

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



**By Courier**

03.01.2019

## **2018 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, Diederhofener Str. 30, 54294 Trier, Germany.*

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*  
*Vice President*



Coen van der Poel  
*Research & Development*  
*Product Development Support Center*  
*Vice President*

Encl.



# New Zealand Submission 2018\*

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\* Reporting period: 01.01.2018 – 31.12.2018

**SCHEDULE A**  
**CALENDAR YEAR 2018 – JT INTERNATIONAL**  
**CIGARETTE**

*Attached*



**ADDITIVES LIST**

**CIGARETTES**

**PARTICIPATING COMPANY CERTIFICATE  
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2018**

I, Jochen Gorges, SRA Reporting & Systems Vice President 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 03rd day of January 2019

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

*Jochen Gorges  
SRA Reporting & Systems  
Vice President*

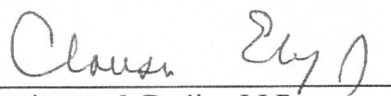
**ADDITIVES LIST  
CIGARETTES**

**LEGAL FIRM CERTIFICATE  
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2018**

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 15<sup>Th</sup> day of January, 2019.

  
for Covington & Burling LLP

## **CIGARETTES**

### **Ingredients in Cigarettes produced by British American Tobacco, Imperial Tobacco, and JTI, and sold in New Zealand in 2018**

<b>Prefix</b>	<b>Component Name</b>	<b>Quantity Not Exceeded (%)</b>
	Water	12.8000
	Sugars/Sugar, Invert	3.6650
	Glycerol	2.0720
	Propylene Glycol	1.7712
L-	Menthol	0.9228
	Calcium Carbonate	0.5672
	Cocoa Extract, Mass, Shells, Powder	0.4985
	Cocoa Powder	0.4930
	Licorice Extract, Root Extract, Powder, Fluid	0.3563
	Cellulose	0.3545
	Carob Bean Extract, Powder, Oleoresin	0.2590
	Prune Extract and/or Plum Extract, Juice, Concentrate	0.2074
	Fenugreek Extract, Oil, Oleoresin	0.0250
	Molasses, Molasses Extract, Essence	0.0250
	Acetic Acid	0.0100
	Apricot Extract	0.0100
	Balsam Peru Oil, Resinoid, Oleoresin	0.0100
	Cocoa Extract	0.0100
	Ethyl Acetate	0.0100
	Ethyl Butyrate	0.0100
	Fig Extract	0.0100
	Guava Extract	0.0100
	Phenylcarbinol	0.0100
	Piperonal	0.0100
	Raisin Extract, Juice, Concentrate	0.0100

	Sugar Cane Syrup	0.0100
	Vanilla Extract and/or Oleoresin	0.0100
	Vanillin	0.0100
	Benzoin Gum Sumatra, Benzoin Resinoid and/or Resin Extract	0.0010
	Benzyl Carbinol	0.0010
n-	Butyric Acid	0.0010
	Cane Sugar Extract	0.0010
	Caramel and/or Caramel Color	0.0010
	Citral	0.0010
	Coffee Extract	0.0010
	Coriander Seed Oil and/or Extract	0.0010
delta-	Decalactone	0.0010
	Ethyl Hexanoate	0.0010
	Ethyl Maltol	0.0010
	Ethyl Phenylacetate	0.0010
	Ethyl Propionate	0.0010
	Ethyl Vanillin	0.0010
	Eucalyptol	0.0010
	Isoamyl Acetate	0.0010
	Isovaleric Acid	0.0010
	Maltol	0.0010
para-	Methoxy Benzaldehyde	0.0010
	Methyl Cyclopentenolone	0.0010
	Methyl Salicylate	0.0010
	Phenethyl Phenylacetate	0.0010
	Spearmint Oil	0.0010
2,3,5,6-	Tetramethylpyrazine	0.0010
	Valerian Root Oil	0.0010



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
	Acetanisole	0.0001
2-	Acetylpyrazine	0.0001
	Amyl Butyrate	0.0001
trans-	Anethole	0.0001
	Benzaldehyde	0.0001
	Benzyl Benzoate	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
	Davana Oil	0.0001
gamma-	Decalactone	0.0001
	Decanoic Acid	0.0001
4,5-	Dimethyl-3-Hydroxy-2,5-Dihydrofuranone	0.0001
3,7-	Dimethyl-6-Octenoic Acid	0.0001
2,5-	Dimethylpyrazine	0.0001
	Ethyl 10-Undecenoate	0.0001
	Ethyl 2-Methylbutyrate	0.0001
	Ethyl Isovalerate	0.0001
	Ethyl Lactate	0.0001
	Ethyl Oenanthate	0.0001
	Ethyl Palmitate	0.0001
	Ethyl Trans-2-Butenoate	0.0001
5-	Ethyl-3-Hydroxy-4-Methyl-2(5H)-Furanone	0.0001
	Gentian Root Extract	0.0001

	Geraniol	0.0001
	Ginger Oil	0.0001
	Guaiacol	0.0001
2-	Heptanone	0.0001
	Hexanoic Acid	0.0001
	Hexyl Acetate	0.0001
beta-	Ionone	0.0001
alpha-	Irone	0.0001
	Isoamyl Isovalerate	0.0001
	Isoamyl Phenylacetate	0.0001
	Isobutyric Acid	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
4-	Methylacetophenone	0.0001
gamma-	Nonalactone	0.0001
	Nutmeg Oil	0.0001
	Orange Oil, Distilled	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
	Tea Extract and/or Powder	0.0001
	Tomato Extract	0.0001

2-	Tridecanone	0.0001
2,3,5-	Trimethylpyrazine	0.0001
gamma-	Undecalactone	0.0001
	Veratraldehyde	0.0001
	Vetiver Oil	0.0001
	Carbon Dioxide	0.0000
	Ethyl Alcohol	0.0000
	Nitrogen	0.0000



## FORM OF RETURN

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

Calendar Year: 2018 12 months to 31 December 2018

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): 1650.6 kg

b) Weight of Additives in Total by Product Class (excluding water): 75.41 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 Vice President, 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 16<sup>th</sup> day of January 2018.

  
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Jochen Gorges  
SRA Reporting & Systems  
Vice President



**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: 2018** 12 months to 31 December 2018

**Product:** Cigarettes

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

I, Jean Dupont, of Diedenhofener Straße 30, 54294 Trier, Germany, Quality Assurance Vice President 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 16<sup>th</sup> day of January 2019.

  
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Jean Dupont  
Quality Assurance  
Vice President

SCHEDULE B



CALENDAR YEAR 2018 – JT INTERNATIONAL

<b>Brand and brand variant including pack size</b>	<b>Quantity released for sale</b>	<b>Recommended Retail Price per pack (for cigarettes); per kg (for cigarette tobacco)</b>
Camel Filter 84 (20) (Domestic)	2.48 Million cigarettes	\$26.5 NZD
Camel Filter 84 (20) (Duty Free)	0.07 Million cigarettes	\$16 NZD