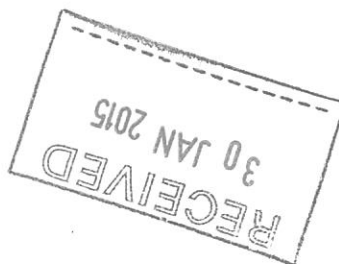




Martin Doyle/John Stribling
Director General of Health
New Zealand Ministry of Health
133 Molesworth Street
Wellington
New Zealand



By Courier

January 23, 2015

2014 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, Diedenhofener Str. 30, 54294 Trier, Germany.*

JT International Germany GmbH

Anschrift: Diedenhofener Str. 30, 54294 Trier, Germany
Telefon: +49 (0)651 686 10, Telefax: +49 (0)651 686 1810
Aufsichtsratsvorsitzender: Hans Georg Bornheim
Geschäftsführer: Georgios Bletsas, Jürgen Rademacher, Stephan Schröder
Sitz der Gesellschaft: Trier, Registergericht Wittlich, Handelsregister Nr. HRB 40577
Bankverbindung: Citibank, 0211 814 004, BLZ: 502 109 00, Swift: CITIDEFF, IBAN: DE22 5021 0900 0211 8140 04



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 'Jean Dupont'.

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

Encl.



New Zealand Submission 2014*

* Reporting period: 01.01.2014 – 31.12.2014

SCHEDULE A
CALENDAR YEAR 2014 – JT INTERNATIONAL
CIGARETTE

Attached



ADDITIVES LIST

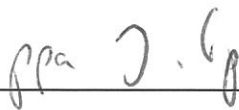
CIGARETTES

PARTICIPATING COMPANY CERTIFICATE IN RESPECT OF CALENDAR YEAR TO 31 DECEMBER 2014

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 23 day of January 2015



Jochen Gorges



FORM OF RETURN

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

Calendar Year: 2014 12 months to 31 December 2014

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): 1458 kg

b) Weight of Additives in Total by Product Class (excluding water): 75 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 23rd day of January 2015.



Jochen Gorges

CIGARETTES

Ingredients in Cigarettes produced by British American Tobacco, Imperial Tobacco, and JT International, and sold in New Zealand in 2014

| Prefix | Component Name | Quantity Not Exceeded (%) |
|--------|--|---------------------------|
| | Water | 12.8000 |
| | Sugars | 3.6803 |
| | Propylene Glycol | 2.7637 |
| | Glycerol | 2.0297 |
| | Sugar, Brown | 1.8453 |
| | Sugar, Inert | 1.3379 |
| | Menthol | 1.2558 |
| | Sucrose and/or Sucrose Syrup | 1.2545 |
| | Cellulose Fibre | 1.2432 |
| | Calcium Carbonate | 0.7054 |
| L- | Menthol | 0.6400 |
| | Cocoa and Cocoa Products | 0.6167 |
| | Cocoa Powder | 0.5745 |
| | Cocoa Extract, Mass, Shells, Powder | 0.5053 |
| | Licorice Extract, Root Extract, Powder | 0.3672 |
| | Guar Gum | 0.3414 |
| | Carob Bean Extract, Powder, Oleoresin | 0.2585 |
| | Licorice Extract, Fluid | 0.2473 |
| | Plum Extract, Juice, Concentrate | 0.2092 |
| | Fig Juice Concentrate and/or Extract | 0.0500 |
| | Molasses, Molasses Extract, Essence | 0.0500 |
| | Raisin Extract and/or Concentrate | 0.0500 |
| | Apple Juice/Concentrate | 0.0250 |
| | Fenugreek Extract, Oil, Oleoresin | 0.0250 |
| | Prune Juice/Concentrate | 0.0250 |
| | Balsam Oil, Peru | 0.0100 |
| | Benzoin Gum Sumatra | 0.0100 |
| | Benzoin Resinoid and/or Resin Extract | 0.0100 |
| | Benzyl Carbinol | 0.0100 |

| Prefix | Component Name | Quantity Not Exceeded (%) |
|--------|---------------------------------|---------------------------|
| | Dextrose | 0.0100 |
| | Ethanol | 0.0100 |
| | Ethyl Maltol | 0.0100 |
| | Fenugreek Extract | 0.0100 |
| | Guava Extract | 0.0100 |
| | Peppermint Oil | 0.0100 |
| | Phenylacetic Acid | 0.0100 |
| | Rum | 0.0100 |
| | Sorbitol | 0.0100 |
| | Sugar Cane Extract | 0.0100 |
| | Vanillin | 0.0100 |
| | Acetic Acid | 0.0010 |
| | Acetoin | 0.0010 |
| 2- | Acetylthiazole | 0.0010 |
| | Caramel | 0.0010 |
| | Cassia Extract (Fistula) | 0.0010 |
| | Coffee Extract | 0.0010 |
| | Delta-Decalactone | 0.0010 |
| 2,5- | Dimethyldihydrofuranolone | 0.0010 |
| | Fenugreek Oleoresin | 0.0010 |
| GAMMA- | Hexalactone | 0.0010 |
| | Isoamyl Acetate | 0.0010 |
| | Isoamyl Isovalerate | 0.0010 |
| | Isoamyl Phenylacetate | 0.0010 |
| | Isovaleric Acid | 0.0010 |
| | Lovage Extract | 0.0010 |
| | Mace Oil | 0.0010 |
| | Maltol | 0.0010 |
| | Methylcyclopentenolone | 0.0010 |
| GAMMA- | Nonalactone | 0.0010 |
| | Phenethyl Alcohol | 0.0010 |
| | Phenyl Carbinol | 0.0010 |
| | Piperonal | 0.0010 |
| | Poly-Dimethyl Siloxane Emulsion | 0.0010 |

| Prefix | Component Name | Quantity Not Exceeded (%) |
|--------|--|---------------------------|
| | Sodium Hydroxide | 0.0010 |
| | Vanilla Extract and/or Oleoresin | 0.0010 |
| | Acetophenone | 0.0001 |
| 2- | Acetylpyrazine | 0.0001 |
| | Amylbutyrate | 0.0001 |
| | Angelica Root Oil | 0.0001 |
| | Anise Star Oil | 0.0001 |
| | Benzaldehyde | 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 |
| | Clary Sage Oil | 0.0001 |
| 2,3,4- | Clopentadione | 0.0001 |
| | Coriander Extract and/or Oil | 0.0001 |
| BETA- | Damascone | 0.0001 |
| | Davana Oil | 0.0001 |
| | Decanoic Acid | 0.0001 |
| PARA- | Diacetyl | 0.0001 |
| | Dimethoxybenzene | 0.0001 |
| | Dimethyl-1 | 0.0001 |
| 4,5- | Dimethyl-3-Hydroxy-2,5-Dihydrofuranone | 0.0001 |
| 3,7- | Dimethyl-6-Octenoic Acid | 0.0001 |
| | Ethyl 2-Methylbutyrate | 0.0001 |
| | Ethyl Acetate | 0.0001 |
| | Ethyl Butyrate | 0.0001 |
| | Ethyl Decanoate | 0.0001 |
| | Ethyl Hexanoate | 0.0001 |
| | Ethyl Isovalerate | 0.0001 |
| | Ethyl Lactate | 0.0001 |
| | Ethyl Oenanthate | 0.0001 |
| | Ethyl Palmitate | 0.0001 |
| | Ethyl Phenylacetate | 0.0001 |

| Prefix | Component Name | Quantity Not Exceeded (%) |
|--------|--|---------------------------|
| | Ethyl Propionate | 0.0001 |
| | Ethyl Vanillin | 0.0001 |
| | Ethyl-10-Undecenoate | 0.0001 |
| 5- | Ethyl-3-Hydroxy-4-Methyl-2 (5H)-Furanone | 0.0001 |
| | Gamma-Decalactone | 0.0001 |
| | Gamma-Nonalactone | 0.0001 |
| | Gentian Root Extract | 0.0001 |
| | Geraniol | 0.0001 |
| | Hexanoic Acid | 0.0001 |
| | Hexylacetate | 0.0001 |
| BETA- | Ionone | 0.0001 |
| | Isoamyl Acetate | 0.0001 |
| | Jasmine Extract | 0.0001 |
| | Labdanum Extract, Oil, Oleoresin | 0.0001 |
| | Linalyl Acetate | 0.0001 |
| | Isobutyraldehyde | 0.0001 |
| | Menthyl Valerate | 0.0001 |
| PARA- | Methoxybenzaldehyde | 0.0001 |
| | Methyl 2-Pyrrolyl Ketone | 0.0001 |
| 5- | Methyl Quinoxaline | 0.0001 |
| 4- | Methylacetophenone | 0.0001 |
| 2- | Methylbutyric Acid | 0.0001 |
| | Myristic Acid | 0.0001 |
| GAMMA- | Nonalactone | 0.0001 |
| | Nutmeg Oil | 0.0001 |
| | Octadecanoic Acid (Stearic Acid) | 0.0001 |
| GAMMA- | Octalactone | 0.0001 |
| | Octanoic Acide (Caprylic Acid) | 0.0001 |
| | Orange Oil, Distilled | 0.0001 |
| | Orange Oil, Sweet | 0.0001 |
| | Phenethyl Phenylacetate | 0.0001 |
| | Phenylacetic Acid | 0.0001 |
| | Propenyl Guaethol | 0.0001 |

| Prefix | Component Name | Quantity Not Exceeded (%) |
|-----------|---|---------------------------|
| | Propylacetate | 0.0001 |
| 3- | Propylidene Phthalide | 0.0001 |
| | Rose Extract and/or Oil | 0.0001 |
| | Tea Extract and/or Powder | 0.0001 |
| 2,3,5,6- | Tetramethylpyrazine | 0.0001 |
| | Trans-Anethole | 0.0001 |
| 2- | Tridecanone | 0.0001 |
| 4-(2,6,6- | Trimethylcyclohexa-1,3 Dienyl But 2- En-4-One (Beta-Damascenone) | 0.0001 |
| 2,3,5- | Trimethylpyrazine | 0.0001 |
| GAMMA- | Undecalactone | 0.0001 |
| GAMMA- | Valerolactone | 0.0001 |
| | Veratraldehyde | 0.0001 |
| | Vetiver Oil | 0.0001 |
| | Carbon Dioxide | 0.0000 |
| | Isopentane | 0.0000 |
| | Nitrogen | 0.0000 |
| | Ethyl Alcohol | - |



**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: 2014 12 months to 31 December 2014

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 22nd day of January 2015.

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

SCHEDULE B



CALENDAR YEAR 2014 – 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) | 1.72 Million cigarettes | \$18.80 NZD |
| Camel Filter 84 (Box) (Duty Free) | 0.16 Million cigarettes | \$10.49 NZD |