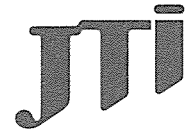
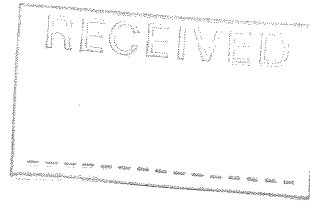


John Stribling  
New Zealand Ministry of Health  
133 Molesworth Street  
Thorndon  
Wellington 6011  
New Zealand



**By Courier**

06.01.2020

## **2019 JTI INGREDIENT SUBMISSION – NEW ZEALAND**

Dear Mr. Stribling,

JT International Germany GmbH ("**JTI**") lodges this submission as the relevant manufacturer and on behalf of Imperial Tobacco New Zealand Limited as the relevant importer pursuant to Smoke Free Environment Act 1990, Sect 35(1).

### **Ingredients data**

JTI hereby provides ingredients data for all tobacco products, by brand name, shipped by the manufacturers for sale in the territory of New Zealand during the period specified in the enclosure.

### **Tar, Nicotine and Carbon Monoxide (TNCO)**

JTI hereby submits manufacturing specifications-based data for TNCO yields values of cigarettes shipped by the manufacturers for sale in the territory of New Zealand during the period specified in the enclosure. The TNCO yields are verified in an ISO 17025 accredited laboratory<sup>1</sup>

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<sup>1</sup> *Tar, nicotine and carbon monoxide are verified by JT International Germany GmbH, Abrauchanalytik, Diedenhofener Str. 30, 54294 Trier, Germany.*

**JT International Germany GmbH**

Diedenhofener Straße 20-30

54294 Trier

T +49 (0)651 686 10

Aufsichtsratsvorsitzender: Marc Ruede

Geschäftsführer: Georgios Bletsas, Jon H. Moore, Stephan Schröder

Sitz der Gesellschaft: Trier, Registergericht Wittlich, Handelsregisternummer HRB 40577

Bankverbindung: Citibank, 0211814004, BLZ: 50210900, SWIFT: CITIDEFF, IBAN: DE22 5021 0900 0211 8140 04

**jti.com**

We request notification prior to a release of any data provided as part of this submission.

We welcome the opportunity to meet with you or your staff to discuss any points, which may arise. To facilitate communications in the first instance, please contact Steve Sze, SRA Regional Director Asia-Pacific, Phone: +85225859345; E-mail. [Steve.Sze@jti.com](mailto:Steve.Sze@jti.com).

Yours sincerely,



Jochen Gorges  
*SRA Reporting & Systems*  
*Principal Director*



Frank Schneider  
*Research & Development*  
*Packaging Development Support Center*  
*Vice President*

Encl.



## New Zealand Submission 2019\*

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\* Reporting period: 01.01.2019 – 31.12.2019

**SCHEDULE A**  
**CALENDAR YEAR 2019 – JT INTERNATIONAL**  
**CIGARETTE**

*Attached*



## **ADDITIVES LIST**

### **CIGARETTES**

#### **PARTICIPATING COMPANY CERTIFICATE IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2019**

I, Jochen Gorges, SRA Reporting & Systems Principal Director of JT International Germany GmbH, Diedenhofener Str. 30, D-54294 Trier, Germany (the "Company"), hereby certify in respect of the Company's attached product class list of additives that:

- (a) All additives which have been or will be used in tobacco in the Company's brands in the product class for sale in New Zealand have been listed.
- (b) The Company has not included in the list any additive which was not or will not be used in its brands in the product class for sale in New Zealand.
- (c) No additive has been or will be used in the product class in excess of the "Quantity not exceeded" as specified in the Company's list for that product class.

Dated at Trier, Germany this 07th day of January 2020

A handwritten signature in dark ink, appearing to read 'J. Gorges', written over a horizontal line.

*Jochen Gorges  
SRA Reporting & Systems  
Principal Director*

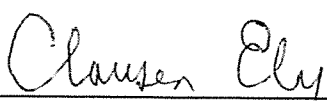

**ADDITIVES LIST  
CIGARETTES**

**LEGAL FIRM CERTIFICATE  
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2019**

The Law Firm of Covington & Burling LLP hereby certifies as follows:

1. The attached list of cigarettes additives has been compiled from cigarettes additive lists supplied by the Participating Companies.
2. The Participating Companies for the cigarettes additives list are:
  - a. British American Tobacco
  - b. Imperial Tobacco
  - c. JT International
3. All of the cigarettes additives listed by any Participating Company are shown on the attached list.
4. A copy of the certificate which accompanied the cigarettes additives list of each Participating Company is annexed to the attached cigarettes additives list.
5. In the attached cigarettes additives list, the "Quantity Not Exceeded" is the highest "Quantity Not Exceeded" shown by any Participating Company in its cigarettes additives list.

DATED this 9<sup>th</sup> day of January, 2020.

  
\_\_\_\_\_  
for Covington & Burling LLP 

## **CIGARETTES**

**Ingredients in Cigarettes produced by British American Tobacco, JTI,  
and Imperial Tobacco, and sold in New Zealand in 2019**

<b>Prefix</b>	<b>Component Name</b>	<b>QNE</b>
	Water	12.8000
	Sugars	3.6973
	Sugar, Invert	2.8593
	Glycerol	2.7319
	Propylene Glycol	1.7708
L-	Menthol	1.3000
	Licorice Extract, Fluid	1.2558
	Menthol	0.9464
	Calcium Carbonate	0.8276
	Cellulose	0.5173
	Cocoa Powder	0.5117
	Cocoa Extract, Mass, Shells, Powder	0.4993
	Licorice Extract, Root Extract, Powder	0.3569
	Carob Bean Extract, Powder, Oleoresin	0.2593
	Plum Extract, Juice, Concentrate	0.2156
	Carob Bean Extract	0.0511
	Fenugreek Extract, Oil, Oleoresin	0.0250
	Molasses, Molasses Extract, Essence	0.0250
	Apricot Extract	0.0100
	Balsam Oil, Peru	0.0100
	Cocoa Extract	0.0100
	Corn Syrup,High Fructose	0.0100
	Ethyl Butyrate	0.0100
	Fenugreek Extract	0.0100
	Fig Extract	0.0100

	Guava Extract	0.0100
	Maltol	0.0100
Para-	Methoxy Benzaldehyde	0.0100
	Phenyl Carbinol	0.0100
	Piperonal	0.0100
	Poly-Dimethyl Siloxane Emulsion	0.0100
	Prune Extract	0.0100
	Raisin Extract, Juice, Concentrate	0.0100
	Vanillin	0.0100
	2,3,5,6-Tetramethylpyrazine	0.0010
	Balsam Peru Oil, Resinoid, Oleoresin	0.0010
	Benzoin Gum Sumatra	0.0010
	Benzyl Carbinol	0.0010
	Caramel	0.0010
	Caramel And/Or Caramel Color	0.0010
	Coffee Extract	0.0010
	Coriander Seed Oil	0.0010
	Delta-Decalactone	0.0010
	Ethyl Maltol	0.0010
	Ethyl Phenylacetate	0.0010
	Ethyl Vanillin	0.0010
	Eucalyptol	0.0010
	Isoamyl Acetate	0.0010
	Isoamyl Isovalerate	0.0010
	Isovaleric Acid	0.0010
	Methyl Salicylate	0.0010
	Methylcyclopentenolone	0.0010
	Nutmeg Oil	0.0010
	Phenethyl Phenylacetate	0.0010



	Phenylcarbinol	0.0010
	Spearmint Oil	0.0010
	Vanilla Extract	0.0010
	Vanilla Extract And/Or Oleoresin	0.0010
	2,3,5-Trimethylpyrazine	0.0001
	2,5-Dimethylpyrazine	0.0001
	2-Acetylpyrazine	0.0001
	2-Tridecanone	0.0001
	3,7-Dimethyl-6-Octenoic Acid	0.0001
	4-(2,6,6-Trimethylcyclohex-1-Enyl)But-2-En-4-One (Beta-Damascone)	0.0001
	4-(2,6,6-Trimethylcyclohexa-1,3-Dienyl)But-2-En-4-One (Beta-Damascenone)	0.0001
	4,5-Dimethyl-3-Hydroxy-2,5-Dihydrofuranone	0.0001
	4-Methylacetophenone	0.0001
	5-Ethyl-3-Hydroxy-4-Methyl-2(5H)-Furanone	0.0001
	Acetanisole	0.0001
	Amyl Butyrate	0.0001
	Benzaldehyde	0.0001
	Benzoin Resinoid And/Or Resin Extract	0.0001
	Benzyl Benzoate	0.0001
	Beta-Ionone	0.0001
	Butyric Acid	0.0001
	Cardamom Seed Oil	0.0001
	Cassia Bark Oil	0.0001
	Celery, Celery Seed Extract And/Or Oil	0.0001
	Citric Acid	0.0001
	Clary Sage Oil	0.0001
	Coriander Extract And/Or Oil	0.0001
	Davana Oil	0.0001

Delta-	Decalactone	0.0001
	Decanoic Acid	0.0001
	Ethyl 10-Undecenoate	0.0001
	Ethyl 2-Methylbutyrate	0.0001
	Ethyl Acetate	0.0001
	Ethyl Hexanoate	0.0001
	Ethyl Isovalerate	0.0001
	Ethyl Lactate	0.0001
	Ethyl Oenanthate	0.0001
	Ethyl Palmitate	0.0001
	Ethyl Propionate	0.0001
	Gamma-Decalactone	0.0001
	Gamma-Nonalactone	0.0001
	Gentian Root Extract	0.0001
	Geraniol	0.0001
	Ginger Oil	0.0001
	Guaiacol	0.0001
	Hexanoic Acid	0.0001
	Hexyl Acetate	0.0001
Alpha-	Irone	0.0001
	Isoamyl Phenylacetate	0.0001
	Jasmine Absolute	0.0001
	Labdanum Extract, Oil, Oleoresin	0.0001
	Linalyl Acetate	0.0001
	Lovage Extract And/Or Oil	0.0001
	Mace Oil	0.0001
	Methyl 2-Pyrrolyl Ketone	0.0001
	Methyl Cyclopentenolone	0.0001
	Orange Oil, Sweet, Terpeneless	0.0001

	Palmitic Acid	0.0001
	Peppermint Oil	0.0001
	Phenylacetic Acid	0.0001
	Propenylguaethol	0.0001
	Propyl Acetate	0.0001
	Rose Extract And/Or Oil	0.0001
	Sugar Cane Extract	0.0001
	Tea Extract And/Or Powder	0.0001
	Tomato Extract	0.0001
	Trans-Anethole	0.0001
Gamma-	Undecalactone	0.0001
	Veratraldehyde	0.0001
	Vetiver Oil	0.0001
	Carbon Dioxide	0.0000
	Nitrogen	0.0000
	Ethyl Alcohol	-



## FORM OF RETURN

Manufacturer/Importer: JT International Germany GmbH ('the Company')  
Diedenhofener Strasse 30  
54294 Trier  
Germany

Calendar Year: 2019 12 months to 31 December 2019

Tobacco Product Class: Cigarettes

This Return has been made in respect of all products sold by the Company in the product class in the market of New Zealand. The products listed were manufactured by JT International Germany GmbH and imported by Imperial Tobacco New Zealand Limited.

a) Tobacco Weight by Product Class (including additives and moisture): 703 kg

b) Weight of Additives in Total by Product Class (excluding water): 36 kg

c) List of additives and quantities not exceeded for each brand and brand variant in this return:

See attached Schedule A.

It is declared that:

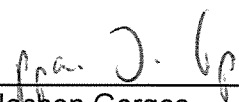
- i. All additives used in tobacco in the brands and brand variants in the Calendar Year have been listed in Schedule A.
- ii. No additive has been named for inclusion in Schedule A unless that additive was used in such tobacco products.
- iii. No additive was used in the Company's brands and brand variants in excess of the 'Quantity not exceeded' as specified in Schedule A.

d) Brand information: See attached Schedule B

I, Jochen Gorges, Germany, SRA Reporting & Systems Principal Director, hereby certify that the information contained in and annexed to this Return is correct for the purpose of the Smoke-free Environments Regulations 1999, subject to the qualifications stated.

This information is provided in confidence and may not be communicated to others.

DATED at Trier, Germany this 07<sup>th</sup> day of January 2020.

  
\_\_\_\_\_  
Jochen Gorges  
SRA Reporting & Systems  
Principal Director



**SCHEDULE 6**  
**FORM OF REPORT**

**Manufacturer/ Importer:** JT International Germany GmbH  
 („the Company“)  
 Diedenhofener Str. 30  
 D-54294 Trier  
 Germany

**Laboratory:** JT International Germany GmbH  
 Quality Assurance


**Calendar Year: 2019** 12 months to 31 December 2019

**Product:** Cigarettes

Brand and brand variant	Tar (mg/ cig.)	Nicotine (mg/ cig.)	CO (mg/ cig.)
Camel Filter 84 (20) (Domestic)	10	0.8	10

I, Jochen Gorges, of Diedenhofener Straße 30, 54294 Trier, Germany, SRA Reporting & Systems Principal Director of JT International Germany GmbH, certify that the report correctly records the results of all tests carried out at the laboratory at JT International Germany GmbH by or on behalf of JT International S.A. during the year 2018 for the purposes of Section 33 of the Smoke-free Environments Act 1990.

Dated at Trier, Germany, this 8th day of January 2020.

  
Jochen Gorges  
SRA Reporting & Systems  
Principal Director

**JT International Germany GmbH**  
Diedenhofener Straße 20-30  
54294 Trier  
T +49 (0)651 686 10

Aufsichtsratsvorsitzender: Marc Ruede  
Geschäftsführer: Georgios Bletsas, Jon H. Moore, Stephan Schröder  
Sitz der Gesellschaft: Trier, Registergericht Wittlich, Handelsregisternummer HRB 40577  
Bankverbindung: Citibank, 0211814004, BLZ: 50210900, SWIFT: CITIDEFF, IBAN: DE22 5021 0900 0211 8140 04

**jti.com**



## SCHEDULE B

### CALENDAR YEAR 2019 – JT INTERNATIONAL

Brand and brand variant including pack size	Quantity released for sale	Recommended Retail Price per pack (for cigarettes); per kg (for cigarette tobacco)
Camel Filter 84 (20) (Domestic)	1.09 Million cigarettes	\$32 NZD