohibition of advertisement of tobacco and tobacco products on any media including public places, and SRO 72(I)/2020 on Ban on TAPS and POS advertising.

The TCL area with the highest levels of compliance nationally is the ban on TAPS. The one area of tobacco product advertising where violations remain relatively common is POS advertisements, where violations were observed at 23% of marketplaces surveyed. All POS advertisement violations observed were in the districts of Multan (10 violations), Peshawar (4 violations), Lodhran (3 violations), and Gujranwala (1 violation). Cigarette brands for which POS advertisements were visible included both imported brands as well as local brands.

No billboards, neon signs, fliers, banners or other types of tobacco product advertisements were found in any of the marketplaces surveyed, whereas only one marketplace surveyed in the country had a hanging displayed for another tobacco product. No sponsorships by tobacco companies found taking place, whereas in two marketplaces, giveaways of tobacco products were being advertised as part of a Lucky Draw.

Table 8: Compliance with ban on TAPS in marketplaces by TCL area - National

Area of ban on TAPS	Number of violations (N=78)	Percentage of marketplaces in compliance with TCL	Percentage of marketplaces in Violation of TCL
Billboard (s) with tobacco product advertisements visible in the area	0	100%	0%
Point of sale tobacco product advertisement visible in the area	18	77%	23%
Neon sign (s) with tobacco product advertisement visible in area	0	100%	0%
Hanging(s) with tobacco product advertisements visible in the area	1	99%	1%
Flier(s) with tobacco product advertisements visible in the area	0	100%	0%
Banner(s) with tobacco product advertisements visible in the area	0	100%	0%
Other types of tobacco product advertising visible in the area	0	100%	0%
Sports event sponsorship with tobacco product in the area	0	100%	0%
Entertainment event sponsorship with tobacco product in the area	0	100%	0%
Brand stretching (sharing tobacco product logo with other brands) taking place in the area	0	100%	0%

Any giveaways/gifts/samples of tobacco products taking place in the area	2	97%	3%
Promotional items associated with tobacco products taking place in the area	1	99%	1%
Any other promotional practices associated with tobacco products taking place in the area	0	100%	0%



Figure 8: Giveaways/gifts/lucky draw prizes in Peshawar



Figure 9: Giveaways/gifts/lucky draw prizes in Gujranwala

## v. District level findings:

### Abbottabad:

#### Smoking in public places:

While all responsible staff in public places surveyed across Abbottabad were aware of the ban on smoking in public places, compliance remained low across a number of areas. None of the public places surveyed in the district had 'No Smoking' boards visible, whereas 57% had people smoking at the time of visit, while the same percentage also had cigarette butts visible in the no-smoking area.

Table 9: Compliance with TCLs in public places by TCL area - Abbottabad

Area of TCL compliance in public places	Number of observations (N=14)	Percentage of public places in compliance with TCL	Percentage of public places in violation of TCL
Public places with 'No Smoking' boards visible	0	0%	100%
Public places where people were found smoking in the non-smoking area at the time of visit	8	43%	57%
Public places where staff was found smoking in non-smoking area at the time of visit [FAA1] [AR2]	1	93%	7%
Places with cigarette butts visible in no-smoking area at the time of visit	8	43%	57%
Places with ashtrays or matches visible at the time of visit	1	93%	7%
Designated smoking area in the public place	0	100%	0%
Staff aware of ban on smoking in public places	14	100%	0%

No public place in Abbottabad fulfilled the official criteria for being declared smoke-free (no one observed smoking, no cigarette butts or ashtrays found, and 'no smoking' sign in place).

#### Smoking in public service vehicles (PSVs):

91% of PSV staff surveyed in Abbottabad were aware of the ban on smoking in PSVs but compliance was again low. Drivers were found smoking in 64%, conductors in 36% and passengers in 18% of PSVs in the district, while only 9% of PSVs had a no-smoking sign displayed.

0% of PSVs in Abbottabad were found to be fully smoke-free in compliance with TCLs (no smoking sign on display and no one found smoking in PSV at time of visit).

Table 10: Compliance with TCLs in PSVs by TCL area - Abbottabad

Area of TCL compliance in PSVs	Number of (N=11)	Percentage of PSVs in compliance with TCL	Percentage of PSVs in violation of TCL
Driver found smoking in PSV at time of visit	7	36%	64%
Conductor found smoking in PSV at time of visit	4	74%	36%
Passenger found smoking in PSV at time of visit	2	82%	18%
"No-smoking" sign visible in PSV	1	9%	91%
PSV staff aware of ban on smoking in PSVs	10	91%	9%

#### Sales and TAPS restrictions at retail outlets:

While no sales to minors were directly observed in retail outlets in Abbottabad at the time of visit, 0% of vendors were found to check ID cards of customers to verify their age and only 54% of retail outlets displayed a 'no sale to person under 18' sign. Loose cigarettes were found on sale at 62% of retail outlets in the district, while cigarettes were placed next to candies, snacks and children's products at 77% of outlets. 92% of retail outlets surveyed in the district were located within 50m of an educational institution. Around 8% of outlets each had cigarette products or tobacco products advertised inside and outside the store.

Table 11: Compliance with TCLs at retail outlets by TCL area - Abbottabad

Area of TCL compliance at retail outlets	Number of retail outlets (N=13)	Percentage of retail outlets in compliance with TCL	Percentage of retail outlets in violation of TCL
Sales to minors taking place at time of visit	0	100%	0%
Vendors checking ID cards of cigarette buyers	0	0%	100%
'No sales to Persons under 18' sign on display	7	54%	46%
Cigarette packs without graphic health warnings are available for sale	0	100%	0%
Cigarette packs without excise stamps are available for sale	1	92%	8%
Loose cigarettes are available for sale	8	38%	62%
Cigarettes placed next to candies, snacks or children's products	10	23%	77%
Cigarettes advertised outside of store	0	100%	0%



Other tobacco products advertised outside the store	1	92%	8%
Cigarettes advertised inside of store	1	92%	8%
Special promotions or discounts offered for tobacco products	0	100%	0%
Any gifts/giveaways of tobacco products	0	100%	0%
Retail outlet located within 50m of an educational institution	12	8%	92%

### Advertising, promotion and sponsorship of cigarettes and tobacco products in market places:

All marketplaces in Abbottabad were found to be compliant with TAPS restrictions on cigarettes and tobacco products, with no violations observed.

Table 12: Compliance with ban on TAPS in marketplaces by TCL area - Abbottabad

Area of TAPS restrictions	Number (N=12)	Percentage of marketplaces in compliance with TCL	Percentage of marketplaces in violation of TCL
Billboard(s) with tobacco product advertisements visible in the area	0	100%	0%
Point of sale tobacco product advertisement visible in the area	0	100%	0%
Neon sign (s) with tobacco product advertisement visible in area	0	100%	0%
Hanging(s) with tobacco product advertisements visible in the area	0	100%	0%
Flier(s) with tobacco product advertisements visible in the area	0	100%	0%
Banner(s) with tobacco product advertisements visible in the area	0	100%	0%
Other types of tobacco product advertising visible in the area	0	100%	0%
Sports event sponsorship with tobacco product in the area	0	100%	0%
Entertainment event sponsorship with tobacco product in the area	0	100%	0%
Brand stretching (sharing tobacco product logo with other brands) taking place in the area	0	100%	0%
Any giveaways/gifts/samples of tobacco products taking place in the area	0	100%	0%
Promotional items associated with tobacco products taking place in the area	0	100%	0%
Any other promotional practices associated with tobacco products taking place in the area	0	100%	0%

## Peshawar:

### Smoking in public places:

95% of staff at public places surveyed in Peshawar were aware of the ban on smoking in public places, but compliance remained low across the district. Only 35% of public places had 'No Smoking' boards visible, while people were found smoking in 30% and staff found smoking in 10% of public places. 50% of public places had cigarette butts visible in the no smoking area at the time of visit while 30% had ashtrays visible.

Table 13: Compliance with TCLs in public places by TCL area - Peshawar

Area of TCL compliance in public places	Number of observations (N=20)	Percentage of compliance with TCL	Percentage of violation of TCL
Public places with 'No Smoking' boards visible	7	35%	65%
Public places where people were found smoking in the non-smoking area at the time of visit	6	70%	30%
Public places where staff was found smoking in non-smoking area at the time of visit	2	90%	10%
Places with cigarette butts visible in no-smoking area at the time of visit	10	50%	50%
Places with ashtrays or matches visible at the time of visit	6	70%	30%
Designated smoking area in the public place	0	100%	0%
Staff aware of ban on smoking in public places	19	95%	5%

A total of 2 public places in Peshawar (1 bank and 1 bus/train station), comprising 10% of total public places surveyed in the district, fulfilled the official criteria for a public place being declared smoke-free (no one observed smoking, no cigarette butts or ashtrays found, and 'no smoking' sign in place).

### Smoking in public service vehicles:

Public service vehicles surveyed in Peshawar were largely in compliance with TCLs (with the caveat that no vans or local buses, which tend to feature high violations, were part of the sample for the district). The only exception to compliance in the sample for the district was the fact that 60% of PSVs did not have 'no smoking' signs.

40% of PSVs in Peshawar were found to be fully smoke-free in compliance with TCLs (no smoking sign on display and no one found smoking in PSV at time of visit).

Table 14: Compliance with TCLs in PSVs by TCL area - Peshawar

Area of TCL compliance in PSVs	Number of (N=5)	Percentage of PSVs in compliance with TCL	Percentage of PSVs in violation of TCL
Driver found smoking in PSV at time of visit	0	100%	0%
Conductor found smoking in PSV at time of visit	0	100%	0%
Passenger found smoking in PSV at time of visit	0	100%	0%
"No-smoking" sign visible in PSV	2	40%	60%
PSV staff aware of ban on smoking in PSVs	5	100%	0%

#### Sales and TAPS restrictions at retail outlets:

While no sales to minors were witnessed at retail outlets at the time of visit in Peshawar, 0% of vendors were found to be checking ID cards to verify age of cigarette buyers and only 8% of retail outlets had 'no sales to persons under 18' signs on display. Cigarettes without graphic health warnings were available at a high 42% of retail outlets in the district, while loose cigarettes were available at 50% of outlets. 17% of outlets had cigarettes placed next to candies, snacks or children's products. 33% of outlets had cigarettes advertised outside and 17% of outlets had cigarettes advertised inside of stores. Gifts/giveaways of tobacco products were taking place in 17% of outlets surveyed. A high 58% of retail outlets surveyed were located within 50m of an educational institution.

Table 15: Compliance with TCLs at retail outlets by TCL area - Peshawar

Area of TCL compliance at retail outlets	Number (N=12)	Percentage of retail outlets in compliance with TCL	Percentage of retail outlets in Violation of TCL
Sales to minors taking place at time of visit	0	100%	0%
Vendors checking ID cards of cigarette buyers	0	0%	100%
'No sales to Persons under 18' sign on display	1	8%	92%
Cigarette packs without graphic health warnings are available for sale	5	58%	42%
Cigarette packs without excise stamps are available for sale	5	58%	42%
Loose cigarettes are available for sale	6	50%	50%
Cigarettes placed next to candies, snacks or children's products	2	83%	17%
Cigarettes advertised outside of store	4	67%	33%
Other tobacco products advertised outside the store	0	100%	0%
Cigarettes advertised inside of store	2	83%	17%



Special promotions or discounts offered for tobacco products	0	100%	0%
Any gifts/giveaways of tobacco products	2	83%	17%
Retail outlet located within 50m of an educational institution	7	42%	58%

#### **Advertising, promotion and sponsorship of cigarettes and tobacco products in marketplaces:**

15% of retail outlets were offering giveaways/gifts/samples of tobacco products as part of a Lucky Draw while 8% were advertising promotional items associated with tobacco products. Other than that, all marketplaces surveyed in the district were in compliance with TAPS ban on cigarettes and tobacco products.

*Table 16: Compliance with ban on TAPS in marketplaces by TCL area - Peshawar*

Area of TAPS restrictions	Number (N=13)	Percentage of marketplaces in compliance with TCL	Percentage of marketplaces in violation of TCL
Billboard(s) with tobacco product advertisements visible in the area	0	100%	0%
Point of sale tobacco product advertisement visible in the area	4	69%	31%
Neon sign (s) with tobacco product advertisement visible in area	0	100%	0%
Hanging(s) with tobacco product advertisements visible in the area	0	100%	0%
Flier(s) with tobacco product advertisements visible in the area	0	100%	0%
Banner(s) with tobacco product advertisements visible in the area	0	100%	0%
Other types of tobacco product advertising visible in the area	0	100%	0%
Sports event sponsorship with tobacco product in the area	0	100%	0%
Entertainment event sponsorship with tobacco product in the area	0	100%	0%
Brand stretching (sharing tobacco product logo with other brands) taking place in the area	0	100%	0%
Any giveaways/gifts/samples of tobacco products taking place in the area	2	85%	15%
Promotional items associated with tobacco products taking place in the area	1	92%	8%
Any other promotional practices associated with tobacco products taking place in the area	0	100%	0%

## Rawalpindi:

### Smoking in public places:

All responsible staff at public places in Rawalpindi were aware of the ban on smoking in public places; however, 68% of said staff was found smoking at the time of visit, in addition to 42% of people overall in public places. In addition, cigarette butts were found in the non-smoking area in 26% and ashtrays were found in the non-smoking area in 11% of public places.

Table 17: Compliance with TCLs in public places by TCL area - Rawalpindi

Area of TCL compliance in public places	Number of observations (N=19)	Percentage of Public places in compliance with TCL	Percentage of Public places in violation of TCL
Public places with 'No Smoking' boards visible	6	32%	68%
Public places where people were found smoking in the non-smoking area at the time of visit	8	58%	42%
Public places where staff was found smoking in non-smoking area at the time of visit	13	32%	68%
Places with cigarette butts visible in no-smoking area at the time of visit	5	74%	26%
Places with ashtrays or matches visible at the time of visit	2	89%	11%
Designated smoking area in the public place	0	100%	0%
Staff aware of ban on smoking in public places	19	100%	0%

A total of 4 public places in Rawalpindi (2 banks, 1 bus/train station and 1 educational institution), comprising 21% of total public places surveyed in the district, fulfilled the official criteria for a public place being declared smoke-free (no one observed smoking, no cigarette butts or ashtrays found, and 'no smoking' sign in place).

### Smoking in public service vehicles:

Compliance of PSVs with TCLs in Rawalpindi district was considerably low. Only 56% of PSV staff were aware of the ban on smoking in PSVs, with 56% of drivers, 67% of conductors and 78% of passengers found smoking in the PSV at the time of visit. None of the PSVs surveyed had no smoking signs displayed.

0% of PSVs in Rawalpindi were found to be fully smoke-free in compliance with TCLs (no smoking sign on display and no one found smoking in PSV at time of visit).

Table 18: Compliance with TCLs in PSVs by TCL area - Rawalpindi

Area of TCL compliance in PSVs	Number (N=9)	Percentage of PSVs	Percentage of PSVs in compliance with TCL	Percentage of PSVs in non-Compliance /violation of TCL
Driver found smoking in PSV at time of visit	5	56%	44%	56%
Conductor found smoking in PSV at time of visit	6	67%	33%	67%
Passenger found smoking in PSV at time of visit	7	78%	22%	78%
“No-smoking” sign visible in PSV	0	0%	0%	100%
PSV staff aware of ban on smoking in PSVs	5	56%	56%	44%

### Sales and TAPS restrictions at retail outlets:

Over two thirds (72%) of retail outlets surveyed in Rawalpindi appeared to be violating the ban on sales to minors at the time of visit. Only 6% of outlets surveyed had a ‘no sales to minors’ sign on display. Packaging requirements were also being violated, with 39% of outlets selling cigarette packs without graphic health warnings and 56% of outlets selling cigarette packs without excise stamps. 67% of retail outlets displayed cigarettes next to candies, snacks or children’s products and 72% were selling loose cigarettes. In terms of advertising, 17% of outlets had cigarette advertisements outside the store while 50% had advertisements inside the store. No special promotions or gifts/giveaways were observed in retail outlets surveyed in Rawalpindi. However, 72% of retail outlets selling tobacco products were located within 50m of an educational institution.

Table 19: Compliance with TCLs at retail outlets by TCL area - Rawalpindi

Area of TC L compliance at retail outlets	Number (N=18)	Percentage of retail outlets in compliance with TCL	Percentage of retail outlets in Violation of TCL
Sales to minors taking place at time of visit	13	28%	72%
Vendors checking ID cards of cigarette buyers	0	0%	100%
‘No sales to Persons under 18’ sign on display	1	6%	94%
Cigarette packs without graphic health warnings are available for sale	7	61%	39%
Cigarette packs without excise stamps are available for sale	10	44%	56%
Loose cigarettes are available for sale	13	28%	72%
Cigarettes placed next to candies, snacks or children’s products	12	33%	67%

<sup>1</sup> 10 vendors claimed they checked ID cards for cigarette buyers ‘sometimes’.

Cigarettes advertised outside of store	3	83%	17%
Other tobacco products advertised outside the store	1	94%	6%
Cigarettes advertised inside of store	9	50%	50%
Special promotions or discounts offered for tobacco products	0	100%	0%
Any gifts/giveaways of tobacco products	0	100%	0%
Retail outlet located within 50m of an educational institution	13	28%	72%

#### **Advertising, promotion and sponsorship of cigarettes and tobacco products in marketplaces:**

No violations of TAPS were observed in marketplaces in Rawalpindi, other than a single hanging for another tobacco-based product at one marketplace.

*Table 20: Compliance with ban on TAPS in marketplaces by TCL area - Rawalpindi*

Area of TAPS restrictions	Number (N=4)	Percentage of marketplaces in compliance with TCL	Percentage of marketplaces in violation of TCL
Billboard(s) with tobacco product advertisements visible in the area	0	100%	0%
Point of sale tobacco product advertisement visible in the area	0	100%	0%
Neon sign (s) with tobacco product advertisement visible in area	0	100%	0%
Hanging(s) with tobacco product advertisements visible in the area	1	75%	25%
Flier(s) with tobacco product advertisements visible in the area	0	100%	0%
Banner(s) with tobacco product advertisements visible in the area	0	100%	0%
Other types of tobacco product advertising visible in the area	0	100%	0%
Sports event sponsorship with tobacco product in the area	0	100%	0%
Entertainment event sponsorship with tobacco product in the area	0	100%	0%
Brand stretching (sharing tobacco product logo with other brands) taking place in the area	0	100%	0%
Any giveaways/gifts/samples of tobacco products taking place in the area	0	100%	0%
Promotional items associated with tobacco products taking place in the area	0	100%	0%
Any other promotional practices associated with tobacco products taking place in the area	0	100%	0%

## Multan:

### Smoking in public places:

Knowledge of the ban on smoking among staff in public places was relatively low in Multan compared to other districts, with 36% of staff not aware. People were found smoking in 55% of public places surveyed, with staff found smoking in 9%, cigarette butts visible in 59% and ashtrays visible in 14% of public places. Only 36% of public places in the district had 'no smoking boards' displayed.

Table 21: Compliance with TCLs in public places by TCL area - Multan

Area of TCL compliance in public places	Number of observations (N=22)	Percentage of public places in compliance with TCL	Percentage of public places in violation of TCL
Public places with 'No Smoking' boards visible	8	36%	74%
Public places where people were found smoking in the non-smoking area at the time of visit	12	45%	55%
Public places where staff was found smoking in non-smoking area at the time of visit	2	81%	9%
Places with cigarette butts visible in no-smoking area at the time of visit	13	41%	59%
Places with ashtrays or matches visible at the time of visit	3	86%	14%
Designated smoking area in the public place	0	100%	0%
Staff aware of ban on smoking in public places	14	64%	36%

A total of 3 public places in Multan (1 eatery, 1 hospital and 1 shopping mall), comprising 14% of total public places surveyed in the district, fulfilled the official criteria for a public place being declared smoke-free (no one observed smoking, no cigarette butts or ashtrays found, and 'no smoking' sign in place).

### Smoking in public service vehicles:

Knowledge of the smoking ban among PSV staff was also low in Multan compared to other districts, at 56%. 67% of PSVs had 'No Smoking' signs displayed, while drivers were found smoking in 33%, conductors in 11% and passengers in 22% of PSVs surveyed.

33% of PSVs in Multan were found to be fully smoke-free in compliance with TCLs (no smoking sign on display and no one found smoking in PSV at time of visit).

Table 22: Compliance with TCLs in PSVs by TCL area - Multan

Area of TCL compliance in PSVs	Number of (N=9)	Percentage of PSVs in compliance with TCL	Percentage of PSVs in violation of TCL
Driver found smoking in PSV at time of visit	3	67%	33%
Conductor found smoking in PSV at time of visit	1	89%	11%
Passenger found smoking in PSV at time of visit	2	78%	22%
"No-smoking" sign visible in PSV	6	67%	33%
PSV staff aware of ban on smoking in PSVs	5	56%	44%

#### Sales and TAPS restrictions at retail outlets:

The ban on sales to minors was found to be widely violated in Multan, with sales to minors taking place at 100% of outlets at the time of visit, and none of the vendors surveyed checking ID cards to verify the ages of customers. Further, only 40% of outlets had 'no sales to minors' sign on display.

Table 23: Compliance with TCLs at retail outlets by TCL area - Multan

Area of TCL compliance at retail outlets	Number (N=18)	Percentage of retail outlets in compliance with TCL	Percentage of retail outlets in Violation of TCL
Sales to minors taking place at time of visit	10	0%	100%
Vendors checking ID cards of cigarette buyers	0	0%	100%
'No sales to Persons under 18' sign on display	4	40%	60%
Cigarette packs without graphic health warnings are available for sale	5	50%	50%
Cigarette packs without excise stamps are available for sale	4	60%	40%
Loose cigarettes are available for sale	10	0%	100%
Cigarettes placed next to candies, snacks or children's products	8	20%	80%
Cigarettes advertised outside of store	4	60%	40%
Other tobacco products advertised outside the store	0	100%	0%
Cigarettes advertised inside of store	0	100%	0%
Special promotions or discounts offered for tobacco products	0	100%	0%
Any gifts/giveaways of tobacco products	0	100%	0%
Retail outlet located within 50m of an educational institution	0	100%	0%

### Advertising, promotion and sponsorship of cigarettes and tobacco products in marketplaces:

100% of marketplaces surveyed in Multan had point of sale (POS) advertisements displayed for tobacco products. All other TAPS restrictions for tobacco products were being complied with in the district.

Table 24: Compliance with ban on TAPS in marketplaces by TCL area - Multan

Area of TAPS restrictions	Number (N=9)	Percentage of marketplaces in compliance with TCL	Percentage of marketplaces in violation of TCL
Billboard(s) with tobacco product advertisements visible in the area	0	100%	0%
Point of sale tobacco product advertisement visible in the area	9	0%	100%
Neon sign (s) with tobacco product advertisement visible in area	0	100%	0%
Hanging(s) with tobacco product advertisements visible in the area	0	100%	0%
Flier(s) with tobacco product advertisements visible in the area	0	100%	0%
Banner(s) with tobacco product advertisements visible in the area	0	100%	0%
Other types of tobacco product advertising visible in the area	0	100%	0%
Sports event sponsorship with tobacco product in the area	0	100%	0%
Entertainment event sponsorship with tobacco product in the area	0	100%	0%
Brand stretching (sharing tobacco product logo with other brands) taking place in the area	0	100%	0%
Any giveaways/gifts/samples of tobacco products taking place in the area	0	100%	0%
Promotional items associated with tobacco products taking place in the area	0	100%	0%
Any other promotional practices associated with tobacco products taking place in the area	0	100%	0%

### Attock:

#### Smoking in public places:

While 86% of staff in public places surveyed in Attock were aware of the ban on smoking in public places, only 1% had 'no smoking' boards displayed, and people were found smoking in 64% and staff in 36% of public places surveyed in the district. Further, cigarette butts were found in the no-smoking area in 71% of public places surveyed.

Table 25: Compliance with TCLs in public places by TCL area - Attock

Area of TCL compliance in public places	Number of observations (N=14)	Percentage of public places in compliance with TCL	Percentage of public places in violation of TCL
Public places with 'No Smoking' boards visible	1	7%	93%
Public places where people were found smoking in the non-smoking area at the time of visit	9	36%	64%
Public places where staff was found smoking in non-smoking area at the time of visit	5	64%	36%
Places with cigarette butts visible in no-smoking area at the time of visit	10	29%	71%
Places with ashtrays or matches visible at the time of visit	0	100%	0%
Designated smoking area in the public place	0	100%	0%
Staff aware of ban on smoking in public places	12	86%	14%

No public place in Attock fulfilled the official criteria for being declared smoke-free (no one observed smoking, no cigarette butts or ashtrays found, and 'no smoking' sign in place).

#### Smoking in public service vehicles:

Almost all staff members (92%) of PSVs surveyed were aware of the ban on smoking in PSVs in Attock; however, drivers were found smoking in 50%, conductors in 17% and passengers in 33% of PSVs surveyed in the district. None of the PSVs surveyed had 'no smoking' signs displayed.

0% of PSVs in Attock were found to be fully smoke free in compliance with TCLs (no smoking sign on display and no one found smoking in PSV at time of visit).

Table 26: Compliance with TCLs in PSVs by TCL area - Attock

Area of TCL compliance in PSVs	Number of (N=12)	Percentage of PSVs in compliance with TCL	Percentage of PSVs in violation of TCL
Driver found smoking in PSV at time of visit	6	50%	50%
Conductor found smoking in PSV at time of visit	2	83%	17%
Passenger found smoking in PSV at time of visit	4	67%	33%
"No-smoking" sign visible in PSV	0	0%	100%
PSV staff aware of ban on smoking in PSVs	11	92%	8%



### Sales and TAPS restrictions at retail outlets:

While no sales to minors were taking place in any retail outlets in Attock at the time of visit, 0% of vendors were found to be checking ID cards of cigarette buyers to verify their age, and only 13% of retail outlets had a 'no sales to persons under 18' sign on display. Loose cigarettes were available for sale in 56%, cigarette packs without graphic health warnings were available in 13%, and cigarette packs without excise stamps were available in 13% of retail outlets surveyed in the district. No product advertisements, promotions or gifts/giveaways were found in any of the retail outlets in Attock. Around 56% of retail outlets were located within 50m of an educational institution.

Table 27: Compliance with TCLs at retail outlets by TCL area - Attock

Area of TC L compliance at retail outlets	Number (N=16)	Percentage of retail outlets in compliance with TCL	Percentage of retail outlets in Violation of TCL
Sales to minors taking place at time of visit	0	100%	0%
Vendors checking ID cards of cigarette buyers	0	0%	100%
'No sales to Persons under 18' sign on display	2	13%	87%
Cigarette packs without graphic health warnings are available for sale	2	87%	13%
Cigarette packs without excise stamps are available for sale	2	87%	13%
Loose cigarettes are available for sale	9	44%	56%
Cigarettes placed next to candies, snacks or children's products	8	50%	50%
Cigarettes advertised outside of store	0	100%	0%
Other tobacco products advertised outside the store	0	100%	0%
Cigarettes advertised inside of store	0	100%	0%
Special promotions or discounts offered for tobacco products	0	100%	0%
Any gifts/giveaways of tobacco products	0	100%	0%
Retail outlet located within 50m of an educational institution	9	44%	56%

### Advertising, promotion and sponsorship of cigarettes and tobacco products in marketplaces:

No violations of TAPS restrictions for cigarettes and tobacco products were found in any of the marketplaces surveyed in Attock.

Table 28: Compliance with ban on TAPS in marketplaces by TCL area - Attock

Area of TAPS restrictions	Number (N=9)	Percentage of marketplaces in compliance with TCL	Percentage of marketplaces in violation of TCL
Billboard(s) with tobacco product advertisements visible in the area	0	100%	0%
Point of sale tobacco product advertisement visible in the area	0	100%	0%
Neon sign (s) with tobacco product advertisement visible in area	0	100%	0%
Hanging(s) with tobacco product advertisements visible in the area	0	100%	0%
Flier(s) with tobacco product advertisements visible in the area	0	100%	0%
Banner(s) with tobacco product advertisements visible in the area	0	100%	0%
Other types of tobacco product advertising visible in the area	0	100%	0%
Sports event sponsorship with tobacco product in the area	0	100%	0%
Entertainment event sponsorship with tobacco product in the area	0	100%	0%
Brand stretching (sharing tobacco product logo with other brands) taking place in the area	0	100%	0%
Any giveaways/gifts/samples of tobacco products taking place in the area	0	100%	0%
Promotional items associated with tobacco products taking place in the area	0	100%	0%
Any other promotional practices associated with tobacco products taking place in the area	0	100%	0%

## Gujranwala:

### Smoking in public places:

93% of responsible staff in public places surveyed in Gujranwala were aware of the ban on smoking in public places, but violations were still common. Only 22% of public places in the district had 'no smoking' boards displayed, while people were found smoking in 44% and staff in 26% of public places surveyed. Cigarette butts were also visible in the no-smoking area of 41% of public places surveyed in the district.

Table 29: Compliance with TCLs in public places by TCL area - Gujranwala

Area of TCL compliance in public places	Number of observations (N=27)	Percentage of public places in compliance with TCL	Percentage of public places in violation of TCL
Public places with 'No Smoking' boards visible	6	22%	78%
Public places where people were found smoking in the non-smoking area at the time of visit	12	66%	44%
Public places where staff was found smoking in non-smoking area at the time of visit	7	74%	26%
Places with cigarette butts visible in no-smoking area at the time of visit	11	59%	41%
Places with ashtrays or matches visible at the time of visit	7	74%	26%
Designated smoking area in the public place	0	100%	0%
Staff aware of ban on smoking in public places	25	93%	7%

A total of 3 public places in Gujranwala (2 banks and 1 eatery), comprising 11% of total public places surveyed in the district, fulfilled the official criteria for a public place being declared smoke free (no one observed smoking, no cigarette butts or ashtrays found, and 'no smoking' sign in place).

#### Smoking in public service vehicles:

The knowledge of the smoking ban in PSVs was relatively low in Gujranwala, with only 57% of PSV staff aware of the ban. This is reflected in the high prevalence of smoking violations in PSVs in the district, with 71% of drivers, 43% of conductors and 57% of passengers in PSVs found smoking in the vehicle at the time of visit. No PSV in Gujranwala had a 'no smoking' sign displayed.

0% of PSVs in Gujranwala were found to be fully smoke-free in compliance with TCLs (no smoking sign on display and no one found smoking in PSV at time of visit).

Table 30: Compliance with TCLs in PSVs by TCL area - Gujranwala

Area of TCL compliance in PSVs	Number of (N=7)	Percentage of PSVs in compliance with TCL	Percentage of PSVs in violation of TCL
Driver found smoking in PSV at time of visit	5	29%	71%
Conductor found smoking in PSV at time of visit	3	57%	43%
Passenger found smoking in PSV at time of visit	4	43%	57%
"No-smoking" sign visible in PSV	0	0%	100%
PSV staff aware of ban on smoking in PSVs	4	57%	43%

### Sales and TAPS restrictions at retail outlets:

Sales to minors were found to be taking place at 53% of retail outlets surveyed in Gujranwala at the time of visit, while no vendors were found to be checking ID cards of cigarette buyers for age verification. Only 7% of retail outlets surveyed had a 'no sales to persons under 18' sign on display. Packaging restrictions were also being widely flouted, with cigarette packs without graphic health warnings available in 60% and cigarette packs without excise stamps available in 80% of retail outlets surveyed. Loose cigarettes were also widely available, in 93% of outlets surveyed while cigarettes were found placed next to candies, snacks or children's products in 80% of outlets surveyed. Advertising of cigarettes outside of the store (67% of outlets) and inside of the store (60% of outlets) was also widely observed, as well as advertising of other tobacco-based products in 73% of stores. Around 87% of retail outlets surveyed were within 50m of an educational institution.

Table 31: Compliance with TCLs at retail outlets by TCL area - Gujranwala

Area of TCL compliance at retail outlets	Number (N=15)	Percentage of retail outlets in compliance with TCL	Percentage of retail outlets in Violation of TCL
Sales to minors taking place at time of visit	8	47%	53%
Vendors checking ID cards of cigarette buyers	0	0%	100%
'No sales to Persons under 18' sign on display	1	7%	93%
Cigarette packs without graphic health warnings are available for sale	9	40%	60%
Cigarette packs without excise stamps are available for sale	12	20%	80%
Loose cigarettes are available for sale	14	7%	93%
Cigarettes placed next to candies, snacks or children's products	12	20%	80%
Cigarettes advertised outside of store	10	33%	67%
Other tobacco products advertised outside the store	11	27%	73%
Cigarettes advertised inside of store	9	40%	60%
Special promotions or discounts offered for tobacco products	0	100%	0%
Any gifts/giveaways of tobacco products	1	93%	7%
Retail outlet located within 50m of an educational institution	13	13%	87%

### Advertising, promotion and sponsorship of cigarettes and tobacco products in marketplaces:

Most TAPS restrictions on tobacco products were being complied with in marketplaces in Gujranwala, other than the presence of point-of-sale advertisements in one marketplace.

Table 32: Compliance with ban on TAPS in marketplaces by TCL area - Gujranwala

Area of TAPS restrictions	Number (N=2)	Percentage of marketplaces in compliance with TCL	Percentage of marketplaces in violation of TCL
Billboard(s) with tobacco product advertisements visible in the area	0	100%	0%
Point of sale tobacco product advertisement visible in the area	1	100%	50%
Neon sign (s) with tobacco product advertisement visible in area	0	100%	0%
Hanging(s) with tobacco product advertisements visible in the area	0	100%	0%
Flier(s) with tobacco product advertisements visible in the area	0	100%	0%
Banner(s) with tobacco product advertisements visible in the area	0	100%	0%
Other types of tobacco product advertising visible in the area	0	100%	0%
Sports event sponsorship with tobacco product in the area	0	100%	0%
Entertainment event sponsorship with tobacco product in the area	0	100%	0%
Brand stretching (sharing tobacco product logo with other brands) taking place in the area	0	100%	0%
Any giveaways/gifts/samples of tobacco products taking place in the area	0	100%	0%
Promotional items associated with tobacco products taking place in the area	0	100%	0%
Any other promotional practices associated with tobacco products taking place in the area	0	100%	0%

## Lodhran:

### Smoking in public places:

Knowledge of the ban on smoking in public places was relatively low among responsible staff members in public places surveyed in Lodhran, at 50%. This was reflected in the fact that people were found smoking in 92% and staff in 42% of public places surveyed, with only 25% of public places displaying a 'no smoking' board. Cigarette butts were visible in all public places surveyed in the district.

Table 33: Compliance with TCLs in public places by TCL area - Lodhran

Area of TCL compliance in public places	Number of observations (N=12)	Percentage of public places in compliance with TCL	Percentage of public places in violation of TCL
Public places with 'No Smoking' boards visible	3	25%	75%
Public places where people were found smoking in the non-smoking area at the time of visit	11	8%	92%
Public places where staff was found smoking in non-smoking area at the time of visit	5	58%	42%
Places with cigarette butts visible in no-smoking area at the time of visit	12	0%	100%
Places with ashtrays or matches visible at the time of visit	1	92%	8%
Designated smoking area in the public place	0	100%	0%
Staff aware of ban on smoking in public places	6	50%	50%

No public place in Lodhran fulfilled the official criteria for being declared smoke free (no one observed smoking, no cigarette butts or ashtrays found, and 'no smoking' sign in place).

#### Smoking in public service vehicles:

Knowledge of the ban on smoking in PSVs was also relatively low among PSV staff in Lodhran, with 55% of staff being aware. The prevalence of smoking in PSVs was high, with 64% of drivers, 36% of conductors and 55% of passengers found smoking at the time of visit in PSVs surveyed in Lodhran.

18% of PSVs in Lodhran were found to be fully smoke free in compliance with TCLs (no smoking sign on display and no one found smoking in PSV at time of visit).

Table 34: Compliance with TCLs in PSVs by TCL area - Lodhran

Area of TCL compliance in PSVs	Number of (N=11)	Percentage of PSVs in compliance with TCL	Percentage of PSVs in violation of TCL
Driver found smoking in PSV at time of visit	7	36%	64%
Conductor found smoking in PSV at time of visit	4	64%	36%
Passenger found smoking in PSV at time of visit	6	45%	55%
"No-smoking" sign visible in PSV	2	18%	92%
PSV staff aware of ban on smoking in PSVs	6	55%	45%

### Sales and TAPS restrictions at retail outlets:

Sales to minors appeared to be widespread in Lodhran, with such sales taking place at the time of visit in 67% of retail outlets surveyed in the district and only 17% of vendors checking ID cards to verify ages of cigarette buyers. Only 42% of outlets displayed a 'no sales to persons under 18' sign. Availability of cigarettes without graphic health warnings or excise stamps was relatively low, at 4% each. Loose cigarettes were available for sale at all retail outlets surveyed, and cigarettes were placed next to candies, snacks or children's products at all retail outlets surveyed. 67% of retail outlets also had cigarettes advertised outside the store. Only 4% of retail outlets surveyed were located in the vicinity of an educational institution.

Table 35: Compliance with TCLs at retail outlets by TCL area - Lodhran

Area of TC L compliance at retail outlets	Number (N=24)	Percentage of retail outlets in compliance with TCL	Percentage of retail outlets in Violation of TCL
Sales to minors taking place at time of visit	16	33%	67%
Vendors checking ID cards of cigarette buyers	4	17%	83%
'No sales to Persons under 18' sign on display	10	42%	58%
Cigarette packs without graphic health warnings are available for sale	1	96%	4%
Cigarette packs without excise stamps are available for sale	1	96%	4%
Loose cigarettes are available for sale	24	0%	100%
Cigarettes placed next to candies, snacks or children's products	24	0%	100%
Cigarettes advertised outside of store	16	33%	67%
Other tobacco products advertised outside the store	0	100%	0%
Cigarettes advertised inside of store	0	100%	0%
Special promotions or discounts offered for tobacco products	1	96%	4%
Any gifts/giveaways of tobacco products	0	100%	0%
Retail outlet located within 50m of an educational institution	1	96%	4%

### Advertising, promotion and sponsorship of cigarettes and tobacco products in marketplaces:

Most TAPS restrictions on tobacco products were being complied with in Lodhran, with the exception of Point of Sale (POS) advertisements, which were found in all marketplaces surveyed in the district.

Table 36: Compliance with ban on TAPS in marketplaces by TCL area - Lodhran

Area of TAPS restrictions	Number (N=3)	Percentage of marketplaces in compliance with TCL	Percentage of marketplaces in violation of TCL
Billboard(s) with tobacco product advertisements visible in the area	0	100%	0%
Point of sale tobacco product advertisement visible in the area	3	0%	
Neon sign (s) with tobacco product advertisement visible in area	0	100%	0%
Hanging(s) with tobacco product advertisements visible in the area	0	100%	0%
Flier(s) with tobacco product advertisements visible in the area	0	100%	0%
Banner(s) with tobacco product advertisements visible in the area	0	100%	0%
Other types of tobacco product advertising visible in the area	0	100%	0%
Sports event sponsorship with tobacco product in the area	0	100%	0%
Entertainment event sponsorship with tobacco product in the area	0	100%	0%
Brand stretching (sharing tobacco product logo with other brands) taking place in the area	0	100%	0%
Any giveaways/gifts/samples of tobacco products taking place in the area	0	100%	0%
Promotional items associated with tobacco products taking place in the area	0	100%	0%
Any other promotional practices associated with tobacco products taking place in the area	0	100%	0%

## Hyderabad:

### Smoking in public places

Staff at 91% of public places in Hyderabad were aware of the ban on smoking in public places. Compliance with the smoking ban in public places was relatively higher at public places compared to other districts, with people found smoking in only 13% of public places visited and no staff found smoking in any public place. Cigarette butts were visible in 22% of public places surveyed.



Table 37: Compliance with TCLs in public places by TCL area - Hyderabad

Area of TCL compliance in public places	Number of observations (N=23)	Percentage of public places in compliance with TCL	Percentage of public places in violation of TCL
Public places with 'No Smoking' boards visible	8	35%	65%
Public places where people were found smoking in the non-smoking area at the time of visit	3	87%	13%
Public places where staff was found smoking in non-smoking area at the time of visit	0	100%	0%
Places with cigarette butts visible in no-smoking area at the time of visit	5	78%	22%
Places with ashtrays or matches visible at the time of visit	0	100%	0%
Designated smoking area in the public place	0	100%	0%
Staff aware of ban on smoking in public places	21	91%	9%

A total of 4 public places in Hyderabad (2 banks, 1 educational institution and 1 government office), comprising 17% of total public places surveyed in the district, fulfilled the official criteria for a public place being declared smoke-free (no one observed smoking, no cigarette butts or ashtrays found, and 'no smoking' sign in place).

#### Smoking in public service vehicles:

Knowledge of the ban on smoking in PSVs was low among PSV staff in Hyderabad with only 45% of those surveyed aware of the ban and no 'no smoking' signs displayed in any PSV surveyed. Drivers were found smoking in 27%, conductors in 9% and passengers in 18% of PSVs surveyed.

0% of PSVs in Hyderabad were found to be fully smoke-free in compliance with TCLs (no smoking sign on display and no one found smoking in PSV at time of visit).

Table 38: Compliance with TCLs in PSVs by TCL area - Hyderabad

Area of TCL compliance in PSVs	Number of (N=11)	Percentage of PSVs in compliance with TCL	Percentage of PSVs in violation of TCL
Driver found smoking in PSV at time of visit	3	73%	27%
Conductor found smoking in PSV at time of visit	1	91%	9%
Passenger found smoking in PSV at time of visit	2	82%	18%
"No-smoking" sign visible in PSV	0	0%	100%
PSV staff aware of ban on smoking in PSVs	5	45%	55%

### Sales and TAPS restrictions at retail outlets:

While 85% of retail outlets did not have sales to minors taking place at the time of visit, no vendors in any retail outlets in Hyderabad were checking ID cards of cigarette buyers for age verification, and only 8% of outlets had 'no sales to persons under 18' signs on display. 15% of outlets had cigarette packs without graphic warnings available for sale, while 8% had cigarette packs without excise stamps available for sale. Loose cigarettes were available for sale in 38% of outlets surveyed, while cigarettes were placed next to candies, snacks or children's products in 38% of outlets. Advertising for cigarettes was observed outside the store at 38% of outlets, inside the store 15% of outlets and advertising for other tobacco products was found at 38% of outlets. Around 15% of retail outlets were located within 50m of an educational institution.

Table 39 Compliance with TCLs at retail outlets by TCL area - Hyderabad

Area of TC L compliance at retail outlets	Number (N=13)	Percentage of retail outlets	Percentage of retail outlets in compliance with TCL	Percentage of retail outlets in Violation of TCL
Sales to minors taking place at time of visit	2	15%	85%	15%
Vendors checking ID cards of cigarette buyers	0	0%	0%	100%
'No sales to Persons under 18' sign on display	1	8%	8%	92%
Cigarette packs without graphic health warnings are available for sale	2	15%	85%	15%
Cigarette packs without excise stamps are available for sale	1	8%	92%	8%
Loose cigarettes are available for sale	5	38%	62%	38%
Cigarettes placed next to candies, snacks or children's products	5	38%	62%	38%
Cigarettes advertised outside of store	5	38%	62%	38%
Other tobacco products advertised outside the store	3	23%	77%	23%
Cigarettes advertised inside of store	2	15%	85%	15%
Special promotions or discounts offered for tobacco products	0	0%	100%	0%
Any gifts/giveaways of tobacco products	0	0%	100%	0%
Retail outlet located within 50m of an educational institution	2	15%	85%	15%

### Advertising, promotion and sponsorship of cigarettes and tobacco products in marketplaces:

No violation of TAPS restrictions on cigarettes and tobacco products was found in any of the marketplaces surveyed in Hyderabad.

Table 40: Compliance with ban on TAPS in marketplaces by TCL area - Hyderabad

Area of TAPS restrictions	Number (N=5)	Percentage of marketplaces in compliance with TCL	Percentage of marketplaces in violation of TCL
Billboard(s) with tobacco product advertisements visible in the area	0	100%	0%
Point of sale tobacco product advertisement visible in the area	0	100%	0%
Neon sign (s) with tobacco product advertisement visible in area	0	100%	0%
Hanging(s) with tobacco product advertisements visible in the area	0	100%	0%
Flier(s) with tobacco product advertisements visible in the area	0	100%	0%
Banner(s) with tobacco product advertisements visible in the area	0	100%	0%
Other types of tobacco product advertising visible in the area	0	100%	0%
Sports event sponsorship with tobacco product in the area	0	100%	0%
Entertainment event sponsorship with tobacco product in the area	0	100%	0%
Brand stretching (sharing tobacco product logo with other brands) taking place in the area	0	100%	0%
Any giveaways/gifts/samples of tobacco products taking place in the area	0	100%	0%
Promotional items associated with tobacco products taking place in the area	0	100%	0%
Any other promotional practices associated with tobacco products taking place in the area	0	100%	0%

## Karachi:

### Smoking in public places

77% of responsible staff in public places in Karachi were aware of the ban on smoking in public places, but only 31% of public places in the district had 'no smoking' boards displayed. People were found smoking in a majority (58%) of public places surveyed whereas staff members were found smoking in 27% of public places surveyed at the time of visit. Cigarette butts were found in the non-smoking area in 50% of public places surveyed in Karachi.

Table 41: Compliance with TCLs in public places by TCL area - Karachi

Area of TCL compliance in public places	Number of observations (N=26)	Percentage of public places in compliance with TCL	Percentage of public places in violation of TCL
Public places with 'No Smoking' boards visible	8	31%	69%
Public places where people were found smoking in the non-smoking area at the time of visit	15	42%	58%
Public places where staff was found smoking in non-smoking area at the time of visit	7	73%	27%
Places with cigarette butts visible in no-smoking area at the time of visit	13	50%	50%
Places with ashtrays or matches visible at the time of visit	0	100%	0%
Designated smoking area in the public place	0	100%	0%
Staff aware of ban on smoking in public places	20	77%	23%

A total of 3 public places in Karachi (2 bank, 1 educational institution and 1 hospital), comprising 11% of total public places surveyed in the district, fulfilled the official criteria for a public place being declared smoke-free (no one observed smoking, no cigarette butts or ashtrays found, and 'no smoking' sign in place).

#### Smoking in public service vehicles:

Awareness of ban on smoking in PSVs surveyed in Karachi was low, with only 43% of staff aware of the ban. Only 29% of PSVs surveyed had 'no smoking' signs displayed and drivers were found smoking in 57%, conductors in 29% and passengers in 43% of PSVs surveyed at the time of visit.

14% of PSVs in Karachi were found to be fully smoke free in compliance with TCLs (no smoking sign on display and no one found smoking in PSV at time of visit).

Table 42: Compliance with TCLs in PSVs by TCL area - Karachi

Area of TCL compliance in PSVs	Number of (N=7)	Percentage of PSVs in compliance with TCL	Percentage of PSVs in violation of TCL
Driver found smoking in PSV at time of visit	4	43%	57%
Conductor found smoking in PSV at time of visit	2	71%	29%
Passenger found smoking in PSV at time of visit	3	57%	43%
"No-smoking" sign visible in PSV	2	29%	71%
PSV staff aware of ban on smoking in PSVs	3	43%	57%

### Sales and TAPS restrictions at retail outlets:

Sales to minors were taking place in 31% of retail outlets surveyed in Karachi at the time of visit, and 0% of vendors were checking ID cards of cigarette buyers to verify their age. Compliance was observed for TCLs related to packaging, with no cigarette packs without graphic warnings or excise stamps available for sale in any of the outlets surveyed. Loose cigarettes were available in 46% of outlets surveyed, and 38% had cigarettes placed next to candies, snacks or children's products. 38% of retail outlets surveyed in Karachi had cigarettes advertised outside the store while 23% had cigarette advertisements inside the store. No retail outlets surveyed were located within 50m of an educational institution.

Table 43: Compliance with TCLs at retail outlets by TCL area - Karachi

Area of TC L compliance at retail outlets	Number (N=13)	Percentage of retail outlets in compliance with TCL	Percentage of retail outlets in Violation of TCL
Sales to minors taking place at time of visit	4	69%	31%
Vendors checking ID cards of cigarette buyers	0	0%	100%
'No sales to Persons under 18' sign on display	0	0%	100%
Cigarette packs without graphic health warnings are available for sale	0	100%	0%
Cigarette packs without excise stamps are available for sale	0	100%	0%
Loose cigarettes are available for sale	6	54%	46%
Cigarettes placed next to candies, snacks or children's products	5	62%	38%
Cigarettes advertised outside of store	5	62%	38%
Other tobacco products advertised outside the store	2	85%	15%
Cigarettes advertised inside of store	3	77%	23%
Special promotions or discounts offered for tobacco products	0	100%	0%
Any gifts/giveaways of tobacco products	0	100%	0%
Retail outlet located within 50m of an educational institution	0	100%	0%

### Advertising, promotion and sponsorship of cigarettes and tobacco products in marketplaces:

No violation of TAPS restrictions on cigarettes and tobacco products was found in any of the marketplaces surveyed in Karachi.

Table 44: Compliance with ban on TAPS in marketplaces by TCL area - Karachi

Area of TAPS restrictions	Number (N=7)	Percentage of marketplaces in compliance with TCL	Percentage of marketplaces in violation of TCL
Billboard(s) with tobacco product advertisements visible in the area	0	100%	0%
Point of sale tobacco product advertisement visible in the area	0	100%	0%
Neon sign (s) with tobacco product advertisement visible in area	0	100%	0%
Hanging(s) with tobacco product advertisements visible in the area	0	100%	0%
Flier(s) with tobacco product advertisements visible in the area	0	100%	0%
Banner(s) with tobacco product advertisements visible in the area	0	100%	0%
Other types of tobacco product advertising visible in the area	0	100%	0%
Sports event sponsorship with tobacco product in the area	0	100%	0%
Entertainment event sponsorship with tobacco product in the area	0	100%	0%
Brand stretching (sharing tobacco product logo with other brands) taking place in the area	0	100%	0%
Any giveaways/gifts/samples of tobacco products taking place in the area	0	100%	0%
Promotional items associated with tobacco products taking place in the area	0	100%	0%
Any other promotional practices associated with tobacco products taking place in the area	0	100%	0%

## Islamabad:

### Smoking in public places:

There was relatively higher compliance for the ban on smoking in public places in Islamabad compared to other districts, but violations were observed, nonetheless. 90% of staff in public places surveyed in Islamabad were aware of the ban on smoking in public places yet only 30% had 'no smoking' boards displayed. People were found smoking at 20% of public places surveyed in Islamabad, though no staff member was found smoking in any place surveyed in the district. Cigarettes and ashtrays were observed in 10% each of public places surveyed.

Table 45: Compliance with TCLs in public places by TCL area - Islamabad

Area of TCL compliance in public places	Number of observations (N=20)	Percentage of public places in compliance with TCL	Percentage of public places in violation of TCL
Public places with 'No Smoking' boards visible	6	30%	70%
Public places where people were found smoking in the non-smoking area at the time of visit	4	80%	20%
Public places where staff was found smoking in non-smoking area at the time of visit	0	100%	0%
Places with cigarette butts visible in no-smoking area at the time of visit	2	90%	10%
Places with ashtrays or matches visible at the time of visit	2	90%	10%
Designated smoking area in the public place	2	90%	10%
Staff aware of ban on smoking in public places	18	90%	10%

A total of 3 public places in Islamabad (1 eatery, 1 hospital and 1 shopping mall), comprising 15% of total public places surveyed in the district, fulfilled the official criteria for a public place being declared smoke-free (no one observed smoking, no cigarette butts or ashtrays found, and 'no smoking' sign in place).

#### Smoking in public service vehicles:

Compliance with the ban on smoking in PSVs was relatively high in Islamabad compared to other districts, with all PSV staff surveyed being aware of the ban, and no drivers, conductors or passengers found smoking in any PSV surveyed in the district. 88% of PSVs surveyed had 'no smoking' signs displayed.

88% of PSVs in Islamabad were found to be fully smoke-free in compliance with TCLs (no smoking sign on display and no one found smoking in PSV at time of visit).

Table 46: Compliance with TCLs in PSVs by TCL area - Islamabad

Area of TCL compliance in PSVs	Number of (N=8)	Percentage of PSVs in compliance with TCL	Percentage of PSVs in violation of TCL
Driver found smoking in PSV at time of visit	0	100%	0%
Conductor found smoking in PSV at time of visit	0	100%	0%
Passenger found smoking in PSV at time of visit	0	100%	0%
"No-smoking" sign visible in PSV	7	88%	12%
PSV staff aware of ban on smoking in PSVs	8	100%	0%

### Sales and TAPS restrictions at retail outlets:

A small percentage (11%) of retail outlets surveyed in Islamabad had sales to minors taking place at the time of visit, but 0% of vendors were checking ID cards of cigarette buyers for age verification, and only 6% of vendors displayed a 'no sales to persons under 18' sign. Compliance with packaging restrictions appeared to be high in the district, with no cigarette packs without graphic health warnings or excise stamps found available for sale in any retail outlet surveyed. Loose cigarettes were available for sale in 28%, while cigarettes were placed next to candies, snacks or children's products in 28% of retail outlets surveyed. No advertisements for cigarettes or other tobacco products were found in retail outlets surveyed in Islamabad. Around 22% of retail outlets selling tobacco products were located within 50m of an educational institution.

Table 47: Compliance with TCLs at retail outlets by TCL area - Islamabad

Area of TC L compliance at retail outlets	Number (N=18)	Percentage of retail outlets in compliance with TCL	Percentage of retail outlets in Violation of TCL
Sales to minors taking place at time of visit	2	89%	11%
Vendors checking ID cards of cigarette buyers	0	0%	100%
'No sales to Persons under 18' sign on display	1	94%	6%
Cigarette packs without graphic health warnings are available for sale	0	100%	0%
Cigarette packs without excise stamps are available for sale	0	100%	0%
Loose cigarettes are available for sale	5	72%	28%
Cigarettes placed next to candies, snacks or children's products	5	72%	28%
Cigarettes advertised outside of store	0	100%	0%
Other tobacco products advertised outside the store	0	100%	0%
Cigarettes advertised inside of store	0	100%	0%
Special promotions or discounts offered for tobacco products	0	100%	0%
Any gifts/giveaways of tobacco products	0	100%	0%
Retail outlet located within 50m of an educational institution	4	78%	22%



### Advertising, promotion and sponsorship of cigarettes and tobacco products in marketplaces:

No violation of TAPS restrictions on cigarettes and tobacco products was found in any of the marketplaces surveyed in Islamabad.

Table 48: Compliance with ban on TAPS in marketplaces by TCL area - Islamabad

Area of TAPS restrictions	Number (N=13)	Percentage of marketplaces in compliance with TCL	Percentage of marketplaces in violation of TCL
Billboard(s) with tobacco product advertisements visible in the area	0	100%	0%
Point of sale tobacco product advertisement visible in the area	0	100%	0%
Neon sign (s) with tobacco product advertisement visible in area	0	100%	0%
Hanging(s) with tobacco product advertisements visible in the area	0	100%	0%
Flier(s) with tobacco product advertisements visible in the area	0	100%	0%
Banner(s) with tobacco product advertisements visible in the area	0	100%	0%
Other types of tobacco product advertising visible in the area	0	100%	0%
Sports event sponsorship with tobacco product in the area	0	100%	0%
Entertainment event sponsorship with tobacco product in the area	0	100%	0%
Brand stretching (sharing tobacco product logo with other brands) taking place in the area	0	100%	0%
Any giveaways/gifts/samples of tobacco products taking place in the area	0	100%	0%
Promotional items associated with tobacco products taking place in the area	0	100%	0%
Any other promotional practices associated with tobacco products taking place in the area	0	100%	0%

## vi. Summary of Findings:

1. The compliance of TCLs on smoking in public places and public service vehicles is severely low across the ten districts surveyed.
2. There are minimal barriers for minors to access tobacco products at retail level despite legislation on restricted sales to minors. Age-checks are not enforced entirely at point of sales.
3. Ban on TAPS is one area of tobacco control laws that is being enforced compared to others, with some exceptions.
4. Only 12% of public places surveyed in the ten districts across the country can be designated as smoke-free public places based on TSFC criteria.
5. Only 26% of public places surveyed across the country have 'No Smoking' boards displayed.
6. People were found smoking in the non-smoking area in nearly half (45%) of all public venues surveyed.
7. Court premises were found to be least compliant to smoking ban at public places, followed by accommodation/hotels, entertainment venues, bus/train stations, shopping malls and sports stadiums.
8. Only 17% of public service vehicles surveyed across the country were found to be fully compliant with the ban on smoking in PSVs.
9. Drivers of PSVs were found smoking in 44% of PSVs surveyed across the country.
10. Only 22% of PSVs surveyed had 'No Smoking' signs displayed.
11. Vans/hiaces, local buses and other forms of local transport (like Chingqi's and Suzukis) are the worst offenders for public smoking in PSVs.
12. Sales to minors were found taking place in 36% of retail outlets surveyed.
13. Loose cigarettes were being sold in 67% of retail outlets surveyed.
14. Cigarette packs without graphic health warnings were being sold in 20% and cigarette packs without excise stamps were being sold in 24% of retail outlets across the districts surveyed.
15. 42% of retail outlets selling tobacco products were located within 50m of an educational institution.
16. 23% of marketplaces across the districts surveyed had (POS) advertisements for tobacco products on display.

## vii. Recommendations:

1. District level tobacco control cells/committees for TCL implementation need to be operationalized in all districts, with participation from national and provincial TCC, Departments of Health, district administration and police, TSFC initiative members, civil society members, members of the judiciary, and other relevant stakeholders.
2. District TCL enforcement task forces need to be established with adequate budgetary and human resources allocated from the provincial (and in case of Islamabad, federal) level.
3. District-level action plans need to be formulated for phased implementation of TCLs based on local contexts.
4. Regular monitoring exercises need to be conducted at the district level at public places, PSVs, retail outlets and marketplaces to collect data on status of TCL implementation in public places, PSVs, retail outlets and marketplaces, and compile reports for district tobacco control cells/committees.
5. Fines and penalties already outlined in TCLs need to be effectively imposed on offenders.
6. Particular emphasis must be paid to implementing ID checks by retailers for age verification for buyers of cigarettes and other tobacco products.
7. District TCCs and task forces can provide necessary support to businesses and organizations to implement smoking ban through signage, educational material and technical assistance.
8. Smoke-free certifications issued by local authorities for businesses and organizations can be used to incentivize TCL implementation.
9. An effective enforcement and awareness campaign needs to be launched against smoking in PSVs, with particular emphasis on local forms of transport like vans, local buses and other smaller forms of local public transport.
10. The February 2023 hike in taxes on cigarettes should be sustained in line with inflation, with complementary policy measures to mitigate increased use of Naswar, nicotine pouches and other tobacco and nicotine-based products.



# **TOBACCO CONTROL LAWS IMPLEMENTATION IN PAKISTAN : A GAP ANALYSIS**

*Heartfile*

 Vital  
Strategies

# Tobacco Control Laws Implementation in Pakistan - A Gap Analysis

## 1. Introduction:

Over the past two decades, Pakistan has enacted a number of (TCLs) at the federal and provincial levels to meet Pakistan's FCTC commitments with respect to tobacco control. Beginning with the Prohibition of Smoking and Protection of Non - Smokers Ordinance in 2002, which initially banned smoking in public places, placed advertising restrictions and sales restrictions for tobacco products and established penalties for violators. Later, new tobacco control legislation introduced graphic health warnings for cigarettes, enhanced restrictions on tobacco advertising, promotion and sponsorships, ban on sales of loose cigarettes, expanded definition of public places prohibiting smoking, ban on marketing of tobacco products targeted at minors and youth, among other provisions.

In the second half of 2023, Heartfile carried out a monitoring of existing TCLs in 10 districts across 3 provinces in Pakistan in support of the government's Tobacco Smoke Free cities (TSFC) Initiative. The purpose of this monitoring exercise was to gather evidence on the implementation of (TCLs) related to smoke - free places, smoke - free public service vehicles, point of sale restrictions, ban on sales to minors, graphic health warnings, tobacco advertising, promotions, and sponsorships in 10 districts across Pakistan, including Abbottabad, Peshawar, Rawalpindi, Multan, Attock, Gujranwala, Lodhran, Hyderabad, Karachi, and Islamabad.

The key pieces of TC legislation this survey attempted to assess compliance with included: all sections of the Prohibition of Smoking and Protection of Nonsmokers Health Ordinance 2002, SRO 1086 (I)/2013 on ban on tobacco product advertisements in print, electronic and outdoor media, SRO No.86, 87 (KE)/2009 on Printing of pictorial health warning on Cigarette packs, SRO 415(I)/2018 on Ban on Sale of Cigarettes in Loose Form (open cigarette sticks) and SRO 72(I)/2020 on Ban on Tobacco Advertisement, Promotion and Sponsorship TAPS and POS advertising.

This document distils the key lessons from the study from across the country, outlines key areas of concern and progress, and lists key administrative and policy interventions needed to address TCL enforcement gaps.

## 2. Methodology:

We conducted a cross-sectional survey between September to November 2023, among public places, public service vehicles, retail outlets and marketplaces (with 50 sites covered per district). The sample for the study included 196 public places, 90 public service vehicles, 152 retail outlets and 78 marketplaces across the 10 districts. Districts were selected in consultation with TSFC and TCC partners based on key

districts for which TCL monitoring exercises had not yet been conducted. For each district, the ideal sample distribution aimed at was 13 public places, 13 public service vehicles, 12 retail outlets and 12 marketplaces. Since different public places operate at different times of the day, and smoking habits of people vary depending on the time of the day, time location sampling was utilized to identify the appropriate time of observation for a particular site.

Data collection consisted of two parts: i) observation of public places, PSVs, retail outlets and marketplaces for examining direct and indirect evidence of smoking, compliance with signage restrictions and compliance with sales, packaging and advertising regulations, and ii) short interviews with responsible staff in public places, public service vehicles and retail outlets regarding awareness of and compliance with TCLs. Data were collected by surveyors using a monitoring tool adapted from guides developed by the government's Tobacco Smoke Free Cities project as well as guides developed by the Campaign for Tobacco-Free Kids, and International Union against Tuberculosis and Lung Disease. All data were entered on a protected excel worksheet. Descriptive statistics like frequencies for qualitative variables and proportions for quantitative variables were drawn from the observations and interviews done. The data was analyzed with respect to compliance of the aforementioned tobacco control laws.

### 3. Gaps in protection from exposure to smoke:

#### i. Smoking at public places:

Violations of the ban on smoking in public places are widespread across the country. The data tells us that in general, awareness of the ban on public smoking among responsible staff is not a concern – the problem lies with widespread lack of implementation, in which staff are often themselves complicit. People were found smoking in nearly half (45%) of all public places surveyed, with staff found smoking in 21%, and other evidence of smoking (such as cigarette butts) also widespread. Most public places surveyed (about 74%) were not displaying signage to inform the public about the ban on smoking in public places and a large percentage (45%) had cigarette butts visible in the no-smoking area.

Table 1: Compliance of public places with TCLs by area

Area of TCL for public places	Number (N =196)	Percentage	Percentage of public places in compliance with TCL
<b>Public places with 'No Smoking' boards displayed</b>	51	26%	26%
Public places where people were found smoking in the non-smoking area at the time of visit	89	45%	55%
Public places where staff was found smoking in non-smoking area at the time of visit	41	21%	79%
Places with cigarette butts visible in no-smoking area at the time of visit	89	45%	55%

Places with ashtrays or matches visible at the time of visit	22	11%	89%
Designated smoking area in the public place	2	1%	99%
Staff aware of ban on smoking in public places	167	85%	85%

Some public places with particularly low compliance with the public smoking ban include court premises, hotels, private offices, entertainment venues, shopping malls, bus/train stations, eateries and government offices. Only 12% of public places surveyed in the sample from across districts could be characterized as smoke-free.

Table 2: Smoke-free public places by category

Public place category	Number of smoke-free places	Smoke-free places as percentage of total places surveyed
Accommodation/hotel	0	0%
Bank	8	53%
Bus/train station	2	7%
Court premises	0	0%
Eatery (Restaurant/Dhaba/Café)	3	9%
Educational institution	3	13%
Entertainment venue	0	0%
Government office	1	6%
Hospital	3	13%
Private office	0	0%
Shopping Mall	2	17%
Sports venue/stadium	1	25%
<b>Total smoke-free places</b>	<b>23</b>	<b>12%</b>

Authorized staff at public places are responsible for ensuring compliance with the ban on smoking in public places and they appear to be widely unaware of and/or failing in their responsibilities. As per TCLs, authorized staff includes officers of Grade 20 and above for their respective government departments, heads of educational institutions, managers of railway stations, airports, and bus stations, airline staff for airplanes, restaurant/eatery managers, hospital administrators, and managers of private offices/entertainment venues, for each of their public places respectively. Authorized staff are empowered under law to eject those violating the public smoking ban from the public place and submit a written request to the magistrate or local police station for legal action.



## ii. Smoking violations on public transport.

Smoking on public transport presents one of the clearest challenges to implementing the public smoking ban. Drivers were found smoking in 44%, conductors in 26% and passengers in 33% of public service vehicles (PSVs) surveyed at the time of visit. Less than a quarter of PSVs had 'no smoking' signage displayed in their vehicles. Overall, less than a fifth of PSVs surveyed (17%) were found to be smoke-free. The only exceptions to this trend were metrobuses, all of which were found to be smoke-free. The widespread nature of TC violations in PSVs indicates that the entire culture of public transport (particularly on private transport vehicles like local vans/*hiaces* and local buses) needs to be transformed. Authorized staff responsible for compliance with the public smoking ban for public transport vehicles include drivers, conductors, and guards where applicable.

Table 3: Compliance of PSVs with TCLs by area

Area of TCL for PSVs	Number (N=90)	Percentage of PSVs
Driver found smoking in PSV at time of visit	40	44%
Conductor found smoking in PSV at time of visit	23	26%
Passenger found smoking in PSV at time of visit	30	33%
"No smoking" sign visible in PSV	20	22%
PSV staff aware of ban on smoking in PSVs	64	71%

According to Pakistan's tobacco control laws, smoking in public places or public transport, or failing to put up 'no smoking' signs in public spaces as the responsible staff for the public place attracts a fine of PKR 1000 for the first offence, and a fine of up to PKR 100,000 for subsequent offences. However, such fines are rarely imposed in most public places or public transport. Human and financial resources need to be committed to and by local authorities for the purpose of monitoring public places and public transport for compliance with TCLs. There must be greater sensitization among authorized staff on their roles in implementing the public smoking ban under their domains and those authorized staff members who fail to act against violations of smoking in PSVs.

## 4. Violation of retail restrictions on cigarette sales:

### i. Access of minors to cigarettes:

One of the most troubling areas of tobacco control law enforcement in Pakistan is sales of tobacco products to minors, which appear to be widely taking place in the absence of identification checks or age verification by vendors. 36% of retail outlets surveyed were found to be engaging in sales to minors at the time of visit (which safely implies the actual percentage of vendors selling cigarettes to minors is far higher), whereas only 3% of vendors at retail outlets were found to be checking ID cards for purchases of tobacco products at the time of visit. Less than a fifth (18%) of retail outlets had 'No sales to persons under 18' signs on display, suggesting a widespread lack of effort by vendors to adhere to the law underage sales. Access of minors to tobacco products is also being facilitated by product placement; 67% of retail outlets displayed cigarettes next to or near candies, snacks or other products attractive to children.

There is also a lingering concern about tobacco products continuing to be widely available in the vicinity of educational institutions, with 42% of retail outlets selling tobacco located within 50 meters of schools and colleges. According to Pakistan's existing TC laws, those selling tobacco products to those under 18 years of age or selling tobacco products within 50 meters of an educational institution should be charged a fine of PKR 5000 for the first offence and up to PKR 100,000 or 3 months imprisonment or both for subsequent offences.

## ii. Other sales restrictions violations:

Beyond underage sales, violations of other restrictions on cigarette sales also appear to be common in some areas. These include a significant percentage of retail outlets (20%) that were selling cigarette packs without graphic health warnings as required by law, and a large 24% that were selling cigarettes without excise stamps mandated by FBR, which suggests continued practice of forestalling measures by the tobacco industry to avoid the impact of tax increases. The sale of loose cigarettes was also taking place in over two thirds (67%) of retail outlets selling tobacco products, which is prohibited by law and plays a major factor in maintaining the affordability of cigarettes despite tax increases.

Table 4: Compliance with TCLs at retail outlets by TCL area

Area of TCL for retail outlets	Number of retail outlets (N=152)	Percentage of retail outlets
Sales to minors taking place at time of visit	55	36%
Vendors checking ID cards of cigarette buyers	4	3%
'No sales to Persons under 18' sign on display	28	18%
Cigarette packs without graphic health warnings are available for sale	31	20%
Cigarette packs without excise stamps are available for sale	36	24%
Loose cigarettes are available for sale	102	67%
Cigarettes placed next to candies, snacks or children's products	96	63%
Cigarettes advertised outside of store	47	31%
Other tobacco products advertised outside the store	29	19%
Cigarettes advertised inside store	26	17%
Special promotions or discounts offered for tobacco products	0	0%
Any gifts/giveaways of tobacco products	0	0%
Retail outlet located within 50m of an educational institution	64	42%

A concerted enforcement effort is needed to enforce sales restrictions on cigarettes and tobacco products, in particular to prevent widespread access to tobacco products for minors. As per existing law, local authorities must redouble efforts to enforce Section 8 of Prohibition of Smoking and Protection of

Nonsmokers Health Ordinance 2002 on prohibition of sale of cigarettes, etc., to minors and Section 9 on the prohibition of storage, sale and distribution of cigarettes, etc., in the immediate vicinity of educational institutions. This must involve the imposition of penalties on violators and engagement with traders for the adoption of zero tolerance policies towards underage sales of tobacco products.

Beyond existing legislation, there is a major gap in Pakistan's tobacco control framework in terms of absence of licensing for sale of tobacco products. To align with FCTC Article 15 and improve enforcement of retail restrictions, there needs to be legislation to require retailers to meet conditions regarding restrictions on underage sales, stocking of non-stamped cigarette packs and packs without graphic health warnings, sale of loose cigarettes and, as apparent in the next section, Point-of-Sale advertising. Following the establishment of a tobacco trade licensing framework, clear rules need to be framed that establish regular monitoring conditions for licensing and procedures and penalties in case of violation.

## 5. Progress and remaining gaps in TAPS restrictions:

The area of tobacco control law that has witnessed relatively greater implementation across districts is that of ban on Tobacco Advertising, Promotion and Sponsorship in public places and marketplaces. In all marketplaces surveyed, no billboards, neon signs, fliers, banners or other types of tobacco product advertisements were found in any of the marketplaces surveyed, whereas only one marketplace surveyed in the country had a hanging displayed for a tobacco product. No sponsorships by tobacco companies were found taking place whereas in two marketplaces, giveaways of tobacco products were being advertised as part of a Lucky Draw. With some exceptions, the ban on public advertising of cigarettes appears to be widely in place.

The one area where tobacco product advertising continues to take place is at (POS), with 23% of marketplaces having POS advertisements for cigarettes or other tobacco products displayed. This was reflected in the survey of retail outlets also, with 31% of retail outlets having cigarettes advertised outside their stores, 17% having cigarettes advertised inside the store and 19% having other tobacco products advertised outside the store. This implies that violation of the ban on advertising of cigarettes and other tobacco products continues at Point-of-Sale, calling once more for greater attention to the regulation of retail outlets selling tobacco products. According to Pakistan's existing TC laws, advertising tobacco products in any form, including POS, attracts a fine of PKR 5000 for the first offence and up to PKR 100,000 for subsequent offences, which local authorities need to impose on violators.

As with requirements for ban on sales to minors, graphic health warnings and excise stamps, ensuring compliance with the ban on TAPS needs to be incorporated into a new tobacco trade licensing framework, with continuation of licenses conditional on compliance with these TCL provisions.

## 6. Recommendations to address enforcement gaps:

### i. Establish local institutional arrangements for implementing existing TCLs:

Federal and provincial governments must establish multisectoral district level tobacco control cells/committees for TCL implementation in all districts, with participation from national and provincial

TCCs, Departments of Health, district administration and police, TSFC staff, civil society members, members of the judiciary, and other relevant stakeholders. The cells/committees must be tasked with oversight of tobacco control enforcement and setting targets, assigning responsibilities, establishing rules (where necessary) and approving plans for TCL implementation across all areas including public smoking ban, underage sales, retail restrictions, packaging restrictions, ban on TAPS, and others).

This must be accompanied by the establishment of District TCL enforcement task forces with adequate budgetary and human resources allocated from the provincial (and in the case of Islamabad, federal) budgets. The taskforces must include key local administration officials and be given the responsibility of monitoring, imposition of penalties, and stakeholder engagement (with public place staff, transporters, traders/retailers, and others) to sensitize regarding stakeholder roles for compliance with TCLs. Where necessary, training and capacity building on TCL enforcement must be organized for key district officeholders. The taskforces must then devise district plans for phased implementation of TCLs based on the local context and local priorities.

#### ii. Communicate responsibilities to authorized staff at public places/transport:

The taskforces must ensure that detailed legal responsibilities and rules for TCL compliance are communicated to authorized staff at public places, public transport and business establishments, in order to ensure compliance with Sections 6, 5, and 10 of the Prohibition of Smoking and Protection of Nonsmokers Health Ordinance 2002. These responsibilities must encompass duties to install required signage, fixtures and facilities, remove ashtrays, supervise observance of rules and take reasonable steps to discourage individuals from breaking the law regarding public smoking, including ejecting them from the premises for violation and establishing their own penalties. Particular focus should be given to public transport staff where violations are widespread and there is a high degree of exposure to smoke among passengers.

#### iii. Employ 'healthy settings' approaches for smoke-free places:

Tobacco control must be integrated in relevant subnational development plans and local programs, especially through operationalizing the healthy settings-based approach, a holistic and multi-disciplinary method which integrates action to address NCD risk factors across sectors and places. The goal is to maximize disease prevention via a "whole system" approach, focusing on ensuring healthy habits and practices (including no-smoking zones) within settings that are defined as 'having physical boundaries, a range of people with defined roles, and an organizational structure'<sup>1</sup>, including workplaces, schools, hospitals, and marketplaces, among others.

#### iv. Engage traders and other supply chain stakeholders to enforce retail restrictions:

To address widespread TCL violations at the retail level, traders/vendors involved in sale of cigarettes and other tobacco and nicotine products must be engaged to ensure compliance with retail restrictions as enshrined in Section 8 of the Prohibition of Smoking and Protection of Nonsmokers Health Ordinance 2002 on prohibition of sale of cigarettes and tobacco products to minors, Section 9 of the Ordinance on prohibition of storage, sale and distribution of cigarettes, etc., in the immediate vicinity of educational institutions, SRO 72(I)/2020 on Ban on TAPS and POS advertising, SRO No.86, 87 (KE)/2009 on Printing of pictorial health warning on Cigarette packs, and SRO 415(I)/2018 on Ban on Sale of Cigarettes in Loose Form (open cigarette sticks).

---

<sup>1</sup> WHO (1998) Health Promotion Glossary. 'Settings for Health'

Particular emphasis must be paid to the need for implementing of ID checks by retailers for age verification for buyers of cigarettes and other tobacco products, sale of tobacco products in the vicinity of educational institutions, placement of tobacco products away from children's products, and ban on sale of loose cigarettes. There must be communication of zero tolerance for all kinds of tobacco product advertisements, particularly POS advertisements at the retail and marketplace level.

#### **v. Monitor compliance and penalize violators:**

District taskforces and responsible enforcement officials must carry out regular monitoring exercises at all categories of public places, PSVs, retail outlets and marketplaces to collect data on status of TCL implementation and compile reports for district tobacco control cells/committees. Monitoring must be accompanied by enforcement raids that impose penalties on violators, with adequate support from magistrates for prosecution and reinforcement of executive actions.

#### **vi. Build multisectoral enforcement capacity beyond the state:**

To make up for limited enforcement capacity, efforts must be made to involve communities, national and local civil society, and other relevant stakeholders as active partners in the process of implementing and enforcing measures to enforce tobacco control laws. Government authorities like TSFC and district taskforces can take the lead by conducting and co-organizing activities and campaigns to promote 100% protection from exposure to tobacco smoke in government offices, schools, public places, hospitals, educational institutions, private offices, and other key areas as appropriate. Community groups also need to be engaged, sensitized and empowered to take action to protect the public (particularly vulnerable groups like children and the sick) from exposure to tobacco smoke through approaches like community-based participatory enforcement. Digital platforms can be explored for monitoring compliance and lodging complaints against violations of TCLs in public places and retail outlets that can be acted upon by district taskforces.


#### **vii. Establish retail licensing for sale of tobacco products:**

Given the widespread violations of TC laws at the retail level, there is a need for the establishment of a licensing framework for the sale and trade of all tobacco products that can create TCL compliance requirements for maintenance of licenses. Compliance requirements for licensing can be devised for ban on underage sales, ban on TAPS, product placement, distance from educational institutions, and ensuring compliance of tobacco product stocks with graphic health warnings and track-and-trace requirements. The establishment of a retail licensing framework for tobacco products will be of immense utility for TCL enforcement purposes and will enable self-reporting and compliance at the retail level.

---

**E N D   O F   R E P O R T**

D&P by: **Friends Graphics**  
0333-5548578



**Heartfile - The National Heart Foundation of Pakistan**  
One, Park Road, Chak Shahzad, Islamabad, Pakistan  
**E.** [info@heartfile.org](mailto:info@heartfile.org) | **W.** [heartfile.org](http://heartfile.org) | **X.** [@heartfiletweets](https://twitter.com/heartfiletweets)  
**T.** +92 -51-2616521 | +92-51-8358584, **HHF Helpline.** +92-51-2614472  
**F.** <https://www.facebook.com/HeartfileTheNationalHeartFoundationofPakistan/>