



Thilo Paschke

Vice President
Scientific & Regulatory Affairs

DIRECTOR-GENERAL OF HEALTH
NEW ZEALAND MINISTRY OF HEALTH
Martin Doyle
PO Box 5013
Wellington
NEW ZEALAND

Geneva, January 4th, 2010

Dear Mr. Doyle,

Enclosed please find a return provided on behalf of JT International S.A. ('JTI') in regard to the Smoke-free Environments Regulations 1999. The products listed were either manufactured and imported by JTI or imported by Imperial Tobacco New Zealand Limited. Please note that the information contained in the enclosed return has been provided in confidence and may not be communicated to others.

Please feel free to contact me directly at +41 22 7030529 if there are any questions.

Best regards,

A handwritten signature in black ink that reads 'Thilo Paschke'. The signature is written in a cursive style with a horizontal line underneath the name.

Thilo Paschke, Ph.D.

Enclosure

New Zealand 2009

SCHEDULE A
CALENDAR YEAR 2009 – JT INTERNATIONAL S.A.
CIGARETTES

Attached

**SCHEDULE 6
FORM OF REPORT
New Zealand**

Manufacturer/ Importer: JT International S.A. („the Company“)
1, Rue de la Gabelle
CH-1211 Geneva 26
SWITZERLAND

Laboratory: JT International Germany GmbH
Quality Assurance

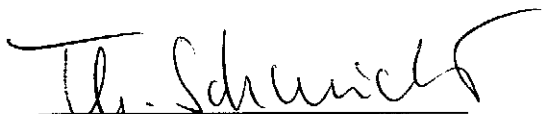
Calendar Year: 2009 12 months to 31 December 2009

Product: Cigarettes

Brand and brand variant	Tar (mg/ cig.)	Nicotine (mg/ cig.)	CO (mg/ cig.)
Camel Filters	10	0.8	10

I, Thomas Schmidt, of JT International Germany GmbH, Diedenhofener Straße 30, 54294 Trier, GERMANY, Quality Assurance Global Lab Director, 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 2009 for the purposes of Section 33 of the Smoke-free Environments Act 1990.

Dated at Trier, Germany, this 6th day of January 2010.



 Thomas Schmidt
 Quality Assurance Global Lab Director

JT International Germany GmbH

A member of the JTI Group of Companies

Anschrift: Diedenhofener Str. 30 · 54294 Trier · Telefon: +49 651 686 10 · Telefax: +49 651 686 181 0

Aufsichtsratsvorsitzender: Hans Georg Bornheim

Geschäftsführer: Birgitta Landen, Jürgen Rademacher, Robert Stanworth

Sitz der Gesellschaft: Trier · Registergericht Wittlich · Handelsregister Nr. HRB 40577

Bankverbindung: Citibank, 0211 814004, BLZ: 502 10900, Swift: CITIDEFF, IBAN: DE22 5021 0900 0211 8140 04



FORM OF RETURN

Manufacturer/Importer: JT International S.A. ('the Company')
1, Rue de la Gabelle
CH-1211 Geneva 26
Switzerland

Calendar Year: 2009 12 months to 31 December 2009

Tobacco Product Class: Cigarettes

This Return has been made in respect of all products sold by the Company in the product class in New Zealand. The products listed were either manufactured and imported by JTI or imported by Imperial Tobacco New Zealand Limited.

- a) Tobacco Weight by Product Class (including additives and moisture): 2961,7 kg
- b) Weight of Additives in Total by Product Class (excluding water): 157,1 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, Dr. Thilo Paschke of Geneva, Switzerland, Vice President of Scientific & Regulatory Affairs for JT International S.A., 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 Geneva, Switzerland this 19th day of January 2010


Thilo Paschke, Ph.D.

CIGARETTES**Ingredients in Cigarettes produced by British American Tobacco, Imperial Tobacco, and JT International and sold in New Zealand in 2009**

Prefix	Component Name	Quantity Not Exceeded (%)
	Water	12.8000
	Sugars (invert, white, brown, corn syrup, sucrose and/or sucrose syrup)	3.8255
	Propylene glycol	2.7284
	Glycerol	2.0999
	Licorice (Licorice Extract, Root Extract, Powder Extract)	1.2817
	Cellulose (Cellulose fibre)	0.8002
	Cocoa powder	0.7552
	Cocoa (extract, shell extract, distillate, and powder)	0.6184
	Honey	0.5980
l-	Menthol	0.5730
	Guar gum	0.3896
	Calcium carbonate	0.3460
	Carob bean extract (Carob, absolute, oleoresin, gum, powder)	0.2711
	Cocoa nibs	0.2170
	Plum juice and/or extract	0.2109
	Ethanol	0.1376
	Fig juice concentrate and/or extract	0.0500
	Molasses (extract, distillate, essence, tincture)	0.0500
	Raisin extract and/or concentrate	0.0500
	Sorbitol	0.0500
	Fenugreek extract, absolute, oleoresin, resin	0.0250
	Benzoin resinoid sumatra	0.0100
	Benzyl Alcohol	0.0100
	Coffee, coffee extract, oleoresin	0.0100
	Ethyl acetate	0.0100
	Ethyl butyrate	0.0100
	Ethyl maltol	0.0100
	Guava extract	0.0100
	Isoamyl acetate	0.0100
	Rum and/or rum extract	0.0100
	Tamarind extract	0.0100
	Vanillin	0.0100
	Acetoin	0.0010
	Balsam peru oil and/or resinoid	0.0010
	Benzaldehyde	0.0010
	Buchu leaf oil	0.0010
	Caramel	0.0010

	Cassia extract (fistula)	0.0010
3,7-	Clary sage oil	0.0010
	Coriander extract and/or oil	0.0010
beta-	Damascenone	0.0010
delta-	Decalactone	0.0010
	Ethyl isovalerate	0.0010
	Ethyl phenylacetate	0.0010
	Ethyl vanillin	0.0010
	Glucose	0.0010
gamma-	Hexalactone	0.0010
	Isoamyl isovalerate	0.0010
	Isopropyl acetate	0.0010
	Isovaleric acid	0.0010
2,3,5,6-	Mace oil	0.0010
	Maltol	0.0010
	Methyl cyclopentenolone	0.0010
2-	Methyl pyrazine	0.0010
gamma-	Nonalactone	0.0010
	Nutmeg powder and/or oil	0.0010
	Orange oil, distilled (sweet, terpeneless)	0.0010
	Phenethyl alcohol	0.0010
	Piperonal	0.0010
	Sodium citrate	0.0010
2,3,5,6-	Tetramethylpyrazine	0.0010
	Valerian root extract	0.0010
	Vanilla, vanilla beans, extract, oleoresin	0.0010
	Acetic acid	0.0001
2-	Acetylpyrazine	0.0001
	Ambroxide	0.0001
trans-	Anethole	0.0001
	Angelica root oil	0.0001
	Anise star oil	0.0001
	Apricot extract	0.0001
	Benzyl benzoate	0.0001
	Benzyl cinnamate	0.0001
n-	Butyric acid	0.0001
	Cardamom seed oil	0.0001
	Cassia Bark Oil	0.0001
delta-	Celery seed extract and/or oil	0.0001
	Cognac oil, green	0.0001
beta-	Damascone	0.0001
gamma-	Davana oil	0.0001
gamma-	Decalactone	0.0001
	Diacetyl	0.0001
2,5-	Dimethyl pyrazine	0.0001
3,7-	Dimethyl-6-octenoic acid	0.0001
	Ethyl heptanoate	0.0001
	Ethyl hexanoate	0.0001

ADDITIVES LIST

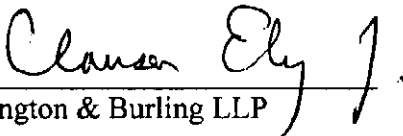
CIGARETTES

**LEGAL FIRM CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2009**

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

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

DATED this 27th day of January, 2010.



for Covington & Burling LLP

ADDITIVES LIST

CIGARETTES

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2009**

I, Thilo Paschke, Vice President of Scientific & Regulatory Affairs at JT International S.A., 1, Rue de la Gabelle, Morgines, CH-1211 Geneva 26, Switzerland (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 this 4th day of January, 2010.



Thilo Paschke, Ph.D.

SCHEDULE B

CALENDAR YEAR 2009 – JT INTERNATIONAL S.A .

Brand and brand variant including pack size	Quantity released for sale	Recommended Retail Price per pack (NZ \$, Dec. 2009)
CAMEL Filters Domestic (20s)	2980000 cigarettes	11.50
CAMEL Filters Domestic (25s)	1000000 cigarettes	13.50
CAMEL Filters Duty Free (20s)	221000 cigarettes	4.99