

Position Statement

Further tobacco retail reform: removing the last forms of advertising (price boards, signage, specialist tobacconists, specialist e-cigarette retailers & tobacco vending machines)

August 2017

Recommendations

Quit Victoria, Cancer Council Victoria and the Heart Foundation (Victoria) recommend the following actions be taken as a priority:

- (1) The State Government amend the Victorian Tobacco Act to further ban brand and price promotion by banning price boards from retailer outlets in line with the ACT and Queensland.
- (2) The State Government amend the Victorian Tobacco Act to ban all signage at all retail outlets.
- (3) The State Government amend the Victorian Tobacco Act to completely remove the display ban exemptions for specialist tobacconists and specialist e-cigarette retailers.
- (4) The State Government amend the Victorian Tobacco Act to introduce a complete ban on the sale of tobacco products via vending machines.

1.0 Introduction

Tobacco is one of the most widely available products in Australia. There are more places that you can buy tobacco than you can buy milk (1, 2). This widespread availability can contribute to the idea that tobacco is a normal part of everyday life, is like any other grocery product and relatively harmless.(1-3)

In Victoria a range of comprehensive tobacco control measures have worked together to reduce the prevalence of smoking and denormalise smoking. Despite the tightly regulated environment in Victoria, tobacco advertising and promotion continue in a range of forms. Tobacco advertising creates positive product imagery and associations, produces the view tobacco is an everyday commodity and can act as a visual cue that prompts people to smoke. Tobacco advertising in a retail environment is of particular concern given the thousands of retail outlets that sell tobacco and that this advertising is taking place where products can be purchased on impulse.

In October 2016, the Victorian Parliament passed new laws regulating retail advertising of electronic cigarette ('e-cigarette') products. The new laws are a positive step, given the potential adverse health effects associated with e-cigarette use. However, under the new laws, price boards, signage and specialist e-cigarette retailers will remain as avenues for advertising and promotion of e-cigarettes. The advertising and promotion of e-cigarettes is of concern, particularly in view of recent research which suggests that e-cigarette advertising has the potential to promote tobacco use (and therefore may act as a form of tobacco advertising)(4).

The WHO FCTC Article 13 recommends a *complete ban* on advertising and promotion of tobacco products and tobacco use. Quit Victoria, Cancer Council Victoria and the Heart Foundation (Victoria) believe that further restrictions are required in Victoria to remove the last forms of tobacco advertising in retail environments. This includes the removal of price boards, removal of tobacco related signage, POS display bans extended to specialist tobacconists, and the banning of vending machines. Similarly, we believe that further restrictions are required in Victoria to remove the remaining forms of advertising of e-cigarette products in retail environments.

2.0 The current legislation in Victoria

2.1 Point of Sales (POS) display bans and price boards

In Victoria from 1 January 2011 the display of tobacco products and packaging was banned (amendment to the Tobacco Act 1987). An exemption applies to on-airport duty free shops and certified specialist tobacconists. Retailers are permitted to display an A4 size prescribed sign to show customers that they sell tobacco.

Price tickets and price lists are not permitted but retailers are allowed to use one prescribed price board to inform customers of what products are for sale and the price. Price boards must:

- be no bigger than 1.5m by 1.5m
- have lettering and numbering no bigger than 2.1cm high by 1.5cm wide
- have all lettering and numbering in the same font, font size and font style
- be printed on one side only in either black and white or in up to four colours, none of which is fluorescent
- not be lit or displayed in a way that makes the price board more noticeable than other signs or price tickets in the shop
- contain one of the prescribed graphic health warnings on or immediately next to the price board
- not contain information relating to one product that is depicted so as to be more distinctive than the information relating to another product.

Price boards can list information about:

- the brand of tobacco products available for sale
- the flavour of tobacco products available for sale

the pack sizes available for sale the prices of tobacco products available for sale (but not any discount pricing information or other information designed to identify a product as discounted).

2.2 Signage

Retailers are required to display:

- 1 x A4 “We don’t sell tobacco to U/18s”
- 1 x A3 health warning or cessation
- If they use a price board, they must display an A4 graphic warning

Retailers are permitted to also display:

- 1 x A4 “We Sell Tobacco Here”

The A4 size prescribed sign “We Sell Tobacco Here” is produced by the Victorian Government and is available to download from the Department of Health’s website.

2.3 Specialist tobacconists

Specialist tobacconists are exempt from the POS display ban. A certified specialist tobacconist is a retail business which:

- Derived 80% or more gross turnover from the sale of tobacco products in the 12 months immediately preceding the application, and
- Operates from a premises which is separated from any other retail premises by a wall, and
- Operates from a premises which does not open directly to another retail premises, and
- Does not sell products or services for children or adolescents, and
- Does not sell food or beverages other than low-risk, shelf stable foods and beverages, and
- Clearly identifies itself as a specialist tobacconist through the use of external branding containing the words: tobacco and/or tobacconist and/ or cigarettes, and
- It does not identify itself as a newsagent through external or internal branding and only sells local, state and national/ daily/ weekly newspapers, and
- Is certified by the Secretary, Department of Health.

As of 1 April 2014, businesses can no longer apply to become specialist tobacconists, a status which exempts them from product display bans. Existing certified specialist tobacconists are still exempt from the bans, however if a certified business transfers ownership, ceases, has its certification cancelled or moves location, it is no longer able to re-apply for certification.

2.4 Vending machines

Cigarette vending machines are still permitted in bar areas of licensed premises, casinos and bottle shops. Vending machines must be visible to and monitored by staff.

Vending machines may only be located:

- in the bar areas of licensed premises – in the line of sight of, and not more than five metres from, the outer edge of the bar counter
- at approved venues and casinos – in the line of sight of a service counter
- at bottle shops – immediately next to the service counter

POS display bans apply to vending machines. Tobacco products or packaging must not be visible inside or outside of the vending machine. Vending machines can display prescribed price tickets to show price and other information about the tobacco products for sale.

Price tickets:

- must be no bigger than 5cm wide and 7cm high
- must have lettering no bigger than 2.1cm high by 1cm wide
- must be printed in either black and white or in the corporate colours of your shop or outlet (up to four colours, none of which is fluorescent)

Price tickets can list:

- name of the product line
- strength of the product line
- flavor and number of items contained in the product line
- average weekly sales of the product line
- any identifying category information related to the product line
- a barcode or similar identifying code of the product line
- country of origin of the product line, including any symbol representing the country of origin

2.5 Form of notices/price boards

Under the current provisions, tobacco retailers, certified specialist tobacconists and on-airport duty free shops are permitted to use one notice (that is, a price board) at each point of sale provided that the notice complies with the requirements set out in the regulations. The regulations may prescribe the size and content of the notice, as well as manner in which the content is set out.

As of 1 April 2014, the regulations may also prescribe the form in which the notice is displayed (s 6(3)(ca) and (cab)).

2.6 Electronic cigarettes

On 13 October 2016, the Victorian Parliament passed the *Tobacco Amendment Act 2016 (Vic)* ('the Amendment Act'). The Amendment Act extended many of the controls on retail advertising of tobacco products so that they also now apply to e-cigarette products.

For example, the display of e-cigarette products in retail outlets is prohibited, and retailers of e-cigarettes are permitted to display a single sign (in the prescribed form) which informs customers that the retailer sells e-cigarette products.⁽⁵⁾ In addition, e-cigarette retailers are permitted to display a single price board to inform customers of the e-cigarette products that are available for sale, and their prices.⁽⁶⁾ The requirements for e-cigarette price boards are similar to those that apply to tobacco price boards (discussed further above).⁽⁷⁾

Under the new laws, an exemption to the advertising restrictions exists for 'specialist e-cigarette retailers'. The exemption is broadly consistent with the exemption for specialist tobacconists. Various criteria need to be satisfied before a business is eligible for certification as a 'specialist e-cigarette retailing premises'. Among other things, a business is only eligible for certification if an e-cigarette retailing business has been carried on at the premises since 1 September 2016, and the business predominantly sells e-cigarette products.⁽⁸⁾

Under the new laws, sale of e-cigarette products by vending machine is prohibited across Victoria.

The new laws came into effect on 1 August 2017.

4.0 Legislation in other states and territories

Table 1: Overview of retail legislation in States and Territories

| Jurisdiction | Price boards | POS exemptions for Specialist Tobacconists | Vending machines | E-cigarettes |
|--------------|--------------|--|--|---|
| ACT | x | No exemptions | Vending machines are banned in the ACT under section 16 of the | Advertising, displays and marketing are restricted under Part |

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| | | | <i>Tobacco Act 1927</i> . It is offence to place a vending machine on premises and the machine is used or is available for use by members of the public. The law, therefore, does not restrict the use of a vending machine for storage of tobacco that is then operated by a retail assistant when a tobacco product is requested for purchase. | 4 of the <i>Tobacco Act 1927</i> (ACT). |
| NSW | ✓ | No exemptions | Permitted in licensed venues and casinos. | Advertising, display and promotion are regulated under Part 2 of the <i>Public Health (Tobacco) Act 2008</i> (NSW). |
| NT | ✓ | No exemptions | Permitted in liquor licensed premises. | No restrictions on advertising, display or promotion. |
| QLD | x | No exemptions | Permitted only in licensed venues and casinos. | Advertising, display and promotion are regulated under Part 2A of the <i>Tobacco and Other Smoking Products Act 1998</i> (QLD). |
| SA | ✓ | No exemptions | Permitted only in licensed venues and casinos. | No restrictions on advertising, display or promotion. |
| TAS | ✓ | No exemptions | Permitted only in licensed venues. | No restrictions on advertising, display or promotion. |
| VIC | ✓ | No end date | Permitted in licensed premises, casinos and bottle shops. | Restrictions on advertising, display and promotion will apply from 1 August 2017. |
| WA | ✓ | No end date | Permitted only in | No direct restrictions |

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| | | | licensed premises and a mines amenity. | on advertising, display or promotion. However, under s 106 of the <i>Tobacco Products Control Act 2006</i> (WA), retail sale of electronic cigarettes is effectively prohibited. ¹ |
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5.0 A call for further tobacco retail reform

5.1 Rationale for a complete ban on advertising

The Article 13 of the WHO FCTC recommends a complete ban on advertising and promotion of tobacco products and tobacco use. Article 1(c) of the WHO FCTC defines “*tobacco advertising and promotion*” as “*any form of commercial communication, recommendation or action with the aim, effect or likely effect of promoting a tobacco product or tobacco use either directly or indirectly.*”

Tobacco advertising creates positive product imagery and associations and produces the view tobacco is an everyday commodity. Youth exposed to tobacco advertising hold positive attitudes towards tobacco use(9) and advertising is a key influence on youth to initiate smoking.(10-12) Bans on advertising tobacco are effective in reducing tobacco use and denormalising tobacco products. (13, 14)

In an environment of increasing tobacco control and restrictions on tobacco advertising the POS environment became an important avenue for promoting cigarettes.(15) Tobacco companies increasingly developed and channelled resources into POS marketing and POS displays grew in size and prominence in the years following increasing/mounting advertising bans.(12, 15-18) With the removal of POS display bans tobacco companies are now directing their efforts and expenditure to other promotional strategies for example, price boards.(19)

In Victoria price boards, signage, specialist tobacconists and vending machines are remaining avenues for advertng and promotion of tobacco use. We believe that further restrictions are required in Victoria to remove the last forms of tobacco advertising in retail environments.

As noted further above, from 1 August 2017 restrictions on retail advertising of e-cigarette products will come into effect which broadly mirror the existing restrictions on retail advertising of tobacco products. Again, price boards, signage and specialist e-cigarette retailers will remain as avenues for advertising and promotion of e-cigarettes.

Although e-cigarettes may be less harmful than traditional cigarettes, they are not harmless. The remaining forms of advertising for e-cigarette products are of concern, as research continues to emerge regarding the potential adverse health effects of e-cigarettes. For example, studies have shown that the chemical combinations used in e-cigarettes may have an adverse impact on respiratory function and the cardiovascular system when inhaled(20-22). They may also have an adverse effect on immune function (23).

The remaining forms of e-cigarette advertising also have the potential to promote tobacco use among consumers. Specifically, recent research has found that exposure to e-cigarette advertising may increase former smokers’ desire to start smoking regular cigarettes again.(4)

¹ Pursuant to s106 of the *Tobacco Products Control Act 2006* (WA), a person must not sell any food, toy or other product that is not a tobacco product but is ‘designed to resemble a tobacco product or package’. The application of this provision was tested in the case of *Hawkins v Van Heerden*. In that case, the WA Court of Appeal found that an electronic cigarette was a product ‘designed to resemble a tobacco product’.

Given the adverse health effects of e-cigarette use and the potential for e-cigarette advertising to promote tobacco use among former smokers, we believe the last forms of e-cigarette advertising should also be removed.

5.2 A call to ban price boards

Quit Victoria, Cancer Council Victoria and the Heart Foundation (Victoria) are concerned that price boards are being utilised as a form of advertising. Price boards occupy the prime real estate in a retail environment, right behind the counter where every customer, whether purchasing tobacco or not, is exposed to the advertising. In addition, the allowance of 'specials' tickets on price boards further highlight tobacco products and promote purchase. There is emerging evidence suggesting that tobacco companies may be working with retailers to secure prominent price board positioning for the brands that they hope to promote, in the same way they have done to ensure prime placement of brands in tobacco displays(19).

A 2012 study of tobacco retailers in Melbourne (19) found that of the stores audited that had price boards 11% arranged them alphabetically, 2% by price and 87% (154 stores) in some other way. There was evidence of the top positions on the price boards being owned by the same tobacco company and whether brands at the top of the board were from the value, mainstream or premium market segment was often dependent on Socio-Economic Status (SES) area.

In 143 of 154 stores at least three of the top four positions were devoted to brands owned by the same tobacco company. In 78 stores, half or more of the top brands were owned by BATA, compared with 55 stores for PMA and 24 for ITA. In 93 stores 75% or more of the top-listed brands (i.e. at least 3) belonged to the same company. On average 55% of the top three or four brands listed on price boards were premium brands, 20% mainstream and 26% were value brands.

The number of top price board positions given to premium brands differed significantly by SES, with much higher percentage found in mid and high SES areas than low SES areas (56%, 62%, 39% respectively). The number of prominent positions occupied by value brands varied by SES area also. Low SES areas had more value brands listed in top positions than stores in mid -or -high SES areas (43%, 23% and 15% respectively). The greater promotion of premium brands in high SES areas where smokers can afford to pay higher prices provides a greater profit margin for the tobacco industry and retailers and the greater promotion of value brands in low SES continues to promote smoking as affordable for those on lower incomes.

A more recent study of tobacco retailers in Melbourne found that there was a notable shift in the type of products listed at the top of price boards over a three year period between 2013 and 2015.(24) The period spanned the introduction of three 12.5% increases in tobacco excise duty (in December 2013, September 2014 and September 2015). While premium brands had been most commonly listed at the top of price boards in 2013, researchers observed that the proportion of super-value and value brands had significantly increased by 2015. In addition, packs of 20's had become more prevalent, replacing 25's as the pack size most commonly listed at the top of price boards. Brands produced by smaller manufacturers (which tend to be cheaper), also increased in prevalence over the study period. The study indicates that tobacco tax increases are being undermined through the use of price boards as a means of promoting low-cost tobacco products over other tobacco products.

Overall, the above evidence suggests that tobacco companies in Victoria are using price boards as a form of advertising and promotion. Under Victoria's new e-cigarette laws, retailers are permitted to display price boards for e-cigarette products. E-cigarette price boards are therefore likely to be used by e-cigarette companies as a promotional tool in a similar manner to tobacco price boards.

Two jurisdictions in Australia have banned tobacco and e-cigarette price boards – ACT and Queensland (see Table 1). Removal of tobacco and e-cigarette price boards from retailers in Victoria would eliminate one of the last forms of advertising available to tobacco and e-cigarette companies in a heavily regulated environment.

Recommendation

Quit Victoria, Cancer Council Victoria and the Heart Foundation (Victoria) recommend that the State Government amend the Victorian Tobacco Act to further regulate brand and price promotion by banning price boards from tobacco and e-cigarette retail outlets, in line with the ACT and Queensland.

5.3 A call to remove signage

According to definitions in Article 1 of the WHO FCTC a comprehensive ban on all tobacco advertising and promotion applies to “any form of commercial communication, recommendation or action with the aim, effect or likely effect of promoting a tobacco product or tobacco use either directly or indirectly.”

The A4 size prescribed sign “We Sell Tobacco Here” is a promotion of *tobacco use* and is essentially another form of advertising and an encouragement to purchase. Like any other form of advertising it can act as a visual cue that prompts purchase and promotes smoking and a potential visual cue which may trigger relapse or make it more difficult for people trying to quit. Alarming, research indicates that the use of this signage has increased dramatically in recent years. One study of Melbourne tobacco retailers showed that in 2013 only 40.1% of retailers displayed the “We Sell Tobacco Here” sign. By 2015, the proportion of stores displaying the sign had more than doubled to 84.1%.(25) The findings suggest that tobacco retailers are increasingly using all available means to promote tobacco sales. We believe that retailers do not require this type of signage as it is inconceivable that current smokers do not know where they can purchase tobacco.

We believe that all other signage should also be removed. The A3 health warning and cessation signage should be removed as they are no longer essential if price boards are banned. We believe due to the introduction of plain packaging and larger health warnings on tobacco products, further health warnings at the POS are not necessary as smokers are exposed to health warnings and cessation messages via their tobacco products.

Recommendation

Quit Victoria, Cancer Council Victoria and the Heart Foundation (Victoria) recommend that the State Government amend the Victorian Tobacco Act to ban all signage at all retail outlets.

5.4 A call to remove the display ban exemption for specialist tobacconists and specialist e-cigarette retailers

While the State Government has amended the Tobacco Act to cease new applications for specialist tobacconist certification in an effort to reduce the number of retailers that are exempt from the display ban, existing tobacconists are still able to display tobacco products. There are approximately 145 certified specialist tobacconists in Victoria, which means that Victorians will still be exposed to tobacco advertising and visual cues that prompt people to smoke. Comprehensive advertising bans are essential to reducing the health burden of tobacco use.

The majority of other states and territories do not have exemptions in place for specialist tobacconists (see Table 1). Western Australia and Victoria are the only jurisdictions that still have exemptions in place).

As noted further above, new laws regulating retail advertising of e-cigarette products came into effect on 1 August 2017. The new laws include an exemption for specialist e-cigarette retailers. Of all jurisdictions in Australia with laws in place regulating retail advertising of e-cigarettes, Victoria is the only one with an exemption for specialist e-cigarette retailers.

The State Government is well behind best practice.

Recommendation

Quit Victoria, Cancer Council Victoria and the Heart Foundation (Victoria) recommend that the State Government amend the Victorian Tobacco Act to completely remove the display ban exemptions for both specialist tobacconists and specialist e-cigarette retailers.

5.5 A call to ban all tobacco vending machines

As noted further above, from 1 August 2017 the sale of e-cigarettes by vending machine will be prohibited in Victoria. However, tobacco vending machines are still permitted in licensed premises, in bottle shops, and at approved venues and casinos.

Tobacco vending machines within licensed venues continue to promote the association between socialising, alcohol and smoking. Banning tobacco vending machines from licensed premises, casinos and bottle shops would help to further denormalise smoking, and would eliminate a potential visual cue which may trigger relapse or make it more difficult for people trying to quit.

Vending machines accessible to the public are banned in the ACT under section 16 of the *Tobacco Act 1927*. Vending machines for storage of tobacco that are operated by a retail assistant when a tobacco product is requested for purchase are permitted.

A ban on tobacco vending machines in Victoria would implement the recommendation in the World Health Organizations guidelines for implementation of Article 13 of the Framework Convention on Tobacco Control, that:

"[v]ending machines should be banned because they constitute, by their very presence, a means of advertising and promotion."(26)

Recommendation

Quit Victoria, Cancer Council Victoria and the Heart Foundation (Victoria) recommend that the State Government amend the Victorian Tobacco Act to introduce a complete ban on the sale of tobacco products via vending machines.

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6. See section 6(3)(cab) of the *Tobacco Act 1987 (Vic)*, as amended by section 9(7) of the *Tobacco Amendment Act 2016*.
7. See reg 10 of the *Tobacco Regulations 2017 (Vic)*.
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