

Pan-Canadian Health Promoter Competencies' Toolkit – Product Example: Describe Implications of Policy Options (Competency 4.1)

Smoke-Free Movies: Analysis of Policy Recommendations

ISSUE

Regional Council has endorsed resolution (2013-714 – September 12, 2013) citing six policy and program recommendations to reduce youth exposure to tobacco imagery in movies. Public Health Unit must determine its role in advancing the policy recommendations through an evidence informed approach.

BACKGROUND

There is strong and growing evidence indicating that children and youth who are exposed to tobacco imagery in movies are more likely to initiate and progress to regular smoking.

Despite legislation and policy restrictions on tobacco marketing in entertainment media, tobacco imagery remains pervasive in both youth-rated and adult-rated movies.

The World Health Organization (WHO) recommends five policy actions to reduce the exposure of children and youth to smoking in movies

- Classify films with tobacco use as R-rated
- Require strong anti-smoking ads prior to movies depicting tobacco use
- Certify no payoffs
- Prohibit tobacco brand displays
- Make productions with smoking ineligible for public subsidy

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The Pan-Canadian Committee on Health Promoter Competencies gratefully acknowledges the funding support provided by the Public Health Agency of Canada. The views expressed herein do not necessarily represent the views of the Public Health Agency of Canada.



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Public Health Unit completed a rapid review in 2013 examining the effectiveness of interventions to reduce the impact of smoking in the movies on the smoking behaviours of youth. Based on recommendations from this review, Regional Council endorsed the following recommendations:

- That Public Health Unit support the implementation of the five policy recommendations from the World Health Organization and the Ontario Coalition for Smoke-Free Movies to reduce youth exposure to tobacco imagery in movies.
- That Public Health Unit develop and implement a strategy to increase knowledge among Region's parents and youth on the effects of child and youth exposure to tobacco imagery in movies.

Public Health Unit must now determine the most appropriate actions to take in advancing these six policy and program recommendations.

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CONTEXT

Evidence

The entertainment industry has a large impact on the attitudes and behaviours of young people³. Tobacco companies have long used movies as a platform for advertising⁴ using product placement and false imagery to establish the prototype of the rebellious smoker, which continues to attract adolescents to smoking today.³ Adolescents are the most frequent movie-goers. In 2010 in the US and Canada, adolescents aged 12 to 17 years saw an average of eight movies per year in theatres and those aged 18 to 24 years saw an average of seven movies per year.²

The 2012 U.S. Surgeon General's Report found that adolescents exposed to smoking in movies were 1.93 times more likely to smoke. Based on population studies conducted between 2003 to 2009, exposures to on-screen smoking accounts for 44% of new adolescent smokers in the U.S. It is also estimated that reducing in-theatre smoking imagery from the current level of 275 annual exposures in PG-13 movies per adolescent down to approximately 10 or less would reduce the prevalence of smoking by 18%.⁴

Action to Address the Issue

Internationally, country-specific responses have been taken in the United States, China, India, the United Kingdom, and Africa. Research on the impact of these intervention policies is required.²

In Canada, national and provincial level non-governmental organizations, often with participation from local health units, in Ontario, British Colombia, and Quebec have forwarded their endorsement to policy makers concerned with film classification and tax policy. They have also embarked on public opinion polling and public education campaigns to support policy change to reduce smoking in the movies.²

Governments and industries both have a role in limiting the amount of tobacco imagery in movies in Canada:

Federal Government

- Canada is a signing party of the WHO Framework Convention on Tobacco Control (FCTC). Parties to the WHO FCTC are required to implement a comprehensive ban on tobacco advertising, promotion, and sponsorship according to Article 13 of the treaty. This includes all media platforms.
- The majority of WHO smoke-free movies policy recommendations are addressed through the guidelines for implementation of FCTC Article 13, however the majority of recommendations must be implemented by the major motion picture companies in the United States.

- No federal political parties have a platform statement specific to smoke-free movies.
- The Tobacco Act does not address these policy recommendations.

Ontario Film Review Board (OFRB)

- The OFRB is an agency of the Ontario government and works closely with the Ministry of Consumer Services.
- The agency is responsible for assigning movie ratings in Ontario.
- Tobacco use is currently included as a content advisory, but is not a criterion when rating movies. The OFRB has the authority to add tobacco as a criterion to assign an R-rating to a movie.

Ministry of Health and Long-Term Care

- The Smoke-Free Ontario (SFO) Strategy falls within this ministry
- In 2010, the Tobacco Strategy Advisory Group provided recommendations to be implemented under the renewal of the SFO Strategy.⁶ The following recommendations are directly linked to smoke-free movies:
 - Introduce legislation to further restrict marketing via tobacco product packaging, tobacco product accessories, movies, and other forms of media
 - \circ $\;$ Assign adult ratings for movies and video games with tobacco imagery $\;$
 - Show anti-smoking ads before movies and video games that contain tobacco imagery
 - Counter the promotional impact of product placement in movies and video games aimed at young people using media and social marketing strategies
- No provincial political parties have a platform statement specific to smoke-free movies.

Movie Studios/Production Companies

- Almost all movie studios, cable channels, TV networks, or video chains are owned by six companies in the United States. The CEOs of these companies are primarily responsible for the movie content produced.
- Many of the major studios have organizational policies aimed at reducing smoking imagery in youth-rated movies (e.g., antismoking ads and certifying no payoffs). However, none of the studios have blanket policies against including smoking or other tobacco imagery in youth-rated films that they produce or distribute.
- Movie studios, which make up the Motion Picture Association of America, have the ability to assign an R-rating to movies that contain tobacco imagery. This would affect the amount of tobacco imagery in the majority of movies seen in Canada, as many studios would remove tobacco imagery in order to avoid receiving an R-rating.

Tobacco Industry

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- In the United States, where the majority of movies seen by Canadians are produced, the tobacco industry must follow provisions placed upon them under the Master Settlement Agreement (MSA). The provisions prohibit brand placement in movies and marketing strategies that target youth. However, the MSA does not apply to international subsidiaries or non-participating domestic companies, although the participating parties control the large majority of the domestic cigarette market. In addition, it is not clear whether the ban applies to brand placement only or all tobacco product placements.
- The tobacco industry is also required to report annual marketing and sales to the Federal Trade Commission in the United States. They claim to have not provided any form of compensation to have brand names or products appear in movies or television shows. However there are reports of "under-the-table" payments that are difficult to track.

Community Stakeholders

- An environmental scan was conducted by Public Health Unit to understand the role and actions of regional, provincial, and national stakeholders to address this issue.
- Below are key stakeholders that Public Health Unit should consider partnering with in order to address the policy recommendations:

Organization	Role/Function	Membership	Potential Strength of Partnership
Ontario Coalition for Smoke-Free Movies	 Formed in 2010 to take collective action on the issue of child and youth exposure to tobacco imagery in movies. Advocates for the five policy options recommended by the WHO Main focus has been on an R- rating for movies that contain tobacco imagery Public Health Unit is already an active member 	 Tobacco Control Area Networks (TCANs) Non-Smokers' Rights Association Smoking and Health Action Foundation Heart and Stroke Foundation Ontario Lung Association and Youth Advocacy Training Institute (YATI) The Ontario Tobacco Research Unit The Program Training and Consultation Centre-Media Network The Canadian Cancer Society 	 OCSFM is a key partner for Public Health Unit in order to engage in advocacy activities Public Health Unit is currently an active member within the coalition OCSFM is dedicated to the issue and is currently engaged in advocacy activities

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Tobacco Control Systems Workgroup	 Provincial workgroup that is part of the SFO Coordination structure Various task forces fall under this committee, including the Youth Prevention Task Force 	 ** (MOHLTC) ** (York PHU) ** (CAMH) ** (OMA) ** (OTRU) ** (Middlesex-London PHU) ** (Ontario Federation of Indian Friendship Centres ** (Ontario Lung Association) ** (Smoking and Health Action Foundation) ** (University of Waterloo) ** (University of Waterloo) ** (Heart and Stroke Foundation) ** (Heart and Stroke Foundation) ** (PHO) ** (Ontario Campaign for Action on Tobacco) ** (Canadian Cancer Society) ** (Office of the CMOH of Ontario) 	Work group has expressed interest in addressing this issue and has an Medical Officer of Health (**) that is known to be active in the area
Central East Tobacco Control Area Networks (TCANs)	 Networks of health units based on geographical location as part of the overall SFO Strategy Public Health Unit is the lead of the Smoke-Free Movies Working Group within the 	Public Health Units part of the CE TCAN	 CE TCAN has made SFM a priority area within their action plan Members have dedicated staff to participate in the SFM workgroup that is led by Public Health Unit

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	Central East TCAN		Public Health Unit will need to play a leadership role to guide this strategy within the CE TCAN
Region's School Boards	 The two school boards within Region provide an access point to both parents and youth School boards have older/out- dated policies on tobacco use; however smoking in the movies is not currently addressed in the policies Current interest in the issue among some secondary schools, particularly those who have received Tobacco High School Grants 	 School Board A School Board B 	 SFM does not appear to be a priority issue within the school boards Select individual schools have engaged in youth awareness raising activities related to SFM Opportunity to capitalize on current policies in schools related to youth tobacco prevention
Region's Parenting Groups	Parenting groups (e.g., Ontario Early Years Centres) provide a venue to increase knowledge of the issue among parents of young children	• N/A	 Parenting groups are not known to be active in this issue Public Health Unit will need to raise knowledge of the issue in order to engage parenting groups to take action on the issue
Academics/Researchers	 Questions related to smoke- free movies have been added to the Ontario Student Drug Use and Health Survey (OSDUHS) and the Centre for Addiction and Mental Health (CAMH) Monitor. Public Health Unit must keep abreast of research being done in this area and perhaps 	• N/A	 SFM is an emerging issue among researchers, which is evident in the questions related to SFM that are being added to monitoring surveys Public Health Unit will need to be active in engaging researchers to conduct further work in this area

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partner with academics to conduct further research on the effectiveness of the	
proposed policy interventions	

RELEVANCE TO PUBLIC HEALTH UNIT

The five policies recommended by the WHO are addressed at the federal and provincial levels of government and are largely influenced by six movie studios in the US. Although Public Health Unit does not have regulatory authority of the policy recommendations, it is within the role of a local health unit to advocate for policies that will reduce the impact of smoking in the movies on the smoking behaviours of youth. Public Health Unit can also implement strong anti-smoking ads in regional theatres and implement a rigorous evaluation of outcomes in order to contribute to the knowledge base.

It is also within Public Health Unit's scope to develop and implement a strategy to increase knowledge among Region's parents and youth on the effect of child and youth exposure to tobacco imagery in movies.

Based on a consideration of the interests and institutions involved, the following is a description of the regulatory bodies that have the greatest influence over each policy recommendation and the proposed actions for Public Health Unit to address each recommendation.

Policy Recommendation Endorsed by Council	Who's (Potential) Role to Regulate	Proposed Actions for Public Health Unit
Classify films with tobacco use as R-rated	 Ontario Film Review Board Federal government - Obligation under WHO Framework Convention on Tobacco Control Article 13 Movie studios in the U.S. have a large influence on this policy 	Through the OCSFM, advocate to the Ontario Film Review Board to add tobacco as a criterion to assign an R-rating

Require all distribution channels to show a strong anti-smoking ad prior to movies depicting tobacco use	 Federal government - Obligation under WHO Framework Convention on Tobacco Control Article 13 Movie studios in the U.S. have a large influence on this policy 	 Develop strong anti-smoking ads to play in regional theatres Through the OCSFM, advocate to the federal government to meet obligations under FCTC Article 13 Through the OCSFM, advocate to the Ministry of Health and Long Term Care to adopt this recommendation from the 2010 Tobacco Strategy Advisory Group
Certify no payment for displaying tobacco	Federal government - Obligation under WHO Framework Convention on Tobacco Control Article 13	Through the OCSFM, advocate to the federal government to meet obligations under FCTC Article 13
Prohibit tobacco brand displays	 Federal government - Obligation under WHO Framework Convention on Tobacco Control Article 13 Movie studios in the U.S. have a large influence on this policy 	 Through the OCSFM, advocate to the federal government Through the OCSFM advocate to the federal government to meet obligations under FCTC Article 13
Make youth-rated films that show tobacco imagery ineligible for government film subsidies	Federal and provincial (Ministry of Finance) governments offer film subsidy programs for film productions made in Canada	Through the OCSFM, advocate to the federal and provincial governments to make films that include tobacco imagery ineligible for subsidies
Increase knowledge among Region's parents and youth on the efforts of child and youth exposure to tobacco imagery in movies	 School boards to implement polices that limit the amount of exposure to tobacco imagery in schools (e.g., movies shown in the classroom) 	 Partner with Region's school boards to develop policies to limit exposure to tobacco imagery in schools Collaborate with Central East TCAN to develop and implement a strategy to raise knowledge among parents and youth at the regional level Collaborate with OCSFM to develop and implement a provincial-wide strategy to raise knowledge of the issue

Refer to Appendix A for a complete analysis of the six policy and program recommendations.

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RECOMMENDATIONS

It is recommended that Public Health Unit:

- Continue as an active member on the OCSFM in order to advocate at the provincial and federal levels for implementation of the five policies recommended by the WHO.
- Lead the Central East TCAN working group to develop, implement, and evaluate a strategy to increase knowledge among Region's parents and youth on the effect of child and youth exposure to tobacco imagery in movies
- Partner with school boards and parents to develop policies that reduce the amount of youth exposure to tobacco imagery in schools
- Develop and evaluate strong anti-smoking ads to air prior to movies that contain tobacco imagery in regional theatres

References

- 1) Peel Public Health (2012). Interventions to reduce the impact of smoking in the movies on the smoking behaviours of youth: A rapid review. Mississauga, ON.
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- National Cancer Institute (2008). The Role of the Media in Promoting and Reducing Tobacco Use. Tobacco Control Monograph No. 19. Bethesda, MD: U.S. Department of Health and Human Services, National Institutes of Health, National Cancer Institute. NIH Pub. No. 07-6242.
- 4) U.S. Department of Health and Human Services (2012). Preventing tobacco use among youth and young adults: A report of the Surgeon General. Atlanta, GA: U.S. Department of Health and Human Services, Centres for Disease Control and Prevention, National Centre for Chronic Disease and Health Promotion, Office of Smoking and Health.
- 5) U.S. Department of Health and Human Services (2014). 2014 Surgeon General's report: The health consequences of smoking 50 years of progress. Atlanta, GA: U.S. Department of Health and Human Services, Centres for Disease Control and Prevention, National Centre for Chronic Disease and Health Promotion, Office of Smoking and Health.
- 6) Tobacco Strategy Advisory Group (2010). Building on our gains, taking action now: Ontario's tobacco control strategy for 2011-2016. Toronto, ON: Ministry of Health Promotion and Sport.

Policy Options

Below is an analysis of the policy and program recommendations endorsed by Regional Council:

Policy Recommendation 1: Classify films with tobacco use as R-rated					
Effectiveness	Potential Unintended Effects	Equity	Cost	Feasibility	Acceptability
 Dose-response relationship between exposure to on- screen smoking and youth smoking initiation² Most youth exposure to on-screen smoking comes from smoking incidents in youth-rated films² Public Health Unit completed a Rapid Review that found high quality evidence that an R- rating for movies with smoking could reduce the risk of children and adolescents starting to smoke¹ Movie studios would likely remove tobacco imagery rather than receive an R-rating. R-rated movies make less money than PG-13 rated movies 	 Rating change would not prevent youth from downloading R- rated movies or playing video games that contain tobacco imagery The use of e- cigarettes must be included in this policy. If not, the use of e-cigarettes in movies may increase dramatically, as has already started to happen 	Policy is most effective for those who attend movies in theatres or purchase movies, rather than those who download from home	 No additional cost to the OFRB to implement this policy, as the policy does not suggest re-rating old movies 	 Likely simple for the OFRB to add tobacco imagery as a criteria when rating movies 	 Parents and the general public will likely be supportive. The movie industry may argue that this interferes with their creative expression. Youth may feel that this is an intrusive policy that takes away their choice of what to watch

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Effectiveness	Potential Unintended Effects	Equity	Cost	Feasibility	Acceptability
 Literature Review completed by Public Health Unit found moderate quality evidence that placing anti-smoking ads before movies depicting smoking reduces the persuasive effect movie smoking can have on the attitudes towards smoking and intentions to smoke of children, adolescents, and adults¹ Anti-smoking ads are particularly important because even if tobacco images are removed from youth-rated movies, many youth can easily access adult-rated movies 	 Important to have a process in place for who will develop the ads. It would be ineffective, and potentially harmfully, if tobacco companies developed the ads² 	Important that ads be culturally appropriate and targeted to specific audiences	 Need to determine who would be responsible for paying to develop the ads² 	 Rules for distribution and monitoring are needed² The ads should also be added to videos and other distribution channels such as cable, satellite, video-on-demand, and Internet downloads² Some ads have already been developed and have been selected for their potential applicability around the world. These include ads from the World Lung Foundation, American Legacy's "truth" campaign, and advertisements developed by the State of California² 	 Movie industry could be supportive as it provides them with an opportunity to demonstrate corporate social responsibility² Movie industry could also be opposed to the policy, as they would not want to give up ad-space Research has shown that anti- smoking ads do not lower audience opinion of the film² General public will likely not object, as they ads will not be intrusive to audiences Tobacco industry will likely oppose the policy

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	Policy Recommendation 3: Certify no pay-offs					
Effectiveness	Potential Unintended Effects	Equity	Cost	Feasibility	Acceptability	
 Policy would ensure that tobacco companies are not marketing their products through product placement in movies 	 Movie industry may stop including tobacco imagery in their movies in order to avoid the legal costs associated with certifying movies that do contain tobacco imagery 	• No issues identified	 Policy would not be a large additional cost for provincial/federa I governments, as it could be added to existing mechanisms (e.g., the Ontario Film Review Board) that are responsible for registering films, rating them, and approving them before local distribution Movie and/or tobacco industries would be responsible for the costs of legal advice for the actual certification, which would be longer and more technical than the notice required to be 	 It is often difficult to determine if there have been "under-the-table" deals between the movie and tobacco industries The responsibility of determining whether or not a film includes tobacco imagery and needs to be certified could be incorporated with existing mechanisms (e.g., OFRB) 	 Likely an acceptable policy among the general public, as it does not interfere with the movie Movie companies may dispute the policy due to the cost for legal advice to certify movies that contain tobacco imagery Tobacco industry will likely oppose the policy 	

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			shown on		
	Policy Reco	mmendation 4: Pro	screen	nd displays	
Effectiveness	Potential Unintended Effects	Equity	Cost	Feasibility	Acceptability
 Tobacco companies are prohibited to pay for their tobacco brands to appear in movies in the United States under the Master Settlement Agreement A policy that prohibits all tobacco brand displays would solve the problem of who is responsible for the tobacco brand displays, as the tobacco and movie industries both dispute being responsible² 	 Potential increase of tobacco imagery in other forms of media such as television shows and video games that are not covered under the prohibition 	 No issues identified, as the ban would apply to all movies 	Adequate enforcement resources would be required to implement this policy	 The current ban in the United States under the MSA only bans tobacco companies from paying studios to include their brands It is difficult to determine whether or not a form of payment was made This policy would be a straightforward ban on all tobacco imagery, and therefore would be simpler to enforce 	 Policy would likely be accepted among the general public Tobacco industry will likely oppose the policy
-	Recommendation 5	: Make production	s with smoking ine	eligible for public su	bsidy
Effectiveness	Potential Unintended Effects	Equity	Cost	Feasibility	Acceptability
Canada extends federal and provincial film production tax credits to attract	 British Colombia and Ontario grant the largest amount of subsidies in Canada. There 	 This policy may impact smaller, independent producers who may rely more 	This would be a low cost policy for the government to implement	 A clear definition of tobacco imagery required Amendments required to existing 	 Policy may be contested by regions that attract a large number of film producers and

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 American film producers Many of these films contain tobacco imagery in youth- rated movies Policy would encourage producers not to include tobacco imagery in their movies in order to qualify for a film subsidy 	may be economic consequences, particularly for these provinces, if film producers choose to film in jurisdictions that provide a subsidy and allow smoking imagery	on the subsidy than large studio companies		federal and provincial tax credit program specifications	are concerned about the economic impact this may have
Program Recom	mendation 6: Increase ex Potential Unintended Effects	se knowledge amou posure to tobacco Equity		-	e effects of youth Acceptability
A literature review completed by Public Health Unit found high quality evidence that parental restrictions on the viewing of R-rated movies	 Increased knowledge of the issue among parents and youth may lead to greater advocacy to the provincial and federal 	 Multi-faceted communication strategy must be designed to reach all target populations Important to reach parents 	 Costs associated with developing and implementing communication materials Staff time associated with 	 Resources in place for Public Health Unit to implement a strategy at the local and/or regional level along with the 	 Parents and the general public will likely be receptive towards the message, as it is based on individual choice rather than a population-level

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 have greater knowledge of the issue Parents will be more likely to work with school boards to implement policies to reduce youth exposure to tobacco imagery in schools if they have greater knowledge 	place restrictions on what their children watch	Health Unit can work with school boards to update their existing policies and add in components that address tobacco imagery in movies at the same time	 policies in schools School boards may be concerned if additional time is required to screen movies for tobacco imagery. However, several websites maintain a listing of tobacco imagery in box office movies.
greater knowledge of the issue		same time	

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