Tobacco advertising, promotion and sponsorship: Enforcing comprehensive bans

Facilitators' Guide
WHO Library Cataloguing-in-Publication Data

Building capacity for tobacco control: training package.


ISBN 978 92 4 150135 4 (NLM classification: HD 9130.6)
Tobacco advertising, promotion and sponsorship: Enforcing comprehensive bans

Facilitators’ Guide
INTRODUCTION

The overall goal of this training workshop is to help low- and middle-income countries to implement and enforce comprehensive bans on tobacco advertising, promotion and sponsorship (TAPS). The workshop is designed to assist countries that are Parties to the WHO Framework Convention on Tobacco Control (WHO FCTC) to fulfill their obligations under Article 13 of the Convention. The training is also relevant to those countries that have genuine constitutional limits to a comprehensive ban on TAPS, as they are required to implement restrictions to the maximum extent.

The training aims specifically to equip participants with the knowledge and skills to advocate for, achieve and implement legislation that comprehensively bans TAPS within the required timeline of five years.

“Tobacco advertising and promotion” is defined by the WHO FCTC 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 sponsorship” means any form of contribution to any event, activity or individual with the aim, effect or likely effect of advertising, promoting or sponsoring a tobacco product or tobacco use either directly or indirectly.

The training is best delivered to participants from a single country over three days in order to address in sufficient detail the specific and diverse strategic issues that arise in that country. However, a combined workshop may be feasible for countries with a common language, similar legal systems, and that are at the same stage of implementation.

The training content is based on:
- Article 13 of the WHO FCTC which requires Parties to implement comprehensive bans on TAPS within five years of ratifying the Convention; 1
- Guidelines for the implementation of Article 13 adopted by the Conference of Parties; 2
- WHO’s MPOWER package; 3
- evidence, best practices and lessons learned from countries that have implemented bans on TAPS.

TARGET AUDIENCE

The target audience for this training is representatives of government and civil society responsible for developing, implementing, enforcing and evaluating comprehensive bans to fulfill obligations under Article 13 of the WHO FCTC. Participants may also include legal advisers to government, and members of government drafting committees and other legislative bodies. The workshop would also be appropriate in countries that are not yet Parties to the WHO FCTC, since it will assist them to implement a comprehensive ban on TAPS.

Participants should be reminded of obligations under Article 5.3 whereby Parties to the WHO FCTC are required to protect public health policies from interference by the tobacco industry.

THE ISSUE: TOBACCO ADVERTISING, PROMOTION AND SPONSORSHIP

It is well documented that TAPS increase tobacco consumption and that partial bans have little or no effect on tobacco consumption. 4

Multiple forms of direct and indirect TAPS are creatively used by the tobacco industry to target and recruit new tobacco users – particularly young people and women. They use such means as television, print, radio, internet, point-of-sale displays, product placement in films, brand stretching, and sponsorship of sports, cultural and music events. While some countries have banned or restricted the use of direct TAPS, tobacco promoters are increasingly using indirect forms to circumvent restrictions.

1 The WHO FCTC is available in the six official languages of WHO at: http://www.who.int/fctc/text_download/en/index.html.
Comprehensive bans of TAPS, however, are effective in decreasing the consumption of tobacco products. Research shows that some countries have experienced a decline in consumption of up to 16% after the introduction of advertising bans. A study of 22 high-income countries concluded that more comprehensive bans on TAPS reduced tobacco consumption by up to 7.4%. The study showed that the downward trend in tobacco consumption is much steeper in countries with bans than in those without bans, and that partial advertising bans or voluntary agreements had little effect.

Although the situation is improving, many countries have partial bans but do not enforce them consistently. Around 50 countries have no restrictions at all.

There are many benefits to be gained from banning TAPS. These include making it more difficult for the tobacco industry to:

- motivate young people to start using tobacco;
- target other vulnerable groups, including women;
- reassure current tobacco users;
- glamorize tobacco use;
- increase the social acceptability of tobacco use.

**WHO FCTC REQUIREMENTS**

Under Article 13 of the WHO FCTC, Parties must implement measures for a comprehensive ban on direct and indirect TAPS. This includes cross-border TAPS originating in their territory or entering their territory from another country. The small number of Parties with genuine constitutional limits must adopt restrictions to the maximum extent.

**Pre-reading materials for participants: Approximately 4 hours**

Before attending the training workshop, it is recommended that participants read the key materials in the pre-reading list and complete the checklist of known forms of TAPS.

**Training workshop length: 3 days**

Most of the first day of the workshop will consist of the presentations of information, combined with discussions, a skill-building exercise, and the introduction to strategy development for comprehensively banning of TAPS. The second day will focus on assessing and developing the legislative plan in groups combined with skill-building exercises. The final day focuses on fine-tuning the action plans, discussing tangible next steps for participants and a final skill-building exercise that allows participants to practice “selling” their strategy to others in their country.

**LEARNING OBJECTIVES, SKILL DEVELOPMENT AND OUTCOMES**

**Learning objectives**

Knowledge of the background and rationale for comprehensively banning TAPS including:

1. WHO FCTC obligations and processes
2. Overview of issues:
   - Evidence linking TAPS to increases in consumption, types of promotion (including direct and indirect promotions) and why partial bans do not work.
   - Common loopholes in legislation, including poor definitions, partial bans, inadequate enforcement and penalties.
   - Best practice recommendations that include but are not limited to:
     - banning direct TAPS;
     - banning indirect TAPS, including brand stretching and brand sharing;
     - banning tobacco sponsorship originating from both inside and outside the territory;
     - banning product displays and vending machines;
     - measures to reduce the impact of tobacco use in entertainment media, including prohibiting identifiable tobacco brands or imagery, requiring anti-tobacco advertisements, and implementing a rating system that takes depictions of tobacco into account;
     - plain packaging to remove design features that make products attractive.

---

• Compliance monitoring and enforcement, including:
  − an independent authority to monitor and enforce the law with adequate resources, powers and dissuasive penalties;
  − a role for civil society in monitoring and enforcement of the law, including a toll-free complaint hotline and web site so that the public can report violations.

3. Overview of tobacco industry arguments and tactics, including:
• economic and legal arguments, such as claiming that bans are bad for business, or are an infringement of the right to freedom of speech and of intellectual property rights under international trade agreements;
• corporate social responsibility (CSR) or sustainability reports (a public relations tool to re-invent the industry’s image by funding charities, education, cultural events and ineffective youth smoking prevention campaigns in order to gain influence and credibility).

Skill-building exercises
1. Role play on convincing legislators of your plan. Summary of key arguments in your country and role play of meeting with your Minister or high-level leaders.
2. Role play on countering the tobacco industry. Development of strategic response. This envisages an enforcement/compliance scenario where industry is circumventing the law with indirect TAPS and there is no real threat of dissuasive penalties. Participants develop and present their response.
3. Exercise in assessing legislation and the political environment, including skills in drafting comprehensive clauses in legislation to avoid loopholes.
4. Role play on convincing the public. Discussion of messages and communication strategies. This takes the form of a public debate with opponents of comprehensive bans (e.g. tobacco retailers, advertising agencies).

Skills developed
1. Ability to formulate a strategic plan to develop, implement and enforce comprehensive legislation based on evidence and best practice.
2. Ability to identify the resources and support (technical, legal and human) needed to implement the plan and achieve the goals.
3. Ability to respond to and counter opposition through skilled debate and strategic action.

Outcomes
1. The tangible outcome will be a national strategic action plan developed by participants, taking into account the specific situation, needs and goals.
2. Enhanced understanding and collaboration between participants and organizations implementing legislation and enforcement.

STRUCTURE AND CONTENT

The training consists of nine modules or sessions. These address content themes and aspects of strategic planning for implementing comprehensive legislation.

If all nine sessions are used, the overall workshop duration is three days.

However, the duration of and detail covered in each session should be adapted to the needs of the participants, taking into account their experience and knowledge of the issue, the stage of the debate on TAPS, the stage of implementation and any specific challenges and opportunities.

For instance, countries that have passed good legislation and are at the stage of closing loopholes and/or improving enforcement will benefit much less from the introductory presentations and much more from the strategic planning exercises that focus on implementing a comprehensive ban and improving enforcement.

Workshop organizers and facilitators should gather as much information as possible about the country situation and the knowledge, skills and needs of participants prior to the workshop. Adjustments to the workshop content and structure can be made according to the situation. For more guidance, see “Preparing for the training” (below).
Session content
Each of the nine sessions addresses a specific phase or issue that commonly arises in implementing comprehensive and enforceable legislation. All sessions include an introductory presentation followed by discussions, skill-building exercises or strategic planning exercises.

The strategic planning sessions are guided by the Participants’ Workbook that is the companion to this guide.

These sessions will help participants in several ways, namely:
1. Assess current situation
   • What legislation currently exists? Is your country a Party to the WHO FCTC?
   • What is strength of the tobacco industry and the full scope of its promotional activities?
   • What is the strength of civil society and legislative/political leadership as potential allies?
   • How strong are public opinion, political will and media interest?
   • Does your country have genuine constitutional arguments against a comprehensive ban?
2. Determine what you want (goal)
3. Determine strategies to achieve your goal(s) such as:
   • Draft a loophole-free law for introduction as a bill, with effective enforcement mechanisms written into the law.
   • Mobilize legislators and high-level officials in support of legislative proposals.
   • Mobilize civil society in support of legislative proposals.
   • Build public support through the media.
   • Counter tobacco industry arguments and tactics.
4. Maintain your achievements
   • Prepare a structure and infrastructure for enforcement that will serve short-term and long-term needs.
   • Monitor industry compliance and enforcement activities.
   • Monitor industry promotional spending, tactics and innovations to circumvent bans.
   • Monitor loopholes and mobilize legislators to modify law or regulations, as needed, to close loopholes.
   • Ensure continued mobilization and support of the public, media and civil society.

The sessions are summarized below. Further guidance for facilitators follows in the Detailed Programme and Guide.

Session 1: Welcome, workshop expectations and issue overview
• Welcome and workshop overview
• Participant introductions and ice-breaker, workshop expectations
• The problem and how to solve it [presentation and exercise]

Session 2: Best practices in banning TAPS
• Using case studies to illustrate best practices from different regions, common legal loopholes, pitfalls, lessons learned and new tactics [presentation and discussion]
• Lessons learned: elements of comprehensive legislation to ban TAPS

Session 3: Countering opposition
• Overview of opponents’ common arguments
• Role plays: countering the opposition [presentation and discussion]

Sessions 4–9: Strategic planning sessions
Session 4: Assessment of current situation: legislative and political environment
Session 5: Enforcement
Session 6: Legislative development
Session 7: Information and communication
Session 8: Evaluation and monitoring
Session 9: Consolidation and wrap-up
PREPARING FOR THE TRAINING

Facilitators of the training, in cooperation with host organizations, are responsible for adjusting training content to the experience and needs of local participants. A needs assessment will be used to identify the gaps, priorities, opportunities and possible solutions. (See Annex 1) The stage of development of comprehensive bans will be relevant in determining any adjustments. Various forms of TAPS can be identified by participants using the checklist in the pre-reading materials as part of the preparation for the training.

Ideally, at least one facilitator will have worked closely with the country and will be familiar with the local situation. Facilitators should also gather information before the workshop. This can be done through, for instance, interviews and questionnaires.

Interviews
Interviews (by phone, face-to-face or email) can be held with key informants regarding the country situation, needs and desired workshop elements and outcomes. Key informants may include government officials and policy-makers responsible for development of legislation, Bloomberg Initiative grant recipients, WHO in-country focal points closely involved in tobacco control legislation, Union in-country consultants or staff, and other in-country technical experts.

Questionnaires
Responses to questionnaires can be very informative. Distribute the questionnaires in advance with the invitations to participants. Include the following questions:

1. What has been done/is planned to identify current examples and the full scope of direct and indirect TAPS?
2. If there are some restrictions on TAPS:
   - What forms are not banned?
   - What has been done/is planned to assess the level of enforcement for banned forms of TAPS?
   - Are there already plans to ban additional forms and, if so, which ones? (i.e. vending machines, internet, cross-border, point-of-sale, etc.)
3. What has been done/is planned to inform and mobilize public opinion on the regulation/legislation coming into force?
4. What has been done/is planned to inform and mobilize key opinion leaders?
5. What has been done/is planned to inform and mobilize key decision-makers?
6. What has been done/is planned to build confidence and develop capacity to enforce?
7. What has been done/is planned to monitor and counter tobacco industry disinformation and tactics?
8. What has been done/is planned to monitor and evaluate the number of complaints, prosecutions and penalties?

The facilitation team should meet prior to the training to analyse the information gathered, assess the needs and adapt the agenda appropriately. They should also identify the most relevant background materials (see below).

Selecting participants
The training is targeted at persons responsible for developing and implementing comprehensive legislation at national or subnational levels, or through a combination of laws, depending on the assessment of what will work best. The participants may include government officials, policy-makers, decision-makers and representatives of nongovernmental organizations (NGOs) who will collaborate with government in promoting and implementing legislation.

It is recommended that the training should be conducted with a maximum of 20 participants.

Specifically, participants may include:
- representatives of national government responsible for overall planning of legislation, promoting legislation and preparing for its implementation, enforcing legislation, or monitoring and evaluating the impact of legislation;
- representatives of civil society who will be key partners with the government in the process of developing and implementing legislation (these may include tobacco control and public health organizations, as well as others such as women’s groups, academic institutions, media organizations, medical/health professional associations and consumer organizations);
- relevant project coordinators who are recipients of Bloomberg Initiative grants;
- WHO focal points working closely with jurisdictions in implementation of tobacco control legislation.
The participants will normally include national representatives working on legislation to ban TAPS comprehensively but, depending on the country, may also involve subnational representatives. In selecting participants, political issues often arise as to who is and who is not invited. Obviously, delicate negotiations may be required. To help guide these negotiations, organizers and facilitators need to emphasize that the workshop is not a general awareness-raising programme. It is practical training targeted at those who are closely involved in the implementation of comprehensive legislation.

One follow-up activity may be the dissemination by participants of various components of the training to other audiences. This dissemination will provide an opportunity to involve a wider range of players in the process.

The facilitation team
It is recommended that the training should be delivered by an expert facilitation team identified by WHO and The Union in consultation with key in-country partners. The team should include:
• a lead facilitator with detailed expertise in TAPS and experience in facilitating training workshops;
• two additional facilitators with expertise in one or more aspects of implementing comprehensive and enforceable legislation;
• additional content presenters as necessary.

The facilitation team should be supported by one or more logistical assistants to provide support during the workshop, including production and reproduction of materials.

Good facilitators are critical to the success of the training. In addition to having expertise in tobacco control legislation, facilitators should:
• not be part of the country implementation team, although they should be very familiar with the country situation and key issues;
• be trusted as knowledgeable and friendly but impartial;
• be good listeners and communicators and should be able to feed discussions back to the group with "value added" to help the discussions move forward;
• be observant of group dynamics;
• be willing and able to openly address and resolve conflict and tensions within the group.

The facilitators will be thoroughly trained in delivery of the training package by WHO/Union staff.

Logistics and materials
All of the training and background materials are provided by WHO and The Union. These include:
• pre-reading training materials:
  – WHO FCTC Article 13;
  – WHO FCTC Article 13 guidelines;
  – relevant national/subnational legislation related to TAPS;
  – “How do you sell death...” [www.fctc.org]
(It is recommended that access to pre-reading materials is provided to participants at the earliest possible stage, i.e. upon acceptance of participation. Facilitators may choose to include other pre-reading materials, but experience shows the benefit of keeping the materials to a realistic minimum).
• the Facilitators’ Guide;
• presentations;
• the Participants’ Workbook;
• practical framework for authorities implementing legislation;
• workshop evaluation forms. (See Annex 2 for sample evaluation form.)

The Facilitators’ Guide contains hyperlinks to the relevant materials needed during the training workshop. In addition to online materials, each participant should receive a binder or folder with key printed materials, particularly:
• hand-outs of presentations;
• key resource documents for each theme.
In addition to the materials included in the Facilitator’s Guide, additional background documents are provided under separate cover as part of this training package.

The facilitation team should decide which resources are most relevant to the participants and should be included in the printed materials.

The facilitation team should also ensure that key materials are available in the language of the participants. They should identify and include quality technical resources produced within the country where the training is held (or relevant to it).

One main meeting room will be needed, with one or two additional rooms for small groups if the large room cannot accommodate several small group discussions at the same time. Materials include:

- flipcharts and markers (one for each small group);
- projector and screen for presentations;
- laptop computer with speakers for presentations;
- desktop computer, laser printer and photocopier for document production during the meeting;
- presenter’s microphone;
- portable microphones for discussions and skill-building exercises (optional).

More information and guidance
While this package is intended for use with guidance from staff of WHO and The Union, its components and tools can be used in other contexts to advance the implementation of legislation to comprehensively ban TAPS.

If you use these materials outside the context of a WHO or Union-sponsored training, please let us know. Your experience and feedback will help WHO and The Union to improve the training and to share lessons learned with others.

For feedback, additional guidance or for any other questions about banning TAPS, please contact:

Tobacco Free Initiative  
World Health Organization  
Avenue Appia 20  
1211 Geneva 27, Switzerland  
Email: tfi@who.int  
Telephone: + 41 22 791 21 11  
www.who.int/tobacco/en

Department of Tobacco Control  
The Union  
10 Queen Street  
Edinburgh EH2 1JQ, UK  
Email: tobaccofreeunion@theunion.org  
Telephone: + 44 131 226 2428  
www.tobaccofreeunion.org

ACKNOWLEDGEMENTS

This workshop was developed by Fiona Godfrey, Anne Jones, Tuija Tengvall, and Barbara Zolty under the coordination and direction of Sinéad Jones and Armando Peruga. Materials developed by Sylviane Ratte and Heather Selin were also used in the workshop.

WHO and the Union would like to thank the following peer reviewers of the workshop: Emmanuelle Beguinot, Abdul Sattar Chaudry, Kitti Gunpai, Jonathan Liberman, Penny Marshall, Bungon Rithiphakdee, Reina Roa, Luminita Sanda, and Lin Xiao. WHO and The Union would also like to acknowledge the many organizations and individuals who granted permission for use of their materials as part of the workshop, with particular thanks to the Campaign for Tobacco-Free Kids and the Framework Convention Alliance.

WHO and The Union wish to acknowledge the researchers who have contributed to the evidence base for comprehensive bans on TAPS as well as the governments and NGOs that have achieved more comprehensive bans on TAPS, and in doing so have provided the evidence and experience that informs this training course.

The production of this training package was made possible by funding from Bloomberg Philanthropies.
## GOALS AND EXPECTED OUTCOMES

- Establish a good learning environment and a collaborative atmosphere for the training workshop.
- Establish a common understanding of the training goals.
- Learn about the experience and expectations of participants.
- Establish a basic understanding of the key issues around TAPS, the rationale for comprehensive legislation, and the solution.

## MATERIALS

- Presentation P1 gives an overview of the workshop (summarizing workshop rationale, learning objectives and sessions).
- Presentation P2 on tobacco advertising, promotion and sponsorship (TAPS), the problem and how to solve it.
- Exercise: Key messages on many different types of TAPS, the evidence showing that TAPS increase tobacco consumption, and the need for comprehensive legislation as partial bans are ineffective.

### Hand-outs:
- WHO FCTC Article 13 and WHO FCTC Article 13 Guidelines [to be used as appropriate in all sessions]. [See Annex 1 and Annex 2 in Participants’ Workbook]
- WHO FCTC Article 5.3 Guidelines [to be used as appropriate in all sessions. [See Annex 3 in Participants’ Workbook]
- Training workshop checklist of types of tobacco advertising, promotion and sponsorship (TAPS) [See Annex 4 in Participants’ Workbook]

## DETAILED PROGRAM AND GUIDE

### SESSION 1

| Welcome, workshop expectations and issue overview | 15 minutes | Welcome and workshop overview
| | | Overview presentation (5 minutes) | Powerpoint P1
| | | Participant introductions and discussion of workshop expectations |
| | | 1 hour | Tobacco advertising, promotion and sponsorship (TAPS)
| | | The problem and how to solve it |
| | | Presentation (45 minutes), Questions and answers (15 minutes) | Powerpoint P2
| | 45 minutes | Exercise: Key messages |
| | | Exercise preparation (15 minutes). Review of exercise results (30 minutes) | Document E1
| | Total session time: 3 hours |
DETAILED AGENDA

Welcome and workshop overview

15 minutes

The welcome to the workshop should be given by the organizational host (such as the Ministry of Health or the local WHO or Union Office) or the lead facilitator. The welcome should be limited to 5–10 minutes. The lead facilitator should give the workshop overview, which also should be limited to 5–10 minutes. He/she can use the presentation to summarize:
- the rationale, goals, learning objectives and content of the workshop, drawing on the overview presentation with adjustments for the local situation;
- the workshop process and structure (i.e. presentations, questions and answer sessions, skill practice, and strategic planning exercises);
- the fact that the workshop is designed to meet the needs of the participants and the goals of their jurisdiction(s), and therefore the workshop can be adjusted as necessary over the three days in order to do this.

This session will set the stage for and lead into the next session, which should be very interactive.

Participant introductions and discussion of workshop expectations

1 hour

The purpose of this session is to gain a better understanding of the background, knowledge, skills and workshop expectations of the participants. Although some of this information will have been gathered in advance and adjustments to the workshop made accordingly, this session will build on this information and give facilitators a more dynamic sense of the country situation and of the participants. In particular, the session will:
- introduce the facilitators and participants to one another;
- provide all participants with an opportunity to offer their perspective;
- help facilitators begin to learn the group dynamics of the participants;
- help facilitators to become aware of potential misperceptions about the workshop and to address these as appropriate;
- identify particular areas of interest or strength, or areas for improvement, that may affect the emphasis of different workshop components.

The facilitator should first ask the other facilitators to introduce themselves briefly, and then ask each participant in turn to:
- introduce themselves (name, title, and organization/agency they are representing);
- briefly state what relevant experience they bring to the workshop, whether or not in tobacco control (e.g. “I’m fairly new to the issue but I’ve worked as a legal adviser in the Ministry of Health and have worked on health-related legislation in the past”);
- briefly share their expectations for the workshop, which may be general or personal and may range from wanting to improve specific knowledge or skills to a broader expectation of outcome (e.g. “I hope we come out of the workshop with a good plan for enforcing advertising bans” or “I personally am hoping to improve my knowledge of the issues and learn how to apply them to counter opponents’ arguments for allowing tobacco sellers to advertise and display tobacco products”.

Facilitators should ask questions to draw out information and perspectives if some participants seem reluctant to participate, or if they provide very little information.

Allow about three minutes per participant for the discussion.

After all participants have spoken, the facilitator should respond to common themes as appropriate.
Presentation: TAPS – the problem and how to solve it

1 hour

Deliver presentation P2 on “TAPS – the problem and how to solve it”, using the notes provided.

Summary: The presentation describes the problem of the various forms of direct and increasingly indirect TAPS used by the tobacco industry. It shows why the tobacco industry uses TAPS to promote and increase the use of tobacco products, the rationale for a comprehensive approach, and the solutions based on lessons learned and best practice. This is an overview of the basic evidence and arguments (core content) that participants should be familiar with and should expect to use in promoting comprehensive legislation, including:
- the international legal and policy context that supports comprehensive bans such as the WHO FCTC Article 13 Guidelines and lessons learned from other countries;
- the impact that TAPS have on increasing tobacco consumption, and the scientific basis for the evidence;
- how partial bans do not work and the challenges, including cross-border advertising, loopholes and changing technology;
- why comprehensive legislation is the only effective way to protect whole populations and vulnerable groups such as children, young people and women.

Following the presentation, the facilitator and/or presenter leads a discussion about the information, soliciting questions about the subject.

Exercise: Key messages on how tobacco companies use direct and increasingly indirect TAPS to recruit new tobacco users, target vulnerable groups and undermine efforts by tobacco users to quit

45 minutes

Introduce this exercise to the participants, based on the instructions found in the Participants’ Workbook. If you wish, hand out the written instructions just before introducing the exercise. The hand-out of graphic examples can be used to stimulate discussion on the various types of TAPS.

The purpose of this exercise is to review the main themes of the previous presentation in a scenario that participants will find realistic and practical and that requires them to summarize key arguments quickly, succinctly and persuasively.

The exercise should be completed on an individual basis. Participants are given 15 minutes to complete the exercise – either to prepare a written briefing or to prepare speaking points that they will communicate verbally to the facilitator.

As soon as participants indicate that they are ready, facilitators should begin to review the exercise results on a one-on-one basis, providing constructive feedback.
GOALS AND EXPECTED OUTCOMES

• Provide examples of best practices in implementing and enforcing bans on TAPS in various regions.
• Establish a basic understanding of the elements recommended for successful implementation of comprehensive legislation.

MATERIALS AND DETAILED AGENDA

Presentation P3: Best practices in comprehensively banning TAPS
Presentation P4: Considerations when drafting TAPS legislation

1.5 hours

The purpose of this session is to give participants the opportunity to hear about best practices from around the world, which are summarized in Presentation P3. This presentation lasts 30 minutes with 20 minutes for questions and answers. Presentation P4 aims to address key factors to be considered in the development and implementation of comprehensive TAPS legislation in order to ensure that all types of TAPS are covered and to minimize the chance of loopholes. This brief overview presentation includes key recommendations based on WHO FCTC Article 13 Guidelines. The presentation will provide a context for participants to visualize and plan for their own implementation process. It will not go into great detail, as many components of implementation (such as enforcement and communications) will be addressed in specific presentations or exercises later in the workshop. This presentation lasts 20 minutes, with 20 minutes for questions and answers.

Presentation: Best practices in comprehensively banning TAPS
Presentation: Considerations when drafting TAPS legislation

1 hour

In this session, one hour is devoted to a more in-depth facilitated discussion on what works including the features of successful bans, and best practice lessons, with an emphasis on why comprehensive bans are more effective than partial bans. The workshop may arrange for a speaker who can speak with authority about case studies from relevant regions. This speaker could be one of the facilitators or workshop content experts that participants can
relate to and welcome. The presentation should tell a story and should also focus on key success factors and obstacles that must be overcome that are likely to be factors in other countries.

If you are not sure of whom to arrange as a guest speaker, contact The Union or WHO for advice and assistance in arranging this. They can recommend a speaker from a country with experience most relevant to the needs of the participants.

To stimulate discussion, participants may refer to the checklist of known TAPS in their country and the hand-out of graphic illustrations of TAPS (e.g. "How do you sell death...") in the background materials.

### GOALS AND EXPECTED OUTCOMES

- Provide an in-depth understanding of opposition tactics from the tobacco industry and related third parties with vested interests and how to counter them.
- Participants will have an opportunity to practice articulating arguments for comprehensive legislation and facing and countering opposition.

### MATERIALS

- **Presentation P5:** Countering opposition to a comprehensive ban on TAPS
- **Exercise:** Participants’ Workbook exercise on countering opponents’ common arguments.

### DETAILED AGENDA

Deliver the presentation P5 on “Countering opposition”, guided by the notes provided.

**Summary:** The opponents of comprehensive bans may be any agent or group with a financial interest in the marketing and selling of tobacco products (e.g. tobacco manufacturers, wholesalers, retailers, parts of advertising industry, small business representatives and media agencies).

The strategies and tactics of the tobacco industry are illustrated by recent examples from a variety of countries, drawing on case studies (several links are included in the practical framework).

The presentation also explains how to prepare for and respond to standard industry arguments and myths.

There should be about 15 minutes left for discussion. Participants will probably have examples of opposition in their own country to discuss.
Exercise: A facilitator asks participants to break into small groups (3–5 people). Arrange tables and chairs to simulate a panel interview format that will serve for both role plays [one interviewer facing one or more panellists]. To add some fun, flip charts can be used as signs (“Your Host”, “Smoky Rights” or “Chamber of Commerce”).

Invite each group to role-play the tasks. Half of the groups should complete Task A, and the other half should complete Task B. Refer to Participants’ Workbook for detailed tasks.

GOALS AND EXPECTED OUTCOMES

- Participants will understand the strategic planning process for the workshop.
- Participants will have a common understanding of the legislative situation in their country.
- Participants will have agreed on the goal[s] they want to achieve [such as amendments of the law to close loopholes, or improve enforcement], based on the assessment.

MATERIALS

Practical framework for implementing legislation for comprehensive bans on tobacco advertising, promotion and sponsorship (TAPS) [See Annex 5 in Participants’ Workbook]

Participants’ Workbook: exercise on legislative assessment.
Excerpts from various legislations/regulations on banning tobacco advertising, promotion and sponsorship (TAPS) [See Annex 6 in Participants’ Workbook]

Any existing, related and most recent draft legislation.
Existing relevant consumer products legislation (not necessarily tobacco).

Good practice example from the region.

Training workshop checklist of types of Tobacco Advertising, Promotion and Sponsorship [TAPS] [See Annex 4 in Participants’ Workbook]

**DETAILED AGENDA**

Refer to Participants’ Workbook

**Presentation(s): Overview of country situation**

30 minutes

A designated country representative [someone considered neutral] presents a brief overview of the country situation with regard to the scope of TAPS, including cross-border examples that originate inside or outside the territory. The presentation should be based on the questions and format provided to participants in advance.

Allow time for a second presentation if more than one country is represented. The presentations should be brief, given that participants will discuss the current situation in more detail in the exercise that follows. Some time should be allotted for discussion to allow participants to clarify, correct or discuss points raised.

**Task 1. Exercises**

**Exercise 1:** Refer to Participants’ Workbook

**Exercise 2:** Refer to Participants’ Workbook

Expected outcomes are:

- mapping of main stakeholders and their current or potential role/contribution;
- assessment of the relevance of activities already conducted and/or planned;
- identification of activities that need to be developed or broad gaps between best practice and current situation on each of the components necessary for a comprehensive strategy;
- list of areas and activities that need to be developed [strategies to address these will be the focus of the subsequent exercises];
- identification of main strengths, weaknesses, opportunities and threats within the jurisdiction to develop, implement and enforce smoke free regulation/legislation.

**Note:** As the discussion proceeds, pick up any important points that need to be addressed. If the discussion moves away from the main task and looks likely to be lengthy, please register the issue under “elements for further discussion”. Explain to the participants that their issue will be addressed during another session or one-on-one with a facilitator.

**Task 2. Identify main stakeholders for implementing and enforcing legislation to comprehensively ban TAPS**

(45 minutes)

1. Direct the group discussion to identify organizations and individuals that are important. Ensure that participants do not just name all the organizations involved in tobacco control, but make sure that they know those that are making, or should be making, a contribution to the implementation and enforcement of bans on TAPS.
2. Ask participants about the scope of power/responsibility or/and area of expertise of these organizations/individuals.
3. Discuss the current or planned involvement and contribution of these organizations and individuals.
4. Assess the quality of the working relationship using a scale of 1 (low) to 5 (high), for example.
### Stakeholders

**Organization/sector/individuals**
e.g. ....

**Scope of power or responsibility and area of expertise**
Power/responsibility
e.g. ....

**Stage of current involvement and specific activities**
e.g. ...

**Working relationship**
e.g. ....

| Government, NGO, civil society organization, private sector, other | • Direct legal power  
• Inspection/reporting  
• Enforce/fines  
• Indirect legal power (citizen’s rights)  
• Raise awareness among media and public opinion  
• Report/complain  
• Scientific authority  

Expertise/Knowledge
e.g. ....  
• Scientific (monitoring/auditing)  
• Law enforcement  
• Health (clinical or policy)  
• Communications, advocacy  
• Education and training  
• Labour relations (unions etc.)  
• Corporate (tourism, hospitality)  

| • Not yet engaged  
• Early stage of involvement and discussions  
• Some early activities/wins  
• Fully engaged and comprehensively supportive  

Specific activities
e.g. ....  
NGO is involved in running a series of training and sensitization workshops |

| • Working well  
• Needs to be developed  
• Some early activities/wins  
• Issues/difficulties |

---

### Task 3. SWOT analysis (45 minutes)
Collect the participants’ spontaneous reactions to the question. Refer to Participants’ Workbook.

#### RECORDING FORMAT FOR FLIPCHART

<table>
<thead>
<tr>
<th>Strengths</th>
<th>Weaknesses</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Opportunities</th>
<th>Threats</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

### Plenary session (30 minutes)
Each small group should briefly (5 minutes or so) present the results of their discussions to the larger group.
SESSION 5

Enforcement

<table>
<thead>
<tr>
<th>Duration</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>30 minutes</td>
<td>Presentation P6 on “Effective enforcement of a comprehensive ban on “TAPS”, followed by discussion</td>
</tr>
<tr>
<td></td>
<td>Presentation 10 minutes</td>
</tr>
<tr>
<td></td>
<td>Questions and answers</td>
</tr>
<tr>
<td></td>
<td>Introduction to exercise</td>
</tr>
<tr>
<td>1 hour 30 minutes</td>
<td>Small group exercise: Enforcement</td>
</tr>
<tr>
<td>30 minutes</td>
<td>Plenary discussion: Enforcement</td>
</tr>
</tbody>
</table>

Estimated session time: 2 hours 30 minutes

GOALS AND EXPECTED OUTCOMES

- Understanding the needs, the obstacles and the best ways to develop an enforcement plan to address gaps identified in the current situation assessment.

MATERIALS AND DETAILED AGENDA

Refer to Participants’ Workbook.

Presentation P6: “Effective enforcement of a comprehensive ban on TAPS”.
Hand-outs: Article 13 Guidelines, paragraphs 58–74, highlights entities with responsibility to implement the ban (See Annex 2 in Participants’ Workbook).

In guiding participants through this exercise, keep in mind that countries can secure good compliance with a small team of enforcement officers supported by an effective information and communication plan.

If participants find it difficult to envisage enforcement mechanisms, ask them to think of examples of other legislation that is complied with in their country, such as that on seat belts or food safety, and how that compliance came about.

Plenary session (30 minutes)
Each small group should briefly (5 minutes or so) present the results of their discussions to the larger group.
GOALS AND EXPECTED OUTCOMES

• Participants will have a clear understanding of the legislative content needed in their jurisdiction to achieve best practice.
• Participants will have developed a preliminary plan of action for the development and adoption of improved legislation.
• Become familiar with existing or draft examples of legislation from the region which could be adapted for use in their jurisdiction.

MATERIALS

WHO FCTC Article 13 Guidelines (paragraphs 58–74). (See Annex 2 in Participants’ Workbook)

Practical framework for implementing legislation for comprehensive bans on tobacco advertising, promotion and sponsorship (TAPS) (see Annex 5 in Participants’ Workbook)

Excerpts from various legislations/regulations on banning tobacco advertising, promotion and sponsorship (TAPS) (See Annex 6 in Participants’ Workbook)

DETAILED AGENDA

Refer to Participants’ Workbook

SESSION 6

Legislative development

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>3 hour 30 minutes</td>
<td>Small group exercise: Legislative development strategy</td>
</tr>
<tr>
<td>30 minutes</td>
<td>Plenary reports from small groups</td>
</tr>
<tr>
<td></td>
<td>Estimated session time: 4 hours</td>
</tr>
</tbody>
</table>

GOALS AND EXPECTED OUTCOMES

• To identify the importance of information and communication in mobilizing support from stakeholders and increasing compliance among responsible entities.
• To develop an information and communication plan as part of the overall action plan for the country.

SESSION 7

Information and communication

<table>
<thead>
<tr>
<th>Time</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 hour</td>
<td>Presentation P7 on “Communicating to stakeholders: lessons learnt from other countries” Introduction to exercise</td>
</tr>
<tr>
<td>2 hour</td>
<td>Small group exercise</td>
</tr>
<tr>
<td>30 minutes</td>
<td>Plenary discussion</td>
</tr>
<tr>
<td></td>
<td>Estimated session time: 3 hours 30 minutes</td>
</tr>
</tbody>
</table>

GOALS AND EXPECTED OUTCOMES

• To identify the importance of information and communication in mobilizing support from stakeholders and increasing compliance among responsible entities.
• To develop an information and communication plan as part of the overall action plan for the country.
MATERIALS AND DETAILED AGENDA

Refer to Participants’ Workbook.

Presentation P7: “Communicating to stakeholders: lessons learned from other countries”.

Using the information collected during the situation assessment exercise, focus the plan on the topics discussed in the situation assessment – mobilize and improve support for complying with comprehensive bans.

There could be several different responses under each task, depending on the audiences and goals identified for different components of the strategy (e.g. mobilize decision-makers versus enable enforcement).

Task 1. Define what you are trying to achieve. What are your goals? (20 minutes)

Examples:
• Move public opinion from thinking TAPS are harmless to understanding that they are a threat to population health and vulnerable groups, including young people, women and smokers trying to quit.
• Secure adoption of legislation.
• Explain why a comprehensive ban is far more effective than a partial ban.
• Counter tobacco industry misinformation that businesses, organizations and institutions will suffer if TAPS are banned.
• Explain the rationale for comprehensive legislation, be prescriptive about any constraints, and give information on penalties and date of entry into force.

Task 2. Identify audience(s). Who do you need to communicate with? (20 minutes)

Examples include:
– key decision-makers;
– key opinion leaders;
– key agencies that need to comply, such as media and entertainment (television, print, radio, and internet), advertising standards, professional bodies, tobacco retailers;
– key stakeholders (e.g. enforcement authorities, health professionals, NGOs and civil society);
– the public at large;
– others.

Task 3. Identify what issue/themes you need to communicate about (20 minutes)

Examples include:
– the effects of tobacco consumption on population health, and the rationale for banning TAPS;
– the existence of comprehensive bans, and how it will be implemented and enforced;
– efficient and effective measures to protect the population from exposure to TAPS;
– the role of the tobacco industry in public misinformation;
– countering tobacco industry opposition, myths and tactics;
– the benefits of ending TAPS (impact on prevalence, protection of young people and denormalizing tobacco use);
– others.

Task 4. Identify who will be the best placed to deliver the message (20 minutes)

Examples include:
– government (which ministries or agencies?);
– NGOs (which ones?);
– NGO-government alliances;
– others (professional bodies, consumer protection agencies, legal authorities, parent groups).
Task 5. Identify the relevant format in which the information/message should be delivered (20 minutes)
Examples include:
- government web sites, guidelines, brochures, factsheets;
- mass media/earned media;
- information sessions, briefings, seminars, workshops;
- internal communication channels;
- one-on-one communications.

<table>
<thead>
<tr>
<th>Problem/issue to be addressed</th>
<th>Target audience</th>
<th>Objectives</th>
<th>Messenger</th>
<th>Type of media/format</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Plenary session (30 minutes)
Each small group should briefly (around 5 minutes) present the results of their discussions to the larger group.

Presentation: summarize in bullets.

GOALS AND EXPECTED OUTCOMES

- To develop an evaluation and monitoring plan, including how to monitor creative innovations in industry tactics and media technology as well as how to involve civil society.

MATERIALS

Refer to chart in Participants’ Workbook.

Presentation P8 on “Evaluation and monitoring”.
Exercise: Refer to Participants’ Workbook for Tasks 1 and 2.

DETAILED AGENDA

Refer to Participants’ Workbook.
GOALS AND EXPECTED OUTCOMES

• Ensure that participants leave the training workshop with at least the core of a realistic action plan of their own design, an understanding of the next steps, and a commitment to implement an action plan.
• Facilitate specific commitments of action from participants to begin implementation of the plan so that the plan becomes more than “completed boxes on a piece of paper”.
• Provide a solid foundation of links to experts and resources that participants feel encouraged to draw on as they leave the workshop and implement their strategies.

MATERIALS AND DETAILED AGENDA

Exercise: Refer to Participants’ Workbook.
Materials: Workshop evaluation form

Workshop evaluation: Participants should be asked to spend a few minutes completing the overall workshop evaluation.

When participants have finished filling out the evaluation, the facilitator should close the workshop with expressions of thanks to those who have played a key role in organizing it (particularly administrative staff, who are often “unsung heroes”), and with acknowledgement of participation (possible certificates and/or humorous awards could be presented).

In addition, the facilitator should congratulate the participants on the work that they have done.

If participants and facilitators are not leaving immediately, it is nice to arrange a social gathering over a meal where participants can say goodbye socially, without having to think about the next workshop session.

THE END! of the workshop.

SESSION 9

Consolidation and wrap-up

| Exercise to pull together previous exercise results and to identify: | 1 hour 30 minutes |
| - priorities | |
| - next steps [may include further follow-up with legislative process] | |
| - resources needed [resources defined broadly: materials, money, people]. | |

| Wrap-up session: | 30 minutes |
| - thanks | |
| - certificates, if desired. | |

Estimated session time: 2 hours
KEY RESOURCES

Key policy resources (high-level overviews, summaries, policy papers)

- WHO FCTC Implementation Database

Article 21 of the WHO FCTC calls upon Parties to submit to the Conference of the Parties periodic reports on implementation of the Convention. The WHO FCTC Implementation Database contains and provides access to information from the reports submitted by the Parties to the Convention. The database can be searched by individual Parties and by treaty articles and measures. When searching for full reports by Parties, please note that the searchable list contains all Parties that have reported at least once. Within treaty articles, searches can be carried out by individual measures and/or questions of the reporting instrument. It should be noted that some questions are specific to either the two-year or five-year reports. The article overview table, accessible by clicking on the respective article names, contains only the latest available information from Parties. The database is updated regularly as reports arrive from the Parties. The WHO FCTC Implementation Database can be accessed at: http://apps.who.int/fctc/reporting/database/

The reports and their annexes, submitted by the Parties on their implementation of the Convention can be accessed on the website of the Convention Secretariat at: http://www.who.int/fctc/reporting/party_reports

Session 1
- Summary of evidence
  The impact of tobacco marketing on tobacco consumption and the effectiveness of comprehensive bans. Findings of the monograph on the role of the media in promoting and reducing tobacco use, at: http://cancercontrol.cancer.gov/fcrb/monographs/19/index.html
  - Training workshop checklist of types of tobacco advertising, promotion and sponsorship (TAPS) (Annex 4 in Participants’ Workbook)

Session 2

Session 4
- Practical framework for implementing legislation for comprehensive bans on tobacco advertising, promotion and sponsorship (TAPS) [See Annex 5 in Participants’ Workbook]
- Excerpts from various legislation/regulations on banning tobacco advertising, promotion and sponsorship (TAPS) [Annex 6 in Participants’ Workbook]
- Training workshop checklist of types of tobacco advertising, promotion and sponsorship (TAPS) [Annex 4 in Participants’ Workbook]

Session 5

Session 6
- Practical framework for implementing legislation for comprehensive bans on tobacco advertising, promotion and sponsorship (TAPS) [Annex 5 in Participants’ Workbook]
- Excerpts from various legislation/regulations on banning tobacco advertising, promotion and sponsorship (TAPS) [Annex 6 in Participants’ Workbook]
Session 7

- Advocacy planning

- Communications and media advocacy

Session 8


ANNEXES

ANNEX 1

Needs Assessment Checklist
To make the most of the training programme, it's important to complete an assessment of your country's current needs. This assessment forms the basis for the first discussions with the facilitators to determine the most suitable components of the training package.

Activities to consider when doing a needs assessment:
- consult with stakeholders both inside and outside the organisation
- consult with consumers e.g. through surveys, focus groups
- review relevant journals and publications
- research relevant health statistics and demographic data
- review and learn from previous tobacco control programmes
- review relevant government reports and policies

One simple way of producing a needs assessment is to form a focus group of key people with a leading person asking several questions and another recording the answers for a period of around 60 to 90 minutes. Some suggested questions are:

1. Who are the most relevant stakeholders in government and/or non-governmental organisations who would benefit from attending the training programme?

2. What are our needs that we expect this training to help us with?

3. What key information do we have that will provide important input into the training process (such as latest or proposed draft legislation, any previous or pending legal challenges to TC legislation, any action plans/reports on successes and challenges in tobacco control, what specific projects have been funded in the last five years and what has been the outcome, examples of tobacco industry tactics and loopholes in laws etc., any specific enforcement problems, who are the major opponents of better legislation and enforcement)?

4. What relevant information have we gathered and analysed from staff members and other stakeholders?

5. Can we identify health and demographic data to better inform us and our faculty about the scope of the issue?

6. Have we collected information from consumers and other people affected by TAPS?

7. Can we distribute the needs assessment to others for further comment?

8. What are we expecting to get out of this training programme?
Workshop Participant Evaluation

Name of workshop: ________________________________

Day, month, year: ________________________________

City, country: ________________________________

Your feedback is very important to us. It is extremely helpful for us in our work to further develop and improve the training workshop.

Please take a few minutes to answer the questions below, and deposit the completed evaluation sheet in the evaluation box.

Date: ________________ Name (optional): ________________________________

Country: ________________________________

1. **How likely is it that you can put the lessons learned during this training workshop into practice?** [circle one]
   - Very likely
   - Likely
   - Somewhat likely
   - Not likely

2. **List three key knowledge / skills / attitudes you have learned that you could put to practice when you go back to your organisation.**

   __________________________________________________________

   __________________________________________________________

   __________________________________________________________

3. **The workshop material was relevant and informative.** [circle one]
   - Strongly agree
   - Agree
   - Disagree
   - Strongly disagree

4. **How useful were the pre-readings and handouts?** [circle one]
   - Extremely useful
   - Useful
   - Somewhat useful
   - Not useful at all

5. **How useful were the case studies?** [circle one]
   - Extremely useful
   - Useful
   - Somewhat useful
   - Not useful at all
6. How would you rate the balance between presentations, discussions and exercises? [circle one]

   Excellent       Good       Fair       Poor

7. How would you rate the time allocated for knowledge presentations? [circle one]

   Sufficient     Somewhat sufficient     Somewhat insufficient     Insufficient

8. How would you rate the time allocated for group discussion, questions and answers? [circle one]

   Sufficient     Somewhat sufficient     Somewhat insufficient     Insufficient

9. How would you rate the time allocated for group work? [circle one]

   Sufficient     Somewhat sufficient     Somewhat insufficient     Insufficient

10. The general organisation promoted a good learning experience. [circle one]

    Strongly agree     Agree     Disagree     Strongly disagree

11. I would recommend this training to my colleagues. [circle one]

    Strongly agree     Agree     Disagree     Strongly disagree

12. If you feel that something that should have been covered was not, please indicate below.

    ____________________________________________
    ____________________________________________
    ____________________________________________

13. What would you shorten / eliminate from the current programme, if anything?

    ____________________________________________
    ____________________________________________
    ____________________________________________

14. Please write any comments you may have on how this training could be improved in the future.
    (please continue on other paper, if necessary)

    ____________________________________________
    ____________________________________________
    ____________________________________________
15. Please give any feedback you may have on specific sessions. (You can think in terms of the following criteria: relevance, facilitation, discussions, handling questions, session content, session organisation, presentations, visual aids and tools used, learning environment, allocation of time and pace of the session)

Session 1: Welcome, workshop expectations and issue overview

Session 2: Best practices in banning TAPS

Session 3: Countering opposition

Session 4: Strategic planning: Assessment of current situation: legislative and political environment

Session 5: Strategic planning: Enforcement

Session 6: Strategic planning: Legislative development
Workshop Participant Evaluation

Session 7: Strategic planning: Information and communication

Session 8: Strategic planning: Evaluation and monitoring

Session 9: Consolidation and wrap-up

16. Additional comments [please continue on other paper, if necessary]

17. The hotel accommodation, meals, transport arrangements and conference facilities were good.
   [circle one and write any comments you may have]
   Strongly agree       Agree       Disagree       Strongly disagree

18. My expectations were met. [circle one]
   [circle one and write any comments you may have]
   Strongly agree       Agree       Disagree       Strongly disagree

19. How would you rate the training workshop overall? [circle one]
   Excellent       Good       Fair       Poor

THANK YOU FOR YOUR TIME!
For further information, kindly contact **TFI** or **The Union** as follows:

<table>
<thead>
<tr>
<th><strong>Tobacco Free Initiative (TFI)</strong></th>
<th><strong>The Union</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>World Health Organization</td>
<td>68, Boulevard Saint-Michel</td>
</tr>
<tr>
<td>20, Avenue Appia</td>
<td>75006 Paris,</td>
</tr>
<tr>
<td>CH-1211 Geneva 27</td>
<td>France</td>
</tr>
<tr>
<td>Switzerland</td>
<td></td>
</tr>
<tr>
<td>Tel.: + 41 22 791 21 11</td>
<td>Tel.: + 33 1 44 32 03 60</td>
</tr>
<tr>
<td>Fax: + 41 22 791 48 32</td>
<td>Fax: + 33 1 43 29 90 83</td>
</tr>
<tr>
<td></td>
<td><a href="http://www.tobaccofreeunion.org">http://www.tobaccofreeunion.org</a></td>
</tr>
</tbody>
</table>