

Martin Doyle/John Stribling
Director General of Health
New Zealand Ministry of Health
133 Molesworth Street
Wellington
New Zealand

By Courier

03.12.2015

2015 JTI INGREDIENT SUBMISSION

Dear Mr. Doyle, dear Mr. Stribling,

JT International Germany GmbH ("**JTI**") lodges this submission on behalf of JT International Germany GmbH as the relevant manufacturer and 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 ISO 17025 accredited laboratories¹, approved by the European authorities in the countries of their registration and recognized by the European Commission.

¹ *Laboratories employed to verify tar, nicotine and carbon monoxide include Gallaher Limited 0448, R&D Division, 201 Galgorm Road, Lisnafillan, Ballymena, Co Antrim, Northern Ireland, BT42 1HS and JT International Germany GmbH, Abrauchanalytik, Diederhofener Str. 30, 54294 Trier, Germany.*

[JT International Germany GmbH]

Anschluß: Diederhofener Str. 30, 54294 Trier, Germany
Telefon: +49 (0)651 686 10, Telefax: +49 (0)651 686 1810
Aufsichtsratsvorsitzender: Hans Georg Bernheim
Geschäftsführer: Georgios Bletsas, Jürgen Rademacher, Stephan Schroder
Sitz der Gesellschaft: Trier, Registergericht Wittlich, Handelsregister Nr. HRB 40577
Bankverbindung: Citibank, 0211314004, BLZ 502 10000, Swift: CITIDF33, IBAN: DE22 5021 0000 0211 3140 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.

Yours sincerely,

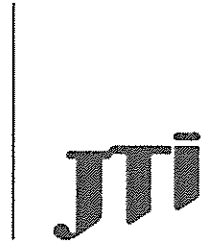
A handwritten signature in black ink, appearing to read 'J. Gorges'.

Jochen Gorges
SRA Product Compliance
Vice President

A handwritten signature in black ink, appearing to read 'M. Schneider'.

Michael Schneider
Production
Director

Encl.



New Zealand Submission 2015*

* Reporting period: 01.01.2015 – 31.12.2015

SCHEDULE A
CALENDAR YEAR 2015 – JT INTERNATIONAL
CIGARETTE

Attached



ADDITIVES LIST

CIGARETTES

**PARTICIPATING COMPANY CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2015**

I, Jochen Gorges, Director Product Compliance at 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 11th day of January 2016

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

Jochen Gorges
SRA Product Compliance
Vice President

**ADDITIVES LIST
CIGARETTES**

**LEGAL FIRM CERTIFICATE
IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2015**

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 14 day of JANUARY, 2016.

Clayton Ely
for Covington & Burling LLP

CIGARETTES

Ingredients in Cigarettes produced by British American Tobacco, Imperial Tobacco, and JT International, and sold in New Zealand in 2015

Prefix	Component Name	Quantity Not Exceeded (%)
	Water	14.8000
	Sugars, Invert, White	3.6982
	Propylene Glycol	2.7666
	Glycerol	2.0253
	Menthol	1.2558
	Cellulose, Cellulose Fibre	1.2432
L-	Menthol	0.6400
	Cocoa Extract, Mass, Shells, Powder	0.5744
	Calcium Carbonate	0.5672
	Licorice Extract, Fluid, Root Extract, Powder	0.3670
	Carob Bean Extract, Powder, Oleoresin	0.2630
	Plum Extract, Juice, Concentrate	0.2062
	Piperonal	0.0500
	Apple Juice/Concentrate	0.0250
	Fenugreek Extract, Oil, Oleoresin	0.0250
	Molasses, Sugar Cane, Molasses Extract, Essence	0.0250
	Prune Juice/Concentrate, Extract	0.0250
	Apricot Extract, Juice	0.0100
	Balsam Peru Oil, Resinoid, Oleoresin	0.0100
	Benzoin Resinoid And/Or Resin Extract	0.0100
	Coffee Extract	0.0100
	Ethyl Butyrate	0.0100
	Fig Extract	0.0100
	Guava Extract	0.0100
	Methylcyclopentenolone	0.0100
	Orange Oil, Distilled	0.0100
	Peppermint Oil	0.0100
	Phenyl Carbinol	0.0100
	Raisin Extract, Juice, Concentrate	0.0100
	Sorbitol	0.0100
	Sugar Cane Extract	0.0100
	Vanillin	0.0100
	Acetoin	0.0010
	Benzaldehyde	0.0010
	Benzyl Carbinol	0.0010
	Caramel And/Or Caramel Color	0.0010
	Cardamom Seed Oil	0.0010
	Clary Sage Oil	0.0010

	Coriander Extract And/Or Seed Oil	0.0010
Delta-	Decalactone	0.0010
	Ethyl Maltol	0.0010
	Ethyl Phenylacetate	0.0010
	Ethyl Vanillin	0.0010
Gamma-	Hexalactone	0.0010
	Isoamyl Acetate	0.0010
	Isoamyl Isovalerate	0.0010
	Isovaleric Acid	0.0010
	Maltol	0.0010
	Menthyl Isovalerate	0.0010
2-	Methyl Butyric Acid	0.0010
Gamma-	Nonalactone	0.0010
	Nutmeg/Mace Oil	0.0010
	Orange Oil, Sweet	0.0010
	Phenethyl Phenylacetate	0.0010
	Sodium Hydroxide	0.0010
2,3,5,6-	Tetramethylpyrazine	0.0010
	Vanilla Extract And/Or Oleoresin	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
	Acetic Acid	0.0001
2-	Acetylpyrazine	0.0001
	Amyl Butyrate	0.0001
	Beta-Ionone	0.0001
	Butyric Acid	0.0001
	Cassia Bark Oil	0.0001
	Celery, Celery Seed Extract And/Or Oil	0.0001
	Citric Acid	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-	Dimethyldihydrofuranolone	0.0001
2,5-	Dimethylpyrazine	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
5-	Ethyl-3-Hydroxy-4-Methyl-2(5H)-Furanone	0.0001
	Gentian Root Extract	0.0001
	Geraniol	0.0001
	Guaiacol	0.0001
	Hexanoic Acid	0.0001
	Hexyl Acetate	0.0001
Beta-	Ionone	0.0001
Alpha-	Irone	0.0001
	Isoamyl Phenylacetate	0.0001
	Isobutyraldehyde	0.0001
	Jasmine Extract	0.0001
	Labdanum Extract, Oil, Oleoresin	0.0001
	Linalyl Acetate	0.0001
	Lovage Extract And/Or Oil	0.0001
	Methyl 2-Pyrrolyl Ketone	0.0001
5-	Methyl Quinoxaline	0.0001
4-	Methylacetophenone	0.0001
	Phenylacetic Acid	0.0001
	Propenylguaethol	0.0001
	Propyl Acetate	0.0001
3-	Propylidene Phthalide	0.0001
	Rose Extract And/Or Oil	0.0001
	Tea Extract And/Or Powder	0.0001
	Tomato Extract	0.0001
	Trans-Anethole	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
	Isopentane	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: 2015 12 months to 31 December 2015

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): 821 kg

b) Weight of Additives in Total by Product Class (excluding water): 42 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:

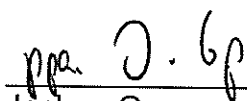
- i. All additives used in tobacco in the brands and brand variants in the Calendar Year have been listed in Schedule A.
- ii. No additive has been named for inclusion in Schedule A unless that additive was used in such tobacco products.
- iii. No additive was used in the Company's brands and brand variants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

d) Brand information: See attached Schedule B

I, Jochen Gorges, Germany, Director Product Compliance, 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 11th day of January 2016.



Jochen Gorges
SRA Product Compliance
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: 2015 12 months to 31 December 2015

Product: Cigarettes

Brand and brand variant	Tar (mg/ cig.)	Nicotine (mg/ cig.)	CO (mg/ cig.)
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, R&D 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 2014 for the purposes of Section 33 of the Smoke-free Environments Act 1990.

Dated at Trier, Germany, this 11th day of January 2016.


Jean Dupont
Research & Development
Quality Assurance & Lisnafillan R&D Center
Vice President

SCHEDULE B



CALENDAR YEAR 2015 – 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 (Box) (Domestic)	1.18 Million cigarettes	\$18.80 NZD
Camel Filter 84 (Box) (Duty Free)	0.07 Million cigarettes	\$10.49 NZD