

4 LABELS, LABELING AND ADVERTISING

4.1 Introduction

Section 911(d)(1) of the TCA requires that applications for modified risk tobacco products include a description of any proposed advertising and labeling and provide sample product labels and labeling ([TCA Section 911\(d\)\(1\)](#)). In addition, FDA MRTP Draft Guidance recommends that an applicant's description of the proposed advertising and labeling include the following information: (1) copies of any draft promotional materials (*e.g.*, advertising and labeling) developed by the time of filing¹; and (2) a description of how the applicant intends to communicate the proposed modified risk claim(s) to consumers, including by means other than product label, labeling, or advertising ([FDA MRTPA Draft Guidance 2012](#), pp. 11-12, 35).

In this section of the Application, and in accordance with the TCA and FDA's MRTPA Draft Guidance, RJRT submits copies of the draft modified risk advertising which has been developed at the time of filing this Application. In addition, this section of the Application contains detailed descriptions of how RJRT intends to communicate the proposed modified risk claims to consumers. In particular, RJRT proposes to use print advertising, direct mail, e-mail, a branded website, and direct consumer engagement marketing strategies to communicate the modified risk claims. Electronic copies of the draft advertising materials in each of these areas are described below and are submitted with this Application.

The labeling and advertising for each of the Camel Snus Products covered by this Application currently contain the four warning label statements mandated by Section 3(d) of the Comprehensive Smokeless Tobacco Health Education Act of 1986 ("CSTHEA"), as amended by Section 204 of the TCA ([TCA Section 204\(a\)\(1\)](#)). These four statutorily-mandated warnings are:

1. WARNING: This product can cause mouth cancer.
2. WARNING: This product can cause gum disease and tooth loss.
3. WARNING: This product is not a safe alternative to cigarettes.
4. WARNING: Smokeless tobacco is addictive.

RJRT is not proposing any changes to the existing warning label statements on product packaging or advertising. In addition, RJRT is not proposing any changes to the current packaging for Camel Snus products. This Application proposes to use modified risk advertising

¹ FDA recognizes that some promotional materials may be derivative of other materials submitted in the Application, representing only minor differences in layout or format, or displaying a different health warning than material submitted in the application. Such derivative materials may be omitted ([FDA MRTPA Draft Guidance 2012](#), p. 11-12).

in addition to the statutorily-mandated warning label statements on advertising and promotional materials used for Camel Snus.

4.2 Proposed Modified Risk Advertising Executions

With this Application, RJRT presents scientific evidence that supports an advertising claim that smokers who switch completely to using Camel Snus tobacco products instead of smoking cigarettes can reduce individual risks to their health. Specifically, RJRT is requesting that FDA issue an MRTTP order allowing each of three different advertising executions to communicate a modified risk claim to adult smokers:

Advertising Execution 1

Smokers who **switch completely** from cigarettes to Camel SNUS can significantly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease.

Advertising Execution 2

Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease.

Advertising Execution 3

Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer and respiratory disease.

RJRT developed these three advertising executions through an iterative process. Initially, a series of qualitative focus groups and preliminary consumer comprehension/perception research was used for messaging development, resulting in advertising execution 1. Upon completion of the draft promotional materials for execution 1, RJRT tested advertising execution 1 using comprehension and perception studies and likelihoods of use studies. While those studies were in progress, RJRT initiated development and testing of two additional advertising executions based on TPSAC member comments at the April 9-10, 2015 TPSAC meeting. Testing of advertising executions 2 and 3 for consumer comprehension and perception, and testing for likelihoods of use was then initiated.

During the April 9-10, 2015 TPSAC meeting, there was significant discussion about the following issues: simplicity; reading level; comprehension; and the sufficiency of the evidence submitted in support of Swedish Match's claim that the evidence showed Swedish snus was not associated with various diseases (*e.g.*, oral cancer, gum disease, and tooth loss). In addition, some TPSAC members expressed concerns about the complexity of the word "significantly." In executions 2 and 3, RJRT replaced the word "significantly" with the word "greatly" to increase consumer comprehension. In addition, TPSAC members generally agreed that Swedish snus products when used exclusively confer lower health risks than cigarettes in terms of respiratory and cardiovascular diseases, however, for other disease end points, TPSAC members did not feel as definitive ([PMTA \(Premarket Tobacco Application\) Technical Project Lead \(TPL\) Review, CTP](#),

[PM0000010-PM0000017, 11-03-2015,](http://www.fda.gov/downloads/TobaccoProducts/Labeling/TobaccoProductReviewEvaluation/UCM472123.pdf)

<http://www.fda.gov/downloads/TobaccoProducts/Labeling/TobaccoProductReviewEvaluation/UCM472123.pdf>).

Based on these TPSAC comments, RJRT prepared a proposed advertising execution 3 focused solely on lower risk for lung cancer and respiratory disease.

RJRT believes that the scientific evidence submitted in support of this Application permits FDA to issue an order authorizing the use of the modified risk advertising executions proposed above and set forth in detail below. RJRT considers the proposed modified risk advertising to be completely appropriate given the substantial body of epidemiologic evidence, clinical studies, pre-clinical studies, population modeling, and other data that demonstrate that switching completely from cigarettes to Camel Snus can reduce the risk of serious diseases (lung cancer, oral cancer, respiratory disease, and heart disease) to individual users. Further, RJRT believes that substantial population level public health benefits will result if sufficient numbers of smokers switch to Camel Snus.

Therefore, consistent with its corporate strategy of transforming tobacco and the substantial overall public health benefit that will be achieved if smokers migrate from using combusted tobacco products to non-combustible tobacco products, RJRT requests that FDA issue an MRTP order so that RJRT may advertise and market Camel Snus to current smokers encouraging them to switch completely and lower risks to their health.

RJRT has created an advertising plan to communicate the three modified risk claims to smokers, which includes print advertising, direct mail, e-mail, a branded website, and direct consumer engagement. The development of the advertising and substance and methods of communication are described below, along with copies of the draft proposed advertising materials created to date for each of these areas of consumer communications. Importantly, in addition to modified risk messaging, the draft Camel Snus modified risk advertising materials contain substantial “balancing” information about health risks of cigarette smoking, the addictive nature of tobacco products, and the existing statutorily-mandated health warnings and established name required by the TCA.

All advertising materials were developed based on focus group testing with adult smokers of Camel cigarettes or competitive full-price cigarette brands, and refined by further testing with both tobacco users and non-users. It was important to develop modified risk advertising concepts which are clearly understood by readers (including both tobacco consumers and non-users) to communicate that:

- Less risk does not equal no risk
- Complete switching is required
- Not using tobacco products at all is the best option

The target audience for all proposed modified risk advertising materials is adult smokers. RJRT has no interest in and does not want minors to purchase or possess its Camel Snus tobacco products. RJRT has no interest in and does not want to encourage non-users to use tobacco products, including Camel Snus.

As discussed in detail in Section 6.2, Section 6.3, and Section 6.4, RJRT's attractiveness, comprehension and perceptions studies of the final Camel Snus proposed modified risk advertising confirmed the following about current tobacco users. Specifically, they:

- Understand that Camel Snus presents some risk versus no risk to users, and do not perceive risks associated with other tobacco products as reduced.
- Are not misled into believing there is no risk associated with using Camel Snus, or that the risks associated with other tobacco products are reduced.
- Understand modified risk messaging that switching completely from cigarettes to Camel Snus is necessary to reduce individual disease risk.
- For the most part, comprehend the modified risk messaging that (1) switching completely is required, (2) non-users and former users should not use Camel Snus, and (3) Camel Snus is addictive.

In addition, the proposed modified risk advertising materials were tested against never tobacco users and former tobacco users to verify that viewing the proposed advertising materials would be unlikely to encourage a "gateway" effect to smoking cigarettes (see Section 6.3). The results of these studies show that even with modified risk messaging never tobacco users and former tobacco users:

- Are unlikely to use Camel Snus, and any non-users who start using Camel Snus after viewing modified risk advertising are less likely to switch to another tobacco product that presents greater risk than non-users who viewed control ads with no modified risk advertising.
- Are significantly less likely to try Camel Snus than current smokers, suggesting a low potential for tobacco use initiation or relapse, and supporting the potential for a net population health benefit.

4.3 Messaging Development for the Proposed Camel Snus Modified Risk Advertising

In order to gain information from tobacco consumers about the relevancy and effectiveness of communicating modified risk claims, (b) (4)

, RJRT's marketing research team conducted (b) (4) focus group (b) (4) . (b) (4)









(b) (4)



Qualitative Focus Group Testing

Using qualitative focus groups composed of adult smokers, RJRT tested the following proposed modified risk advertising claim: (b) (4)



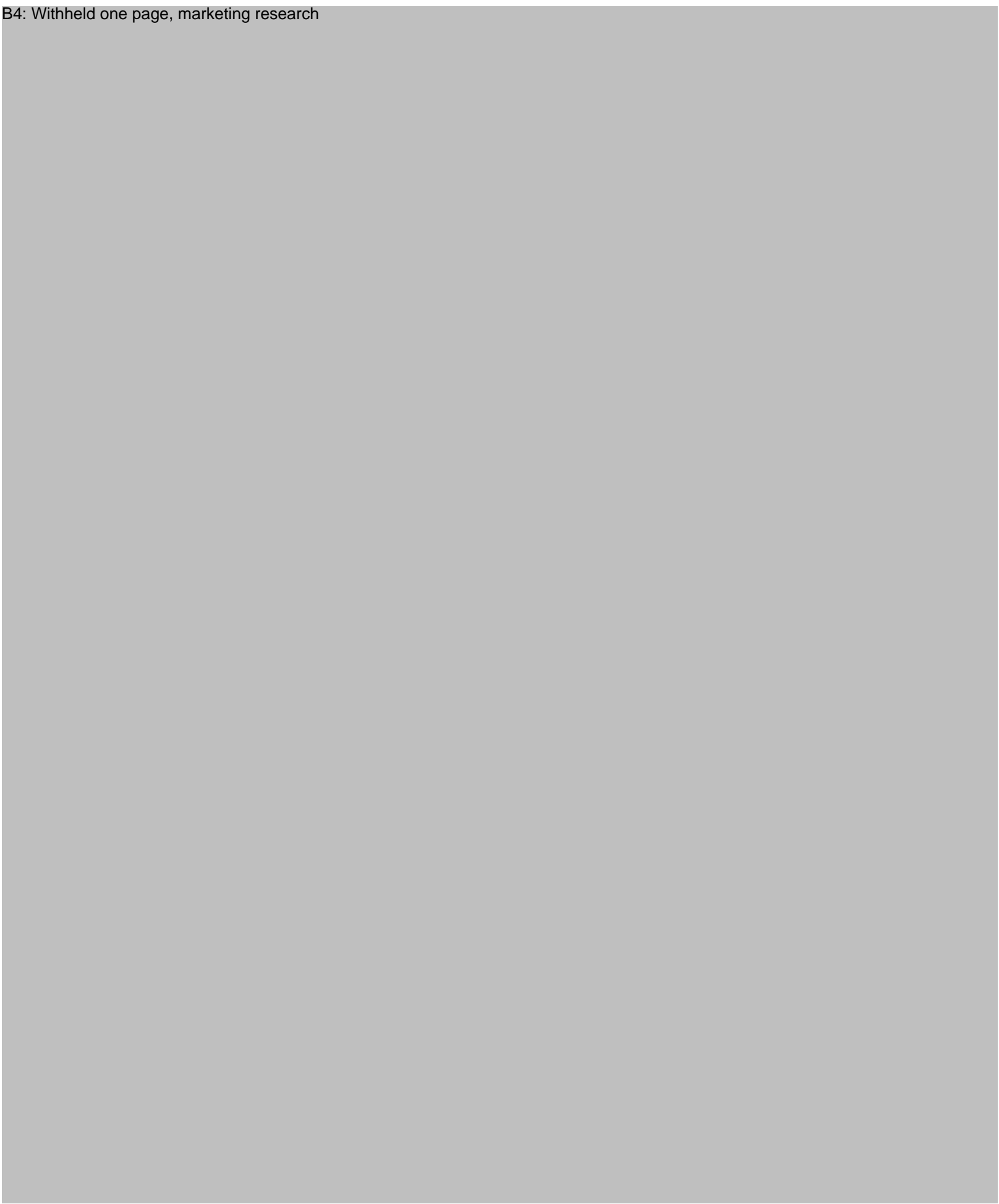
" The research objectives for the focus groups were to (a)

(b) (4)

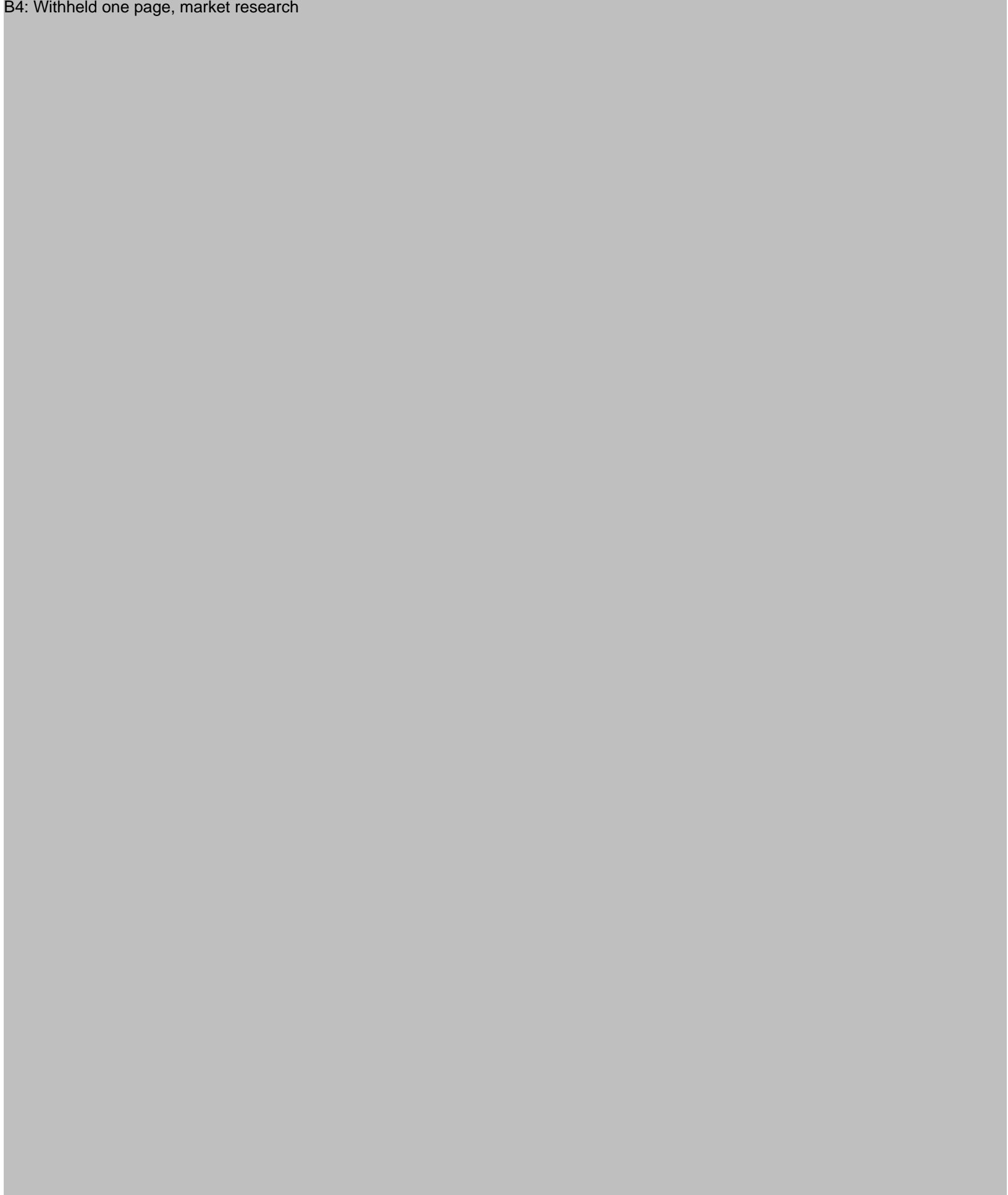


(b) (4)

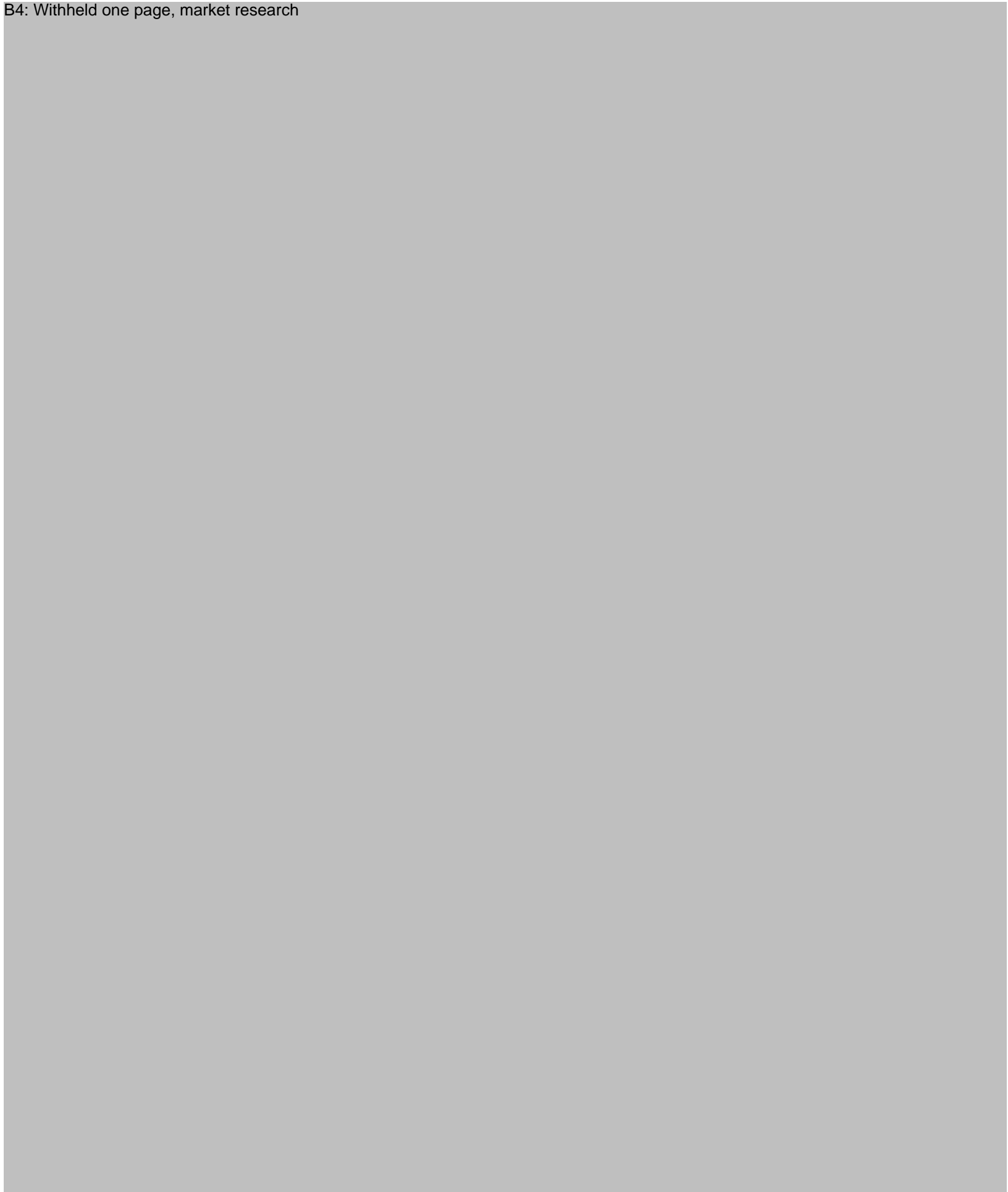












Specific findings from the (b) (4) focus group exercises included the following:

(b) (4)



(

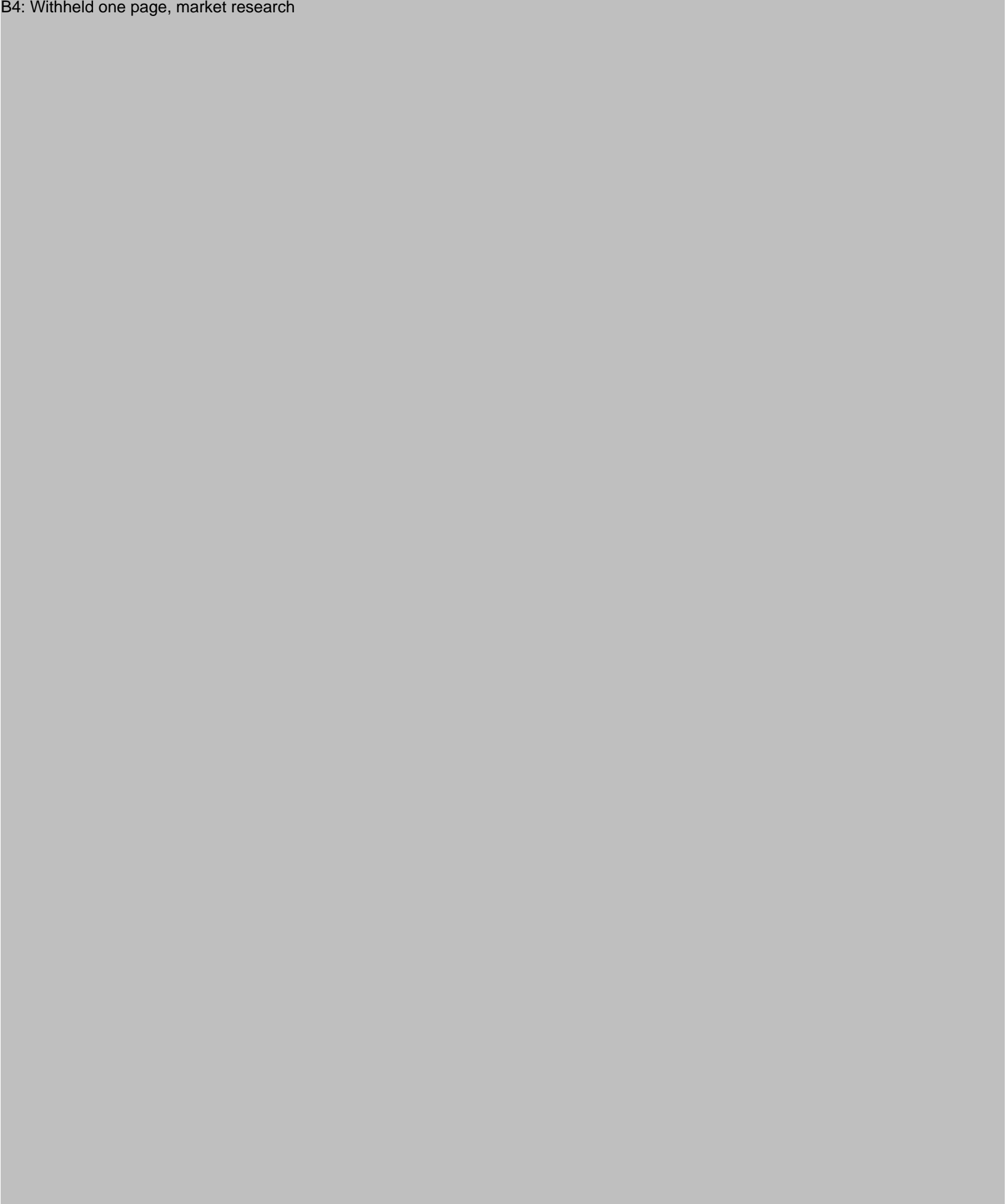


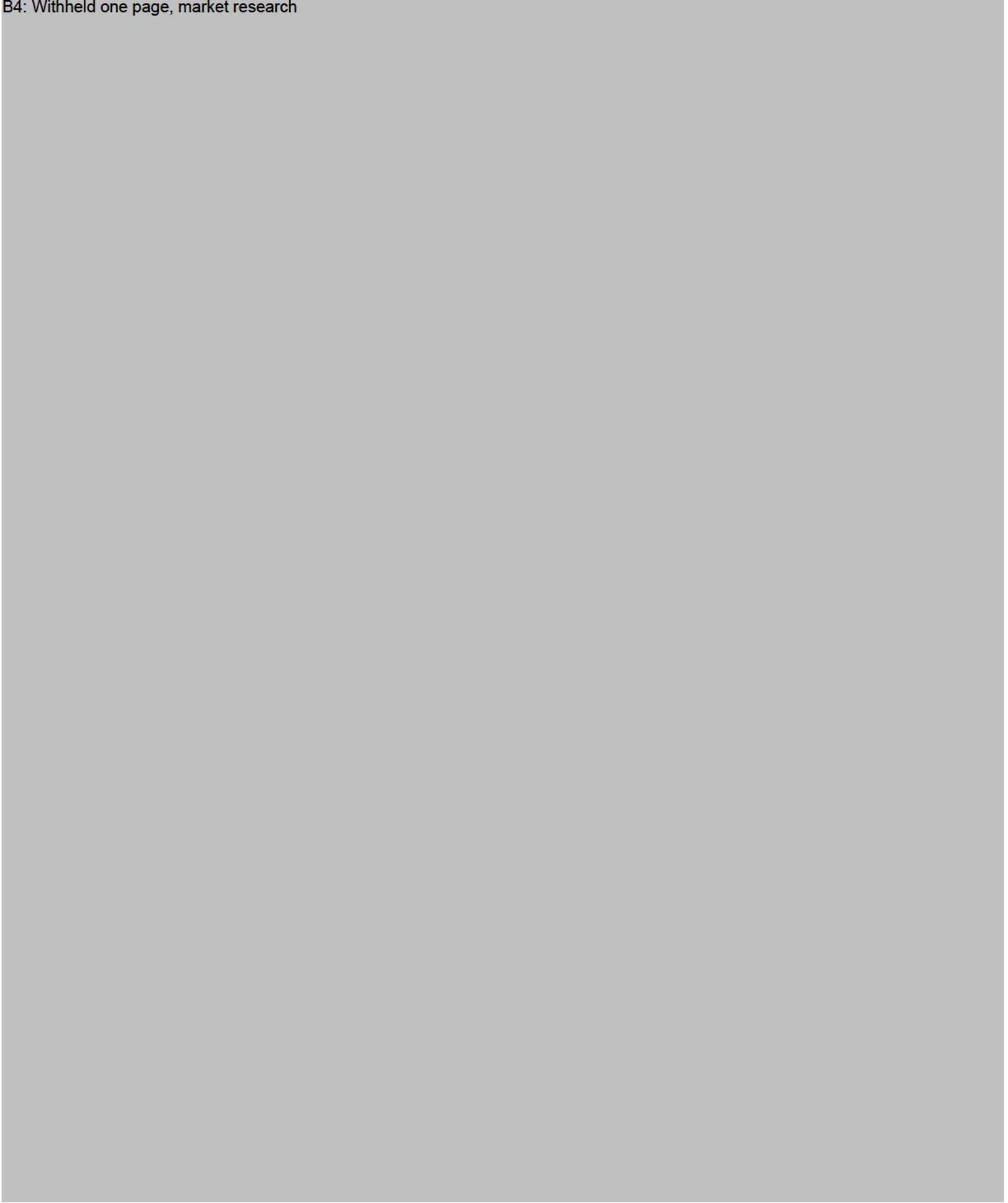


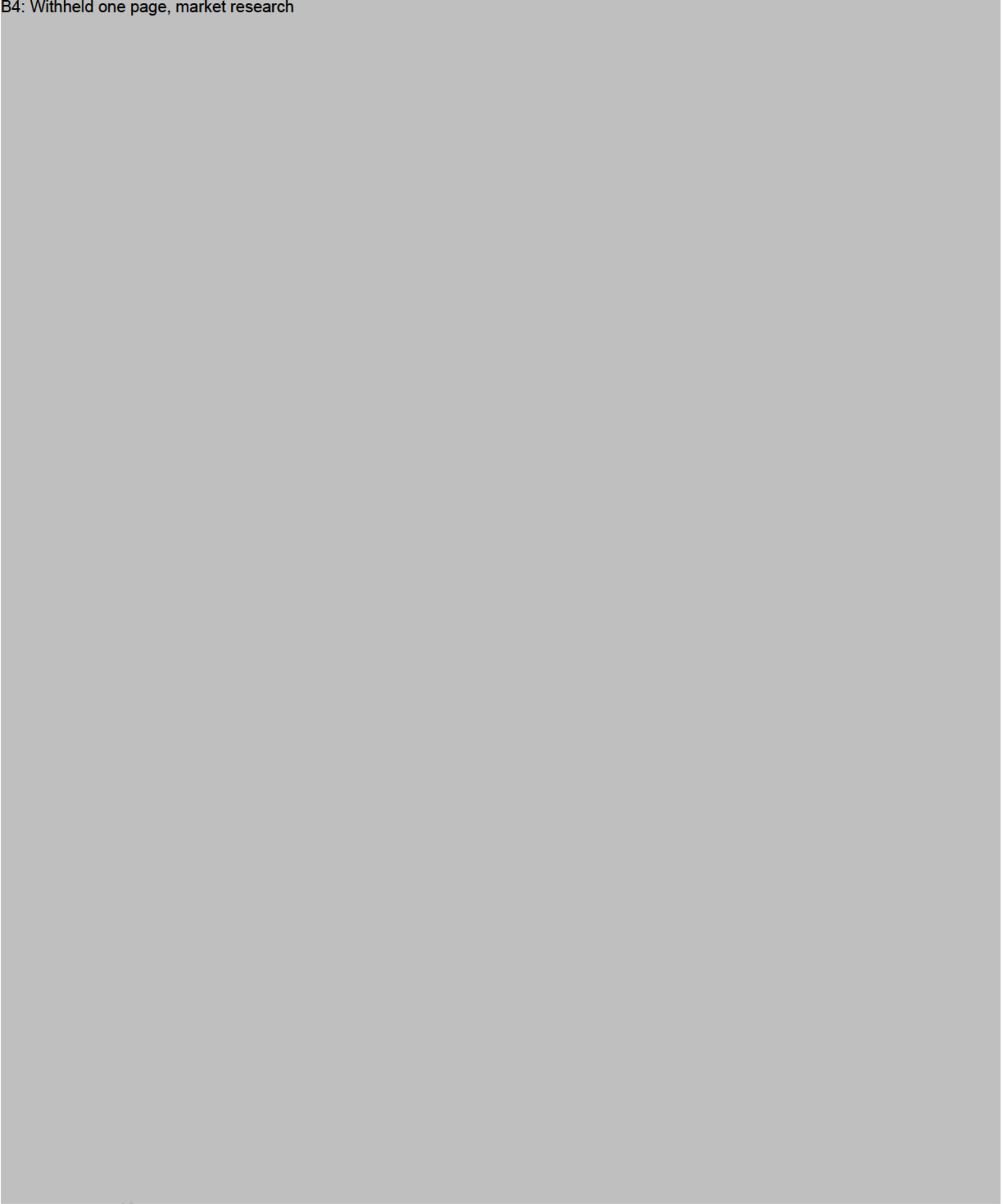
Specific findings from the (b) (4) focus group exercises included the following:

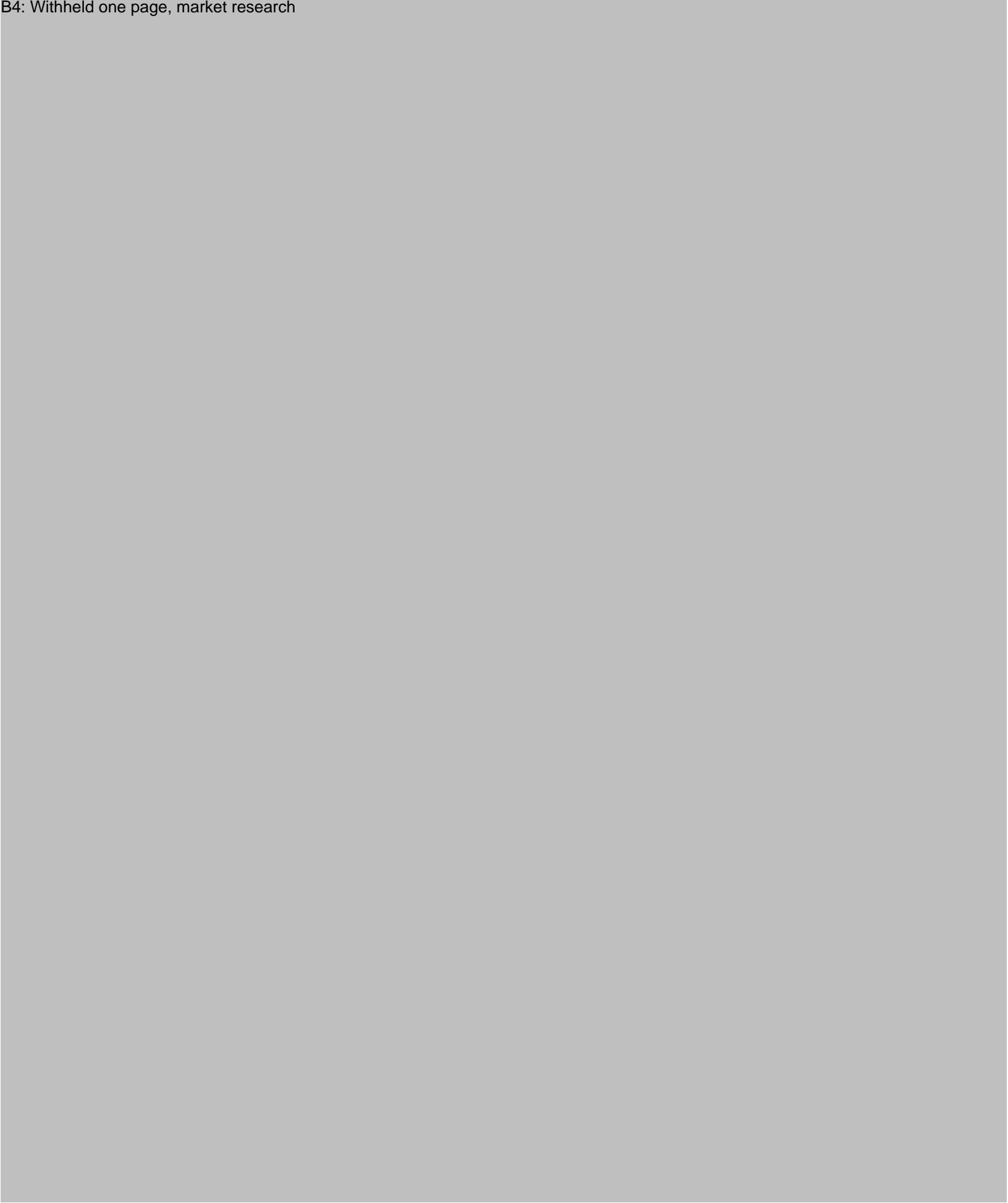
(b) (4)

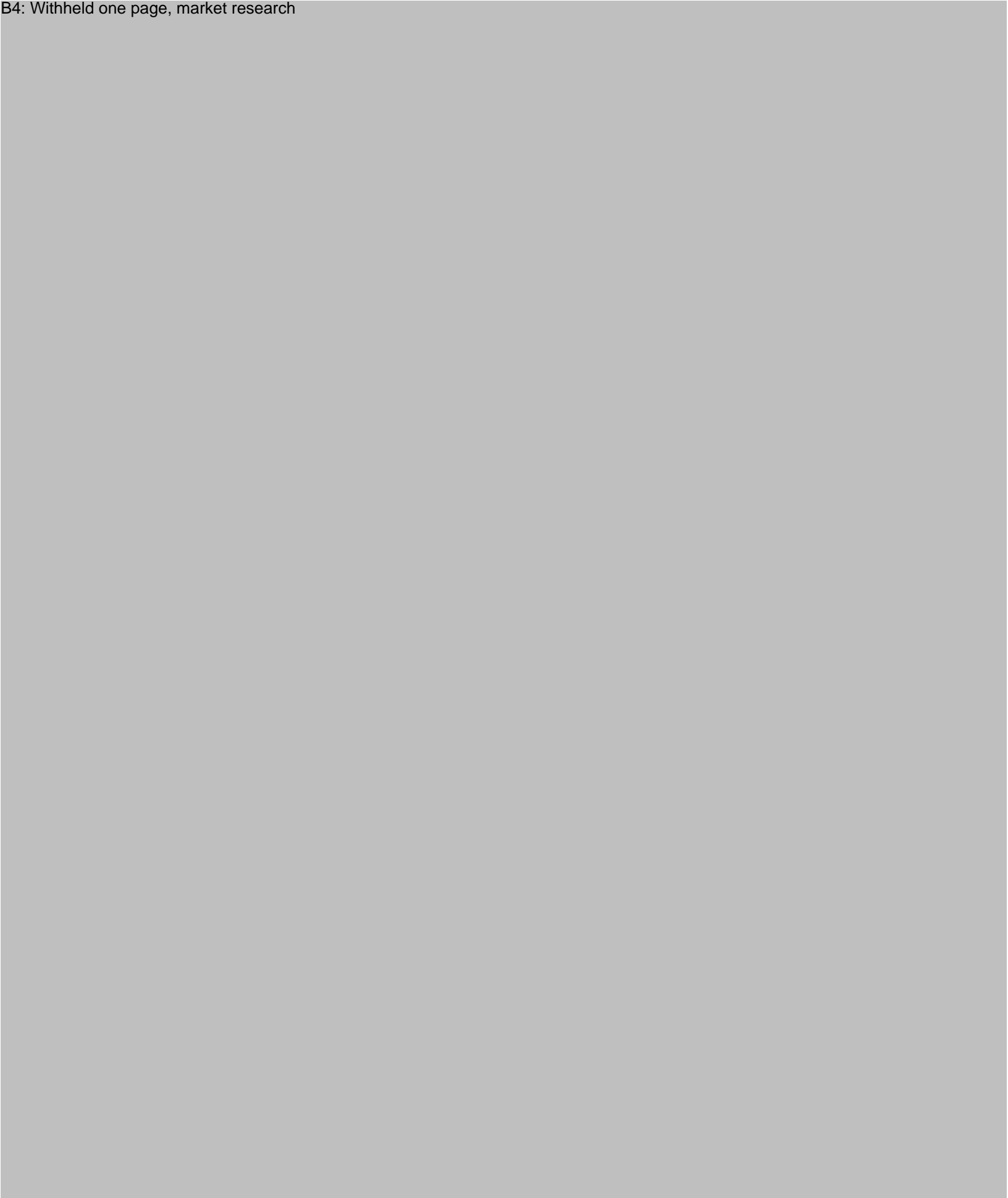












Specific findings from the (b) (4) focus group exercises included the following:

(b) (4)



4.4 (b) (4)




(b) (4)



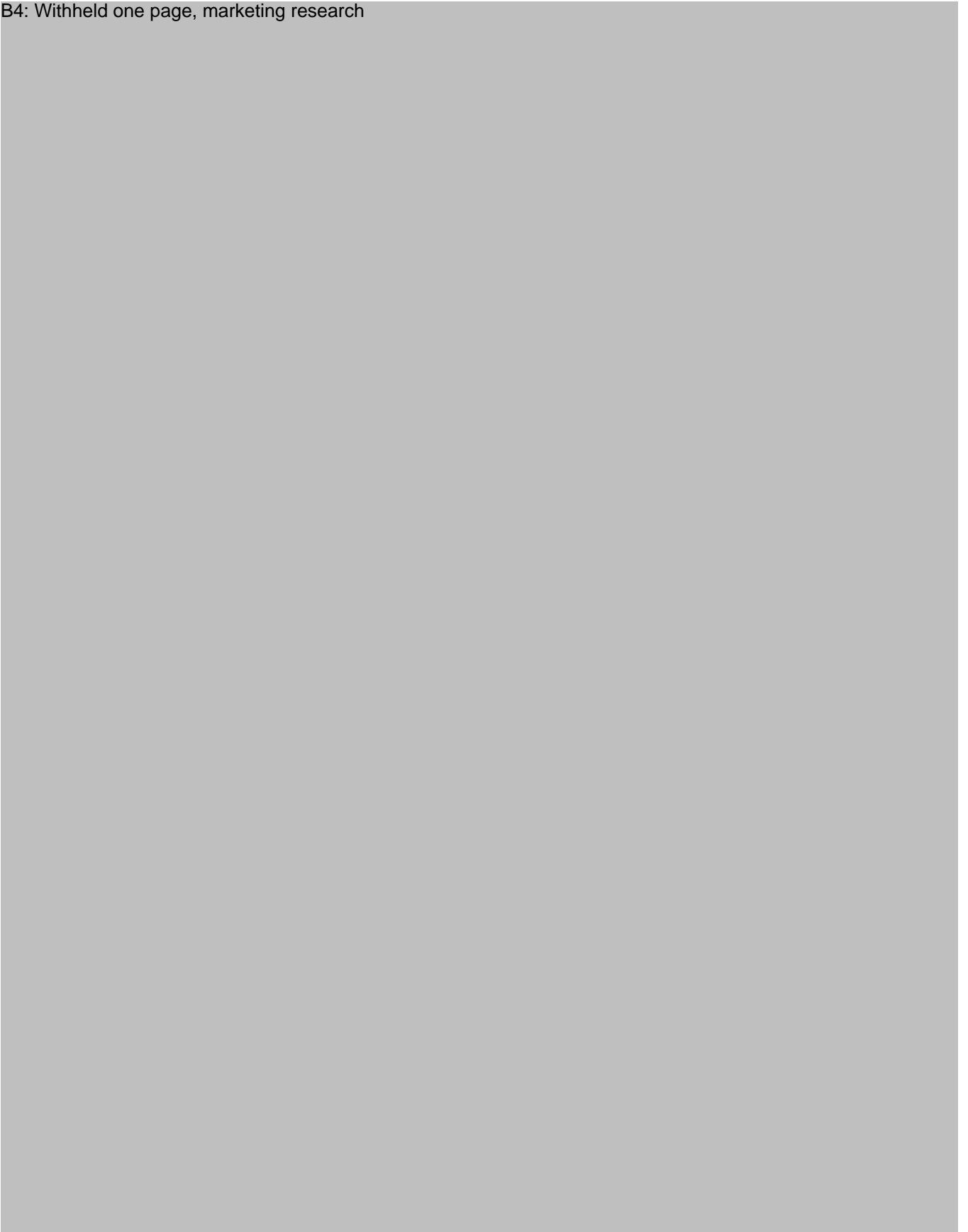
(b) (4)



B4: Withheld one page, marketing research



B4: Withheld one page, marketing research



(b) (4)

([NAXION Modified Risk Messaging Research Final Report](#), pp. 19-25).

The findings from (b) (4) research on comprehension and perception were incorporated into the development of the final proposed MRTP advertising executions 1, 2, and 3, discussed in Section 4.2 (above) and Section 4.5 (below) ([NAXION Modified Risk Messaging Research Final Report](#), pp. 18-19).

4.5 Plan for Communicating Camel Snus Modified Risk Advertising Claims to Smokers

RJRT typically uses a range of communication platforms to reach adult tobacco consumers and intends to use the same platforms with any FDA authorized Camel Snus modified risk advertising. These communication platforms include:

- PRINT ADVERTISING – publications where 85% or more of the publication's readership is 18 years old or older, or the median readership age is at least 23 years old;
- DIRECT MAIL – communications to age-verified tobacco consumers 21 years old or older who certify that he or she is a current consumer of tobacco products and wishes to receive tobacco brand communications;
- WEBSITE – a branded website where access is limited to age-verified tobacco consumers 21 years old or older who certify that he or she is a current consumer of tobacco products;
- E-MAIL – communications to age-verified tobacco consumers 21 years old or older who certify that he or she is a current consumer of tobacco products and wishes to receive tobacco brand communications; and
- CONSUMER ENGAGEMENT – in-person events conducted with age-verified tobacco consumers 21 years old or older who are willing to participate in a discussion regarding RJRT's cigarette and smokeless tobacco brands.

RJRT has created a marketing plan using the five communication platforms listed above to communicate the three proposed modified risk advertising claims to smokers. The development of the advertising and substance and methods of communication are described in the subsections below, and copies of the draft proposed advertising materials created to date for each of these five platforms of consumer communications are also included. Importantly, in addition to modified risk messaging, the draft Camel Snus modified risk advertising materials contain substantial "balancing" information about the serious health risks associated with cigarette smoking, the addictive nature of tobacco products, and the existing statutorily-mandated health warnings and established name required by the TCA.

4.5.1 Print Advertising

4.5.1.1 Proposed Modified Risk Camel Snus Advertising Execution 1

RJRT has created a draft execution of a three-page color print advertisement that communicates Camel Snus' key product attributes and the message that switching completely to Camel Snus can significantly reduce the risk of lung cancer, oral cancer, respiratory disease, and heart disease.

The proposed Camel Snus print advertising depicts the entire Camel Snus brand family, including the five available flavors and the two different product pouch sizes for Camel Snus Frost. RJRT intends to communicate MRTP claims for the entire Camel Snus portfolio as represented in this Application. RJRT does not intend to make any claims that are specific to any particular Camel Snus brand style.

The Camel Snus proposed print advertising execution 1 is provided in this Application as [Advertising Execution 1](#) and includes images for the cover pages of the print ads for the six Camel Snus brand styles, an example of the print ad cover page for one brand style with each of the four statutorily-mandated health warnings and established name, and the interior two-page ad spread that will be common to all Camel Snus brand styles. See [Advertising Execution 1](#).

Consumers will first encounter a single page of creative material depicting a single tin of Camel Snus and a succinct advertising message: "SWAP THE SMOKE FOR MORE FREEDOM & LESS RISK" (see [Figure 4-10](#) below).

Figure 4-10: Execution 1 Print Advertising Cover Pages

| Frost | Frost Large | Mellow |
|--|--|---|
|  <p>SWAP THE SMOKE FOR MORE FREEDOM & LESS RISK</p> <p><small>SNUS</small></p> <p>WARNING: Smokeless tobacco is addictive.</p> |  <p>SWAP THE SMOKE FOR MORE FREEDOM & LESS RISK</p> <p><small>SNUS</small></p> <p>WARNING: Smokeless tobacco is addictive.</p> |  <p>SWAP THE SMOKE FOR MORE FREEDOM & LESS RISK</p> <p><small>SNUS</small></p> <p>WARNING: Smokeless tobacco is addictive.</p> |
| Mint | Robust | Winterchill |
|  <p>SWAP THE SMOKE FOR MORE FREEDOM & LESS RISK</p> <p><small>SNUS</small></p> <p>WARNING: Smokeless tobacco is addictive.</p> |  <p>SWAP THE SMOKE FOR MORE FREEDOM & LESS RISK</p> <p><small>SNUS</small></p> <p>WARNING: Smokeless tobacco is addictive.</p> |  <p>SWAP THE SMOKE FOR MORE FREEDOM & LESS RISK</p> <p><small>SNUS</small></p> <p>WARNING: Smokeless tobacco is addictive.</p> |

The cover page of [Advertising Execution 1](#) features a photo of a closed tin of Camel Snus crushing a cigarette. Pursuant to the TCA requirement that all smokeless tobacco packages carry warning label statements, every advertisement includes one of the following warnings aligned with the RJRT warning rotation plan on both the cover page and on each page of the interior two-page spread, covering at least 20% of the advertising area of each page.

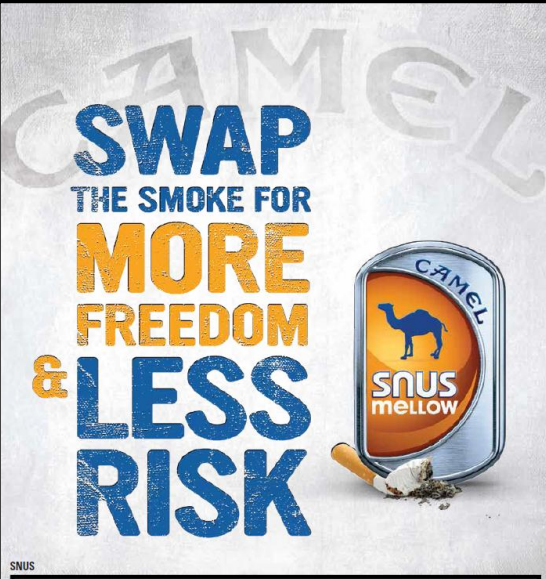
1. WARNING: This product can cause mouth cancer.
2. WARNING: This product can cause gum disease and tooth loss.
3. WARNING: This product is not a safe alternative to cigarettes.
4. WARNING: Smokeless tobacco is addictive.

Figure 4-11 shows images of the cover pages of the Camel Snus Mellow brand style with the four statutorily-mandated warnings and established name. See [Advertising Execution 1 Rotating Warnings](#).

**Figure 4-11: Execution 1 Print Advertising
Cover Pages with Warning Label Statements**



Warning 3




The advertisement features a large, faint "CAMEL" watermark in the background. The text "SWAP THE SMOKE FOR MORE FREEDOM & LESS RISK" is prominently displayed in blue and orange. To the right is a tin of Camel Snus Mellow and a crushed cigarette. A small "SNUS" label is in the bottom left corner.

SWAP
THE SMOKE FOR
MORE
FREEDOM
& **LESS**
RISK

SNUS

WARNING: This product is not a safe alternative to cigarettes.

Warning 4



The advertisement features a large, faint "CAMEL" watermark in the background. The text "SWAP THE SMOKE FOR MORE FREEDOM & LESS RISK" is prominently displayed in blue and orange. To the right is a tin of Camel Snus Mellow and a crushed cigarette. A small "SNUS" label is in the bottom left corner.

SWAP
THE SMOKE FOR
MORE
FREEDOM
& **LESS**
RISK


SNUS

WARNING: Smokeless tobacco is addictive.

The interior two-page spread is displayed in [Figure 4-12](#) below (see [Advertising Execution 1](#)). The interior two-page spread will be common to all MRTTP advertising for each of the six Camel Snus brand styles in this Application.

Figure 4-12: Execution 1 Print Advertising Interior Pages

Execution 1 Print Advertising Interior Left Page



WHAT IS CAMEL SNUS?

- Camel SNUS (rhymes with "moose") is finely ground premium tobacco in a soft fleece pouch.
- Like all tobacco products, Camel SNUS contains nicotine and is addictive.


HOW IS IT DIFFERENT?

- Many smokeless tobacco products, like dip and chew, are fermented loose tobacco.
- Sure, they're smoke-free, but they can get messy and require spitting.
- Snus is different. It's smoke-free, mess-free and spit-free.
- Camel SNUS is heat-treated, not fermented, and crafted with four main ingredients: tobacco, water, salt and flavoring.

HOW DO I USE IT?


- Smokers who use Camel SNUS **instead of** cigarettes can significantly reduce their health risks from smoking.
- Slide a pouch under your upper lip.
- Taste the real, premium tobacco.
- Dispose of the pouch in the trash when you are finished.

4 SIMPLE MAIN INGREDIENTS




2 POUCH SIZES


(actual size)




5 FLAVORS



15 POUCHES PER TIN



CUSTOMIZE YOUR ENJOYMENT WITH UP TO 30 MINUTES OF FLAVOR PER POUCH



SNUS

WARNING: Smokeless tobacco is addictive.

Execution 1 Print Advertising Interior Right Page

NO SMOKE = LESS RISK



Smokers who **switch completely** from cigarettes to Camel SNUS can significantly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease.



Scientific studies have shown that Camel SNUS contains fewer carcinogens than cigarette smoke.



Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

I'M A SMOKER. WHY WOULD I SWITCH?

No smoke means...

- No hassle
- No lingering smoke smell
- More freedom
- Fewer carcinogens
- Less risk for you and those around you



DISCOVER MORE @ SNUSNATION.COM*

NO TOBACCO PRODUCT IS SAFE

- However, smokers who use Camel SNUS **instead of** cigarettes can significantly reduce their health risks from smoking.
- Like all tobacco products, Camel SNUS contains nicotine and **is addictive**.
- Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

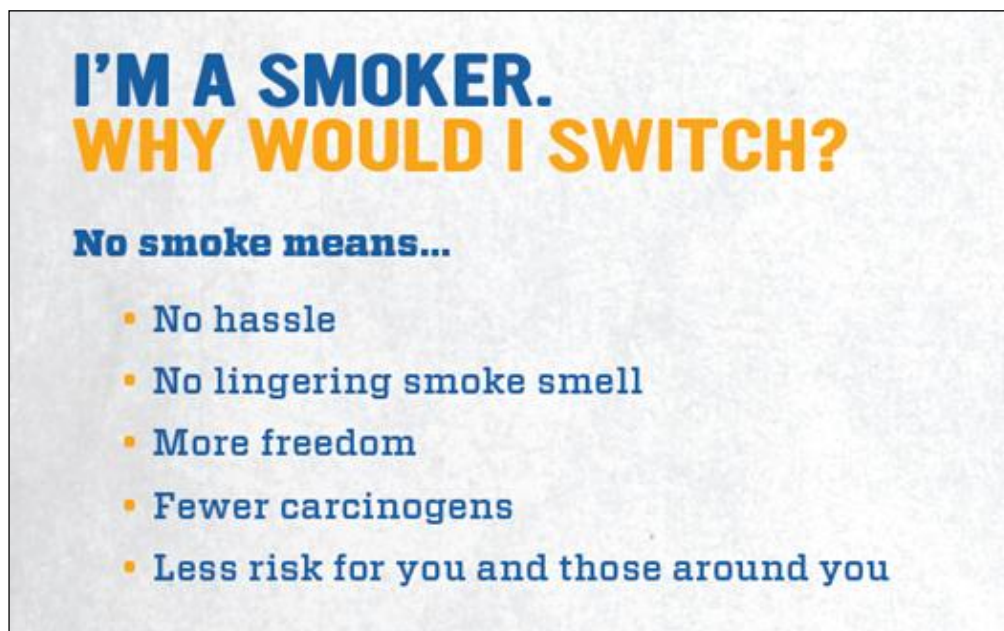
SNUS

*WEBSITE RESTRICTED TO AGE 21+ TOBACCO CONSUMERS

WARNING: Smokeless tobacco is addictive.

The two-page advertising spread presents consumers with answers to several commonly asked questions regarding what Camel Snus is and how to use it. Specific reasons why smokers should switch to Camel Snus include “No smoke means... No hassle, No lingering smoke smell, More freedom, Fewer carcinogens, Less risk for you and those around you.” See Figure 4-13; [Advertising Execution 1](#)).

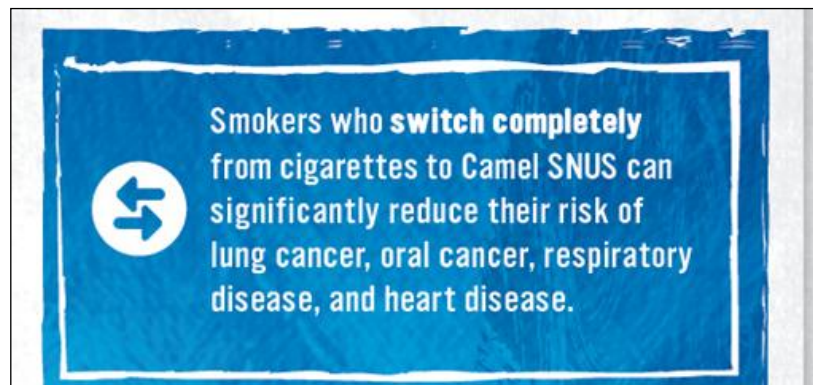
Figure 4-13: Product Attributes to Encourage Switching



Smokers are informed twice that they should switch completely from smoking cigarettes in order to reduce their risk of disease. Consumers are informed that “[s]cientific studies have shown that Camel SNUS² contains fewer carcinogens than cigarette smoke” and that “[s]mokers who **switch completely** from cigarettes to Camel SNUS can significantly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease” (see [Figure 4-12](#), [Figure 4-14](#) and [Advertising Execution 1](#)).

² SNUS in all caps in advertisement.

Figure 4-14: Switching Completely Emphasized



The proposed print advertising also provides health-related balancing information stressing the importance of quitting and not starting tobacco use: "Like all tobacco products, Camel SNUS³ contains nicotine and **is addictive**. Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products. If you're a smoker concerned about the health risks from smoking, the best choice is to quit. If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider." (See [Figure 4-15](#) below).

³ SNUS in all caps in advertisement.

Figure 4-15: Balancing Information Emphasized



The advertisement directs consumers to a website (“DISCOVER MORE @ SNUSNATION.COM”) for more information about Camel Snus products. If FDA issues an MRTP order authorizing modified risk advertising, RJRT intends to provide restricted web pages for age 21 years or older (certified and verified) tobacco consumers which would provide a platform for consumer education and engagement. Proposed Camel Snus modified risk web pages are described further in Section 4.5.3.1 below.

4.5.1.2 Proposed Modified Risk Camel Snus Advertising Execution 2

Following the April 9-10, 2015 TPSAC meeting, RJRT carefully considered the comments made by TPSAC members with respect to consumer comprehension of the term “substantially” in relation to a Swedish Match proposed modified risk tobacco product warning label statement. Swedish Match proposed changing one of the current statutorily-mandated warning label statements to “Health risks to individual users from using these snus products are **‘substantially’** lower than the health risks from smoking cigarettes.” (Emphasis added). All TPSAC members agreed that Swedish Match’s snus products present lower individual health risks to tobacco users than smoking cigarettes, but many had concerns about the definition of “substantially” and the ability of consumers to understand that term (TPSAC Meeting, April 10, 2015, Tr. at 423-447). One TPSAC member (Dr. Giovino) suggested that a simpler term like “much” with one syllable, rather than four, would be easier to understand (TPSAC Meeting, April 10, 2015, Tr. at 423-424). Another TPSAC member (Dr. Ribisl) suggested that the term “substantially” was at a grade reading level too high for a proposed warning, and that Swedish

Match should resubmit the proposed modified risk warning label for its snus products with different wording, possibly even using the word “much.” (TPSAC Meeting, April 10, 2015, Tr. at 446).

As a result of these TPSAC member comments, RJRT created a second draft proposed execution of a three-page color print advertisement substituting the word “greatly” for “significantly.” The second proposed execution would communicate to smokers Camel Snus key product attributes and the message that switching completely to Camel Snus can **greatly** reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease. (Emphasis added). In addition, print advertising execution 2 made the following changes to simplify language and emphasize health-related balancing information with respect to the MRTP claim:

- Simplify Page 1 advertising message: “SWAP THE SMOKE FOR MORE FREEDOM & LESS RISK” was changed to “NO SMOKE LESS RISK CHOOSE SNUS⁴.”
- Simpler language and switching completely emphasized: “Smokers who use Camel SNUS **instead of** cigarettes can significantly reduce their health risks from smoking” was changed to “**Switch completely** from cigarettes to Camel SNUS.”
- Simpler language and switching completely emphasized: “Smokers who **switch completely** from cigarettes to Camel SNUS can significantly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease” was changed to “Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease.”
- Simpler language regarding chemical composition: “Scientific studies have shown that Camel SNUS contains fewer carcinogens than cigarette smoke” was changed to “Scientific studies have shown that Camel SNUS contains less of the harmful chemicals found in cigarette smoke.”
- Simpler language regarding chemical composition: “Fewer carcinogens” was changed to “Less of the harmful chemicals found in cigarette smoke.”
- Font changes to emphasize nicotine and addiction: “Like all tobacco products, Camel SNUS contains nicotine and **is addictive**” was changed to “Like all tobacco products, Camel SNUS **contains nicotine** and **is addictive**.”
- Font changes to emphasize health risk information to minors and pregnant woman: “Minors and pregnant women should never use tobacco products” was changed to “**Minors and pregnant women should never use tobacco products.**”

⁴ SNUS in all caps in advertisement.

The proposed Camel Snus print Advertising Execution 2 would depict the entire Camel Snus brand family, including the five available flavors and the two different product pouch sizes for Camel Snus Frost. RJRT intends to communicate MRTP claims for the entire Camel Snus portfolio as represented in this Application. RJRT does not intend to make any claims that are specific to any particular Camel Snus brand style. The proposed Camel Snus Advertising Execution 2 is submitted with this Application as Advertising Execution 2.

Consumers will first encounter a single page of creative material depicting a single tin of Camel Snus and a succinct advertising message: NO SMOKE LESS RISK CHOOSE SNUS.⁵ Examples for the cover pages for Camel Snus Frost and Camel Snus Robust are depicted in Figure 4-16 (Advertising Execution 2). RJRT will use the identical messaging for the other four Camel Snus brand styles.

Figure 4-16: Execution 2 Print Advertising Cover Pages



⁵ SNUS in all caps in advertisement.

The cover page of [Advertising Execution 2](#) features a photo of a closed tin of Camel Snus crushing a cigarette. Pursuant to the TCA requirement that all smokeless tobacco packages carry warning label statements, every advertisement includes one of the following warnings aligned with the RJRT warning rotation plan on both the cover page and on each page of the interior two-page spread covering at least 20% of the advertising area of each page.

1. WARNING: This product can cause mouth cancer.
2. WARNING: This product can cause gum disease and tooth loss.
3. WARNING: This product is not a safe alternative to cigarettes.
4. WARNING: Smokeless tobacco is addictive.

The interior two-page spread of Advertising Execution 2 is displayed in [Figure 4-17](#) and in [Advertising Execution 2](#).

Figure 4-17: Execution 2 Print Advertising Interior Pages

Execution 2 Print Advertising Interior Left Page

WHAT IS CAMEL SNUS?

- Camel SNUS (rhymes with "moose") is finely ground premium tobacco in a soft fleece pouch.
- Like all tobacco products, Camel SNUS contains nicotine and is addictive.

HOW IS IT DIFFERENT?

- Many smokeless tobacco products, like dip and chew, are fermented loose tobacco.
- Sure, they're smoke-free, but they can get messy and require spitting.
- Snus is different. It's smoke-free, mess-free and spit-free.
- Camel SNUS is heat-treated, not fermented, and crafted with four main ingredients: tobacco, water, salt and flavoring.

HOW DO I USE IT?

- Slide a pouch under your upper lip.
- Taste the real, premium tobacco.
- Dispose of the pouch in the trash when you are finished.
- **Switch completely** from cigarettes to Camel SNUS.

4 SIMPLE MAIN INGREDIENTS

TOBACCO + WATER + SALT + FLAVORING

Regular Large

2 POUCH SIZES
(actual size)

5 FLAVORS

15 POUCHES PER TIN

CUSTOMIZE YOUR ENJOYMENT WITH UP TO 30 MINUTES OF FLAVOR PER POUCH

SNUS

WARNING: This product can cause mouth cancer.

Execution 2 Print Advertising Interior Right Page

NO SMOKE = LESS RISK



Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer, oral cancer, respiratory disease and heart disease.



Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.



Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

I'M A SMOKER. WHY SHOULD I SWITCH?

Switching to SNUS means...

- Less of the harmful chemicals found in cigarette smoke
- Less risk for you and those around you
- No lingering smoke smell
- Hassle-free tobacco



DISCOVER MORE @ SNUSNATION.COM*

NO TOBACCO PRODUCT IS SAFE

- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start.
- Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

SNUS

*WEBSITE RESTRICTED TO AGE 21+ TOBACCO CONSUMERS

**WARNING: This product can
cause mouth cancer.**

4.5.1.3 Proposed Modified Risk Camel Snus Advertising Execution 3

Following the April 9-10, 2015 TPSAC meeting, RJRT carefully considered the comments made by FDA and TPSAC members with respect to the strength of the evidence on whether Swedish snus is or is not associated with oral cancer and heart disease. On this point, there was significant scientific discussion and differing points of view from FDA experts and TPSAC members. However, with respect to lung cancer and respiratory disease, FDA's review of the epidemiology showed very clearly that Swedish snus was not associated with lung cancer or respiratory disease ([TPSAC Meeting, April 9, 2015](#), Tr. at 196-199, 203, 206 (Dr. Lacorte)). As a result of these TPSAC member comments, RJRT created a third advertising execution based on advertising execution 2, but eliminating any modified risk claim related to risk reduction for oral cancer or heart disease. As a result of these TPSAC member comments, RJRT created a third advertising execution based on Advertising Execution 2, eliminating any modified risk claim related to risk reduction for oral cancer or heart disease.

Draft proposed Advertising Execution 3 is a three-page color print advertisement that communicates Camel Snus key product attributes and the message that switching completely to Camel Snus can greatly reduce the risk of lung cancer and respiratory disease (see [Advertising Execution 3](#)). Compared to Advertising Execution 2, RJRT made only one change to the ad: "Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS⁶ can greatly reduce their risk of lung cancer, oral cancer, respiratory disease and heart disease" was changed to "Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer and respiratory disease." In all other respects, [Advertising Execution 3](#) is identical to [Advertising Execution 2](#).

The proposed Camel Snus print [Advertising Execution 3](#) depicts the entire Camel Snus brand family, including the five available flavors and two different product pouch sizes for Camel Snus Frost. RJRT intends to communicate the modified risk claim for the entire Camel Snus portfolio as represented in this Application. RJRT does not intend to make any claims that are specific to any particular Camel Snus brand style.

The Camel Snus proposed print Advertising Execution 3 is included in this Application as [Advertising Execution 3](#).

Consumers will first encounter a single page of creative material depicting a single tin of Camel Snus and a succinct advertising message: NO SMOKE LESS RISK CHOOSE SNUS. Examples for the cover pages for Camel Snus Frost and Camel Snus Winterchill are depicted in [Figure 4-18 \(Advertising Execution 3\)](#). RJRT will use the identical messaging for the other four Camel Snus brand styles.

⁶ SNUS in all caps in advertisement.

Figure 4-18: Execution 3 Print Advertising Cover Pages



The cover page of print Advertising Execution 3 features a photo of a closed tin of Camel Snus crushing a cigarette. Pursuant to the TCA requirement that all smokeless tobacco packages carry warning label statements, every advertisement includes one of the following warnings aligned with the RJRT warning rotation plan on both the cover page and on each page of the interior two-page spread covering at least 20% of the advertising area of each page.

1. WARNING: This product can cause mouth cancer.
2. WARNING: This product can cause gum disease and tooth loss.
3. WARNING: This product is not a safe alternative to cigarettes.
4. WARNING: Smokeless tobacco is addictive.

The interior two-page spread of print Advertising Execution 3 is displayed in [Figure 4-19](#) and in [Advertising Execution 3](#).

Figure 4-19: Execution 3 Print Advertising Interior Pages

Execution 3 Print Advertising Interior Left Page

WHAT IS CAMEL SNUS?

- Camel SNUS (rhymes with "moose") is finely ground premium tobacco in a soft fleece pouch.
- Like all tobacco products, Camel SNUS contains nicotine and is addictive.

HOW IS IT DIFFERENT?

- Many smokeless tobacco products, like dip and chew, are fermented loose tobacco.
- Sure, they're smoke-free, but they can get messy and require spitting.
- Snus is different. It's smoke-free, mess-free and spit-free.
- Camel SNUS is heat-treated, not fermented, and crafted with four main ingredients: tobacco, water, salt and flavoring.

HOW DO I USE IT?

- Slide a pouch under your upper lip.
- Taste the real, premium tobacco.
- Dispose of the pouch in the trash when you are finished.
- **Switch completely** from cigarettes to Camel SNUS.

4 SIMPLE MAIN INGREDIENTS

TOBACCO + WATER + SALT + FLAVORING

2 POUCH SIZES
(actual size)

5 FLAVORS

15 POUCHES PER TIN

CUSTOMIZE YOUR ENJOYMENT WITH UP TO 30 MINUTES OF FLAVOR PER POUCH

SNUS

WARNING: This product can cause mouth cancer.

Execution 3 Print Advertising Interior Right Page

NO SMOKE = LESS RISK



Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer and respiratory disease.



Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.



Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

I'M A SMOKER. WHY SHOULD I SWITCH?

Switching to SNUS means...

- Less of the harmful chemicals found in cigarette smoke
- Less risk for you and those around you
- No lingering smoke smell
- Hassle-free tobacco



DISCOVER MORE @ SNUSNATION.COM*

NO TOBACCO PRODUCT IS SAFE

- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start.
- Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

SNUS

*WEBSITE RESTRICTED TO AGE 21+ TOBACCO CONSUMERS

**WARNING: This product can
cause mouth cancer.**

4.5.1.4 RJRT's Practice on Placing Print Advertising

RJRT only places print advertising for its tobacco products in publications that meet a variety of strict guidelines intended to ensure that the publication has adult appeal, focus and readership. Where magazine readership data are available for persons age 12 and older, 85% of the readers must be 18 or older. Where readership data are available for persons age 18 and older, the median age of the readership must be 23 years old or older. In addition, RJRT evaluates a wide array of other criteria to confirm that the publication is adult-focused, including the editorial content, the publisher's intended audience, the other products and services advertised in the publication, its method of distribution, business stability and circulation dynamics. These practices are described on RJRT's corporate website (see [RJRT Website 2016](#)).

4.5.2 Direct Mail Advertising

4.5.2.1 Proposed Modified Risk Camel Snus Direct Mail Pieces

As with the print advertising, RJRT has created a draft three-page color print folded direct mailer based on Advertising Execution 1 content that communicates to smokers Camel Snus key product attributes and the message that switching completely to Camel Snus significantly reduces the risk of lung cancer, respiratory disease, coronary heart disease and oral cancer. [Figure 4-20](#) below is a snapshot of the proposed Camel Snus direct mail modified risk advertising (see *also* [Direct Mail Execution 1](#)).

Figure 4-20: Execution 1 Direct Mail

Execution 1 Direct Mail Outside

| | | | | |
|--------|---|--|--|---|
| COUPON | COUPON | | | |
| COUPON | <p>DISCOVER MORE @ SNUSNATION.COM*</p> | | | <p>Sample A. Sample 723 Any Street Anytown, US 12345 6789 11/11/11 11:11 AM ALL INFORMATION MUST BE 2" CLEAR OF TOP OF PRODUCT ADDRESS BLOCK MUST BE 1" FROM BOTTOM OF MAILER</p> |
| COUPON | <p>WARNING: Smokeless tobacco is addictive.</p> | | | <p>WARNING: Smokeless tobacco is addictive.</p> |
| COUPON | <p>WARNING: Smokeless tobacco is addictive.</p> | | | <p>WARNING: Smokeless tobacco is addictive.</p> |

Execution 1 Direct Mail Inside

| | | | |
|---|---|--|---|
| <p>WHAT IS CAMEL SNUS?</p> <ul style="list-style-type: none"> Camel SNUS (rhymes with "moose") is finely ground premium tobacco in a soft fleece pouch. Like all tobacco products, Camel SNUS contains nicotine and is addictive. <p>HOW IS IT DIFFERENT?</p> <ul style="list-style-type: none"> Many smokeless tobacco products, like dip and chew, are fermented loose tobacco. Sure, they're smoke-free, but they can get messy and require spitting. SNUS is different. It's smoke-free, mess-free and spit-free. Camel SNUS is heat-treated, not fermented, and crafted with four main ingredients: tobacco, water, salt and flavoring. <p>HOW DO I USE IT?</p> <ul style="list-style-type: none"> Smokers who use Camel SNUS instead of cigarettes can significantly reduce their health risks from smoking. Slide a pouch under your upper lip. Taste the real, premium tobacco. Dispose of the pouch in the trash when you are finished. | <p>NO SMOKE = LESS RISK</p> <ul style="list-style-type: none"> Smokers who switch completely from cigarettes to Camel SNUS can significantly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease. Scientific studies have shown that Camel SNUS contains fewer carcinogens than cigarette smoke. Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you. <p>I'M A SMOKER. WHY WOULD I SWITCH?</p> <p>No smoke means...</p> <ul style="list-style-type: none"> No hassle No lingering smoke smell More freedom Fewer carcinogens Less risk for you and those around you | <p>NO TOBACCO PRODUCT IS SAFE</p> <ul style="list-style-type: none"> However, smokers who use Camel SNUS instead of cigarettes can significantly reduce their health risks from smoking. Like all tobacco products, Camel SNUS contains nicotine and is addictive. Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products. If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider. But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS. | <p>COUPON</p> <p>COUPON</p> <p>COUPON</p> <p>COUPON</p> |
| <p>WARNING: Smokeless tobacco is addictive.</p> | | | <p>COUPON</p> |

The proposed direct mail advertisement has an interior layout similar to the interior spread of the proposed advertising (see [Figure 4-20](#) above), including sections on “WHAT IS CAMEL SNUS⁷?”, “HOW IS IT DIFFERENT?”, “HOW DO I USE IT?”, “I’M A SMOKER. WHY WOULD I SWITCH?”, and “NO SMOKE = LESS RISK.” The imagery is intended to demonstrate to smokers, who may be reluctant to try Camel Snus, relatable situations where a smokeless tobacco product could be used rather than a cigarette. It also contains text reading “Smokers who **switch completely** from cigarettes to Camel SNUS can significantly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease.”

The proposed direct mail execution will be printed on paper that is folded in four places creating a horizontal folded self-mailer. The fold locations of the direct mail piece and the resulting location of key information were intended to increase reader understanding and comprehension of the modified risk advertising proposition.

The proposed Camel Snus direct mail execution depicts the entire current Camel Snus brand family of five available flavors and two pouch sizes for Camel Snus Frost. RJRT intends to communicate MRTP claims for the entire Camel Snus portfolio as represented in this Application. RJRT does not intend to make any claims that are specific to any particular Camel Snus brand style.

In addition, RJRT has developed proposed direct mail executions that would correspond to proposed Advertising Executions 2 and 3. These proposed direct mailers are submitted with this Application (see [Direct Mail Execution 2](#) and [Direct Mail Execution 3](#)). [Figure 4-21](#) and [Figure 4-22](#) below contains examples of images for direct mailers for Advertising Executions 2 and 3.

⁷ SNUS in all caps in direct mail execution.

Figure 4-21: Execution 2 Direct Mail

| Execution 2 Direct Mail Outside | |
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| 94 | 1.00 |
| 95 | 1.00 |
| 96 | 1.00 |
| 97 | 1.00 |
| 98 | 1.00 |
| 99 | 1.00 |
| 100 | 1.00 |

[illegible]

| |
|--|
| <p>Execution 2 Direct Mail Inside</p> |
|--|

| | | | | |
|---|--|--|--|--|
| <p>WHAT IS CAMEL SNUS?</p> <ul style="list-style-type: none"> Camel SNUS (rhymes with "moose") is finely ground premium tobacco in a soft fleece pouch. Like all tobacco products, Camel SNUS contains nicotine and is addictive. | <p>NO SMOKE = LESS RISK</p> <ul style="list-style-type: none"> Smokers who SWITCH COMPLETELY from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer, oral cancer, respiratory disease and heart disease. | <p>NO TOBACCO PRODUCT IS SAFE</p> <ul style="list-style-type: none"> Like all tobacco products, Camel SNUS contains nicotine and is addictive. Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products. If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider. But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS. |  <p>\$1.00 OFF A TIN OF SNUS</p> <p>WARNING: This product can cause mouth cancer.</p> |  <p>\$1.00 OFF A TIN OF SNUS</p> <p>WARNING: This product can cause mouth cancer.</p> |
| <p>HOW IS IT DIFFERENT?</p> <ul style="list-style-type: none"> Many smokeless tobacco products, like dip and chew, are fermented loose tobacco. Sure, they're smoke-free, but they can get messy and require spitting. Snus is different. It's smoke-free, mess-free and spit-free. Camel SNUS is heat-treated, not fermented, and crafted with four main ingredients: tobacco, water, salt and flavoring. | <p>I'M A SMOKER. WHY SHOULD I SWITCH?</p> <p>switching to SNUS means...</p> <ul style="list-style-type: none"> Less of the harmful chemicals found in cigarette smoke No lingering smoke smell Less risk for you and those around you Nicotine-free tobacco |  |  |  <p>\$1.00 OFF A TIN OF SNUS</p> <p>WARNING: This product can cause mouth cancer.</p> |

Figure 4-22: Execution 3 Direct Mail

| |
|---|
| <p>Execution 3 Direct Mail Outside</p> |
|---|

SMOKING CIGARETTES


WARNING: This product can cause mouth cancer.

SMOKING CIGARETTES

WARNING: This product can cause mouth cancer.

SMOKING CIGARETTES

WARNING: This product can cause mouth cancer.



DISCOVER MORE @ snusnation.com

4 SIMPLE MAIN INGREDIENTS

2 POUCH SIZES (Regular, Large)

5 FLAVORS

15 POUCHES PER TIN

CUSTOMIZE YOUR ENJOYMENT WITH UP TO 30 minutes OF FLAVOR PER POUCH

WARNING: This product can cause mouth cancer.

SMOKING CIGARETTES

WARNING: This product can cause mouth cancer.

SMOKING CIGARETTES

WARNING: This product can cause mouth cancer.

SMOKING CIGARETTES

WARNING: This product can cause mouth cancer.

SMOKING CIGARETTES

WARNING: This product can cause mouth cancer.

SMOKING CIGARETTES

WARNING: This product can cause mouth cancer.

SMOKING CIGARETTES

WARNING: This product can cause mouth cancer.

| |
|--------------------------------|
| Execution 3 Direct Mail Inside |
|--------------------------------|

1875' NORTHERN AFRICA
1875' NORTHERN AFRICA

WHAT IS CAMEL SNUS?

- Camel SNUS (synonymous with "moose") is finely ground premium tobacco in a soft fleece pouch.
- Like all tobacco products, Camel SNUS contains nicotine and is addictive.

HOW IS IT DIFFERENT?

- Many smokeless tobacco products, like dip and chew, are fermented loose tobacco.
- Sure, they're smoke-free, but they can get messy and require spitting.
- Snus is different. It's smoke-free, mess-free and spit-free.
- Camel SNUS is heat-treated, not fermented, and crafted with four main ingredients: tobacco, water, salt and flavoring.

HOW DO I USE IT?

- Slide a pouch under your upper lip.
- Taste the real, premium tobacco.
- Dispose of the pouch in the trash when you are finished.
- Switch completely** from cigarettes to Camel SNUS.

SNUS

NO SMOKE = LESS RISK

Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer and respiratory disease.

Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.

Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

NO TOBACCO PRODUCT IS SAFE

- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start.
- Minors and pregnant women should never use tobacco products
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

WARNING: This product can cause mouth cancer.

1875' NORTHERN AFRICA
1875' NORTHERN AFRICA

[MORE FACTS & INFO](#) [EXPRESS RETURN](#)

\$1.00 OFF
 A TIN OF **SNUS**
VALID WHILE SUPPLIES LAST

WARNING: This product can cause mouth cancer.

[MORE FACTS & INFO](#) [EXPRESS RETURN](#)

\$1.00 OFF
 A TIN OF **SNUS**
VALID WHILE SUPPLIES LAST

WARNING: This product can cause mouth cancer.

[MORE FACTS & INFO](#) [EXPRESS RETURN](#)

\$1.00 OFF
 A TIN OF **SNUS**
VALID WHILE SUPPLIES LAST

WARNING: This product can cause mouth cancer.

[MORE FACTS & INFO](#) [EXPRESS RETURN](#)

\$1.00 OFF
 A TIN OF **SNUS**
VALID WHILE SUPPLIES LAST

WARNING: This product can cause mouth cancer.

[MORE FACTS & INFO](#) [EXPRESS RETURN](#)

\$1.00 OFF
 A TIN OF **SNUS**
VALID WHILE SUPPLIES LAST

WARNING: This product can cause mouth cancer.

4.5.2.2 Mailing List Safeguards at R.J. Reynolds Tobacco Company

Similar to its policies for using print media advertising outlets, RJRT has safeguards to strictly control mailings of brand information and offers. RJRT's system of safeguards was built, and is maintained, to restrict our mailing list to age-verified 21 and older smokers who have certified that they are age 21 or over and consumers of tobacco products who want to receive RJRT's brand communications.

RJRT's direct marketing (*i.e.*, by mail or email) of its cigarette and smokeless tobacco brands is restricted to existing adult tobacco consumers, 21 years of age and older, who have requested marketing materials from RJRT or are attempting to access a RJRT brand website. RJRT refers to this as "permission-based" direct marketing. To be eligible to participate in direct marketing, the adult tobacco consumer must certify that he or she is a current consumer of tobacco products, age 21 or older, and wishes to receive tobacco brand communications and offers from RJRT. RJRT verifies the consumer's age through a third-party service if the Company did not obtain a photographic image of a valid, government-issued identification directly from the consumer. RJRT clearly identifies all direct marketing communications as intended only for receipt by adult tobacco consumers 21 and older. RJRT does not buy or rent lists that were developed for other purposes (*e.g.*, magazine-subscriber lists). RJRT's direct marketing policies are designed to avoid sending direct marketing materials to youth, non-smokers, or adult smokers who do not wish to receive brand marketing communications from RJRT. RJRT also provides a toll-free phone number and mailing address in the event that a consumer chooses to stop receiving direct marketing communications from RJRT. RJRT's program includes policies and procedures, as well as quality-control checks and data maintenance.

4.5.3 Website

RJRT maintains a website for its Camel brand tobacco products, including Camel Snus, at <https://prod2.camel.com/products>. The website serves as a platform for consumer engagement as well as providing information regarding Camel brand tobacco products. Access is restricted to users who certify that they are tobacco consumers who are 21 years of age or older. RJRT independently verifies user age prior to providing login access (*see* Section 4.5.3.2 below for a description of RJRT's website access policy).

4.5.3.1 Proposed Modified Risk Camel Snus Web Images

Following an FDA MRTP order authorizing the use of the advertising materials submitted with this Application, RJRT plans to communicate modified risk messages about Camel Snus via a restricted access website platform.

For proposed Advertising Executions 1, 2, and 3, RJRT developed proposed modified risk Camel Snus web pages that correspond identically to the modified risk messaging in the three proposed modified risk advertising claims. [Figure 4-23](#), [Figure 4-24](#), and [Figure 4-25](#) contain images for proposed web pages for Advertising Executions 1, 2, and 3 (*see* [Web Execution 1](#), [Web Execution 2](#), and [Web Execution 3](#)).

As updates in technology platforms emerge, the website may be updated from time to time in the future. The content provided here would not change, although the format may require changes to address technology evolution.

Figure 4-23: Execution 1 Web Pages

Execution 1 Web Page (Boxes Closed)

WELCOME BACK howme127

TASTE IT ALL

CAMEL SNUS NATION

ALL ABOUT SNUS COMMUNITY LESS RISK

SWAP
THE SMOKE FOR
MORE FREEDOM
& LESS RISK

CAMEL SNUS FROST

NO SMOKE = LESS RISK

SNUS IS DIFFERENT

WHY WOULD I SWITCH?

NO TOBACCO PRODUCT IS safe

- However, smokers who use Camel SNUS instead of cigarettes can significantly reduce their health risks from smoking.
- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

Retail Locator • Tobacco Rights • Site Requirements • Age Filtering • Terms of Use • Privacy Policy

SNUS

WARNING: Smokeless tobacco is addictive.

Execution 1 Web Page (Boxes Open)

WELCOME BACK
howme127

TASTE IT ALL



ALL ABOUT SNUSCOMMUNITYLESS RISK

SWAP

THE SMOKE FOR

MORE FREEDOM & LESS RISK





NO SMOKE = LESS RISK

- Smokers who **switch completely** from cigarettes to Camel SNUS can significantly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease.
- Scientific studies have shown that Camel SNUS contains fewer carcinogens than cigarette smoke.
- Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.



SNUS IS DIFFERENT

- Many smokeless tobacco products, like dip and chew, are fermented loose tobacco.
- Sure, they're smoke-free, but they can get messy and require spitting.
- Snus is different. It's smoke-free, mess-free and spit-free.
- Camel SNUS is heat-treated, not fermented, and crafted with four main ingredients: tobacco, water, salt and flavoring.



WHY WOULD I SWITCH?

No smoke means...

- No hassle
- No lingering smoke smell
- More freedom
- Fewer carcinogens
- Less risk for you and those around you

NO TOBACCO PRODUCT IS SAFE

- However, smokers who use Camel SNUS **instead of** cigarettes can significantly reduce their health risks from smoking.
- Like all tobacco products, Camel SNUS contains nicotine and is **addictive**.
- Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

Retail Locator • Tobacco Rights • Site Requirements • Age Filtering • Terms of Use • Privacy Policy

SNUS

WARNING: Smokeless tobacco is addictive.

Figure 4-24: Execution 2 Web Pages

Execution 2 Web Page (Boxes Closed)

WELCOME BACK howme127

TASTE IT ALL

CAMEL SNUS ACTION

ALL ABOUT SNUS COMMUNITY LESS RISK

NO SMOKE
LESS RISK
CHOOSE SNUS

CAMEL SNUS FROST

no smoke = LESS RISK

SNUS IS DIFFERENT

WHY WOULD I SWITCH?

no TOBACCO PRODUCT is safe

- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start.
- Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

Retail Locator • Tobacco Rights • Site Requirements • Age Filtering • Terms of Use • Privacy Policy

SNUS

WARNING: This product can cause mouth cancer.

Execution 2 Web Page (Boxes Open)

WELCOME BACK
howme127

TASTE IT ALL



ALL ABOUT SNUSCOMMUNITYLESS RISK

NO SMOKE
LESS RISK
CHOOSE SNUS





no smoke = LESS RISK

- Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer, oral cancer, respiratory disease and heart disease.
- Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.
- Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.



SNUS IS DIFFERENT

- Many smokeless tobacco products, like dip and chew, are fermented loose tobacco.
- Sure, they're smoke-free, but they can get messy and require spitting.
- Snus is different. It's smoke-free, mess-free and spit-free.
- Camel SNUS is heat-treated, not fermented, and crafted with four main ingredients: tobacco, water, salt and flavoring.



WHY WOULD I SWITCH?

Switching to SNUS means...

- Less of the harmful chemicals found in cigarette smoke
- Less risk for you and those around you
- No lingering smoke smell
- Hassle-free tobacco

no TOBACCO PRODUCT IS safe

- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start.
- Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

Retail Locator · Tobacco Rights · Site Requirements · Age Filtering · Terms of Use · Privacy Policy

SNUS

WARNING: This product can cause
mouth cancer.

Figure 4-25: Execution 3 Web Pages

Execution 3 Web Page (Boxes Closed)



NO SMOKE
LESS RISK
CHOOSE SNUS

NO SMOKE = **LESS RISK**

SNUS IS **DIFFERENT**

WHY WOULD I **SWITCH?**

NO TOBACCO PRODUCT IS SAFE

- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start.
- Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

Retail Locator · Tobacco Rights · Site Requirements · Age Filtering · Terms of Use · Privacy Policy

WARNING: This product can cause mouth cancer.

Execution 3 Web Page (Boxes Open)

NOT LOGGED IN
howme127

**TASTE IT ALL**

[ALL ABOUT SNUS](#)[COMMUNITY](#)[LESS RISK](#)

NO SMOKE LESS RISK CHOOSE SNUS





no smoke = **LESS RISK**

- Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer and respiratory disease.
- Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.
- Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.



SNUS IS **DIFFERENT**

- Many smokeless tobacco products, like dip and chew, are fermented loose tobacco.
- Sure, they're smoke-free, but they can get messy and require spitting.
- SNUS is different. It's smoke-free, mess-free and spit-free.
- Camel SNUS is heat-treated, not fermented, and crafted with four main ingredients: tobacco, water, salt and flavoring.



WHY WOULD I **SWITCH?**

Switching to SNUS means...

- Less of the harmful chemicals found in cigarette smoke
- Less risk for you and those around you
- No lingering smoke smell
- Hassle-free tobacco

no **TOBACCO PRODUCT** IS safe

- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start.
- Minors and pregnant women should never use tobacco products.**
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

[Retail Locator](#) [Tobacco Rights](#) [Site Requirements](#) [Age Filtering](#) [Terms of Use](#) [Privacy Policy](#)



WARNING: This product can cause mouth cancer.

For proposed Web Advertising Execution 1, on the initial view of the “LESS RISK” tab on the web page, consumers will see three boxes representing three reasons to “SWAP THE SMOKE FOR MORE FREEDOM AND LESS RISK,” that is, to switch completely from smoking cigarettes to using Camel Snus. By clicking on each of these boxes, the web page will reveal the depth behind the headlines:

NO SMOKE = LESS RISK: Smokers who **switch completely** from cigarettes to Camel SNUS⁸ can significantly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease. Scientific studies have shown that Camel SNUS contains fewer carcinogens than cigarette smoke. Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

SNUS IS DIFFERENT: Many smokeless tobacco products, like dip and chew, are fermented loose tobacco. Sure, they’re smoke-free, but they can get messy and require spitting. Snus is different. It’s smoke-free, mess-free and spit-free. Camel SNUS is heat-treated, not fermented, and crafted with four main ingredients: tobacco, water, salt, and flavoring.

WHY WOULD I SWITCH?: No smoke means... No hassle. No lingering smoke smell. More freedom. Fewer carcinogens. Less risk for you and those around you.

See [Figure 4-26](#) below.

⁸ SNUS in all caps in web page execution.

Figure 4-26: Execution 1 Web Page Detail



For proposed Web Advertising Execution 2, on the initial view of the “LESS RISK” tab on the web page, consumers will see a simple modified risk message: NO SMOKE LESS RISK CHOOSE SNUS⁹. Below this succinct message, consumers see three boxes representing three reasons to switch completely from smoking cigarettes to using Camel Snus. By clicking on each of these boxes, the web page will reveal the depth behind the headlines:

NO SMOKE = LESS RISK: Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease. Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke. Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.




SNUS IS DIFFERENT: Many smokeless tobacco products, like dip and chew, are fermented loose tobacco. Sure, they’re smoke-free, but they can get messy and require spitting. Snus is different. It’s smoke-free, mess-free and spit-free. Camel SNUS is heat-

⁹ SNUS in all caps in web page execution.

treated, not fermented, and crafted with four main ingredients: tobacco, water, salt, and flavoring.

WHY SHOULD I SWITCH?: Switching to SNUS means . . . Less of the harmful chemicals found in cigarette smoke. Less risk for you and those around you. No lingering smoke smell. Hassle-free tobacco.

See Figure 4-27 below.

| LESS RISK | DIFFERENT | SWITCH |
|---|--|---|
|  <p>no smoke = Less Risk</p> <ul style="list-style-type: none"> Smokers who SWITCH COMPLETELY from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer, oral cancer, respiratory disease and heart disease. Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke. Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you. |  <p>SNUS IS Different</p> <ul style="list-style-type: none"> Many smokeless tobacco products, like dip and chew, are fermented loose tobacco. Sure, they're smoke-free, but they can get messy and require spitting. Snus is different. It's smoke-free, mess-free and spit-free. Camel SNUS is heat-treated, not fermented, and crafted with four main ingredients: tobacco, water, salt and flavoring. |  <p>WHY WOULD I SWITCH?</p> <p>Switching to SNUS means...</p> <ul style="list-style-type: none"> Less of the harmful chemicals found in cigarette smoke Less risk for you and those around you No lingering smoke smell Hassle-free tobacco |

For proposed Web Advertising Execution 3, on the initial view of the “LESS RISK” tab on the web page, consumers will see a simple modified risk message: NO SMOKE LESS RISK CHOOSE SNUS¹⁰. Below this succinct message, consumers see three boxes representing three reasons to switch completely from smoking cigarettes to using Camel Snus. By clicking on each of these boxes, the web page will reveal the depth behind the headlines:

NO SMOKE = LESS RISK: Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer and respiratory disease. Scientific




¹⁰ SNUS in all caps in web page execution.

studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke. Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

SNUS IS DIFFERENT: Many smokeless tobacco products, like dip and chew, are fermented loose tobacco. Sure, they're smoke-free, but they can get messy and require spitting. Snus is different. It's smoke-free, mess-free and spit-free. Camel SNUS is heat-treated, not fermented, and crafted with four main ingredients: tobacco, water, salt, and flavoring.

WHY SHOULD I SWITCH?: Switching to SNUS means . . . Less of the harmful chemicals found in cigarette smoke. Less risk for you and those around you. No lingering smoke smell. Hassle-free tobacco.

See Figure 4-28 below.

| Figure 4-28: Execution 3 Web Page Detail | | |
|---|--|---|
| LESS RISK | DIFFERENT | SWITCH |
|  <p>no smoke = LESS RISK</p> <ul style="list-style-type: none"> Smokers who SWITCH COMPLETELY from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer and respiratory disease. Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke. Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you. |  <p>SNUS IS DIFFERENT</p> <ul style="list-style-type: none"> Many smokeless tobacco products, like dip and chew, are fermented loose tobacco. Sure, they're smoke-free, but they can get messy and require spitting. Snus is different. It's smoke-free, mess-free and spit-free. Camel SNUS is heat-treated, not fermented, and crafted with four main ingredients: tobacco, water, salt and flavoring. |  <p>WHY WOULD I SWITCH?</p> <p>Switching to SNUS means...</p> <ul style="list-style-type: none"> Less of the harmful chemicals found in cigarette smoke Less risk for you and those around you No lingering smoke smell Hassle-free tobacco |

Every proposed web page will contain the established name and four statutorily-mandated smokeless tobacco warning label statements on a rotating basis following the RJRT warning rotation plan. In addition, the proposed web pages for all proposed executions will provide consumers with health-related balancing information which includes, "No tobacco product is safe"; "Like all tobacco products, Camel SNUS contains nicotine and **is addictive**"; "Adults who

do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products”; and “If you’re a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.” See Figure 4-29 below.

Figure 4-29: Executions 1-3 Web Page Warning and Balancing Information

Execution 1 Warning and Balancing Information

no TOBACCO PRODUCT IS safe

- However, smokers who use Camel SNUS **instead of** cigarettes can significantly reduce their health risks from smoking.
- Like all tobacco products, Camel SNUS contains nicotine and **is addictive**.
- Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

[Retail Locator](#) · [Tobacco Rights](#) · [Site Requirements](#) · [Age Filtering](#) · [Terms of Use](#) · [Privacy Policy](#)

SNUS

**WARNING: Smokeless tobacco
is addictive.**

Executions 2 and 3 Warning and Balancing Information

no TOBACCO PRODUCT IS safe

- Like all tobacco products, Camel SNUS contains nicotine and **is addictive**.
- Adults who do not use or have quit using tobacco products should not start.
- Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

[Retail Locator](#) · [Tobacco Rights](#) · [Site Requirements](#) · [Age Filtering](#) · [Terms of Use](#) · [Privacy Policy](#)

SNUS

**WARNING: This product can cause
mouth cancer.**

4.5.3.2 RJRT Website Access Policy

Access to RJRT's cigarette and smokeless tobacco brand websites is restricted to existing adult tobacco consumers, 21 years of age and older. The adult tobacco consumer must certify that he or she is a current consumer of tobacco products, age 21 or over, and wishes to receive tobacco brand communications and offers from RJRT. Specifically, when an Internet user attempts to access one of the branded websites, he/she is directed to a landing page, which requires entry of a 9-digit Personal Identification Number (PID) and a password as credentials to log onto the website. Both the PID and password are obtained following verification that the adult tobacco consumer is 21 years of age or older. Age verification is accomplished either (1) by obtaining a photographic image of a valid, government-issued identification directly from the consumer or (2) through electronic age verification performed by a third-party that compares personal information provided by the individual against public records, databases, and other third-party data sources to find records that independently verify the age of the consumer. If it cannot be verified that the individual is age 21 or over, then he/she is denied access to the website. Upon the completion of the adult consumer's registration and age-verification, the consumer is issued a PID and creates a password, both of which are necessary to access the content of all RJRT tobacco brand websites.


4.5.4 Email

4.5.4.1 Proposed Modified Risk Camel Snus Email

As with the proposed Camel Snus modified risk print advertising, website, and direct mail, RJRT has created a draft execution of an email consistent with each of the three proposed modified risk advertising claims that communicate to smokers Camel Snus key product attributes and modified risk messaging that smokers who switch completely to Camel Snus can significantly reduce their risk of disease. The proposed Camel Snus direct marketing emails for Advertising Executions 1, 2, and 3 are displayed below in [Figure 4-30](#), [Figure 4-31](#), and [Figure 4-32](#) (see [Blue Email Execution 1](#), [White Email Execution 1](#), [Blue Email Execution 2](#), [White Email Execution 2](#), [Blue Email Execution 3](#), and [White Email Execution 3](#)).

Figure 4-30: Execution 1 Emails

Execution 1 Blue Email



swap
THE SMOKE FOR
**MORE FREEDOM
& LESS RISK**

NO SMOKE = LESS RISK

- Smokers who **switch completely** from cigarettes to Camel SNUS can significantly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease.
- Scientific studies have shown that Camel SNUS contains fewer carcinogens than cigarette smoke.
- Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

NO TOBACCO PRODUCT IS SAFE

- However, smokers who use Camel SNUS instead of cigarettes can significantly reduce their health risks from smoking.
- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

DISCOVER MORE @ SMOKENATION.COM

WARNING: Smokeless tobacco is addictive.

Your Personal ID is: #CEN_PID#
Log on with your Personal ID and Password. If you don't have your Password, [click here](#).
RESTRICTED & OFFERS RESTRICTED TO AGE 21+ TOBACCO CONSUMERS


(IMPORTANT) To ensure you will receive e-mail communications from R.J. REYNOLDS TOBACCO CO. please ADD US TO YOUR ADDRESS BOOK.
Do not respond by clicking Reply. Your e-mail will not be delivered.

This e-mail is being sent to you, #CEN_PassName# #CEN_LastName#, since we have confirmed that you are an age 21+ tobacco consumer and you indicated you wanted to receive e-mail communications from R.J. REYNOLDS TOBACCO CO.'s tobacco brands. It is intended for the addressee only and should not be forwarded.

P. S. We hope you enjoyed receiving this message. If you want to change your e-mail address, log on to [smokenation.com](#) and go to "My Camel" and update your information. If you do not want to receive future e-mails from R.J. REYNOLDS TOBACCO CO., this will not affect offers sent to you from R.J. REYNOLDS TOBACCO CO. through regular U.S. mail. [Click here](#) or call 1-800-334-8197.

#CEN_PID# #CEN_FirstName# #CEN_LastName#
#CEN_PassName# #CEN_LastName#
0000000
© 2014 R.J. REYNOLDS TOBACCO COMPANY P.O. Box 2555, Winston-Salem, NC 27102-2555

Execution 1 White Email



swap
THE SMOKE FOR
**MORE FREEDOM
& LESS RISK**

NO SMOKE = LESS RISK

- Smokers who **switch completely** from cigarettes to Camel SNUS can significantly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease.
- Scientific studies have shown that Camel SNUS contains fewer carcinogens than cigarette smoke.
- Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

NO TOBACCO PRODUCT IS SAFE

- However, smokers who use Camel SNUS instead of cigarettes can significantly reduce their health risks from smoking.
- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

DISCOVER MORE @ SMOKENATION.COM

WARNING: Smokeless tobacco is addictive.

Your Personal ID is: #CEN_PID#
Log on with your Personal ID and Password. If you don't have your Password, [click here](#).
RESTRICTED & OFFERS RESTRICTED TO AGE 21+ TOBACCO CONSUMERS

(IMPORTANT) To ensure you will receive e-mail communications from R.J. REYNOLDS TOBACCO CO. please ADD US TO YOUR ADDRESS BOOK.
Do not respond by clicking Reply. Your e-mail will not be delivered.

This e-mail is being sent to you, #CEN_PassName# #CEN_LastName#, since we have confirmed that you are an age 21+ tobacco consumer and you indicated you wanted to receive e-mail communications from R.J. REYNOLDS TOBACCO CO.'s tobacco brands. It is intended for the addressee only and should not be forwarded.

P. S. We hope you enjoyed receiving this message. If you want to change your e-mail address, log on to [smokenation.com](#) and go to "My Camel" and update your information. If you do not want to receive future e-mails from R.J. REYNOLDS TOBACCO CO., this will not affect offers sent to you from R.J. REYNOLDS TOBACCO CO. through regular U.S. mail. [Click here](#) or call 1-800-334-8197.

#CEN_PID# #CEN_FirstName# #CEN_LastName#
#CEN_PassName# #CEN_LastName#
0000000
© 2014 R.J. REYNOLDS TOBACCO COMPANY P.O. Box 2555, Winston-Salem, NC 27102-2555

Execution 1 Blue Email Detail

NO SMOKE = LESS RISK

- Smokers who **switch completely** from cigarettes to Camel SNUS can significantly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease.
- Scientific studies have shown that Camel SNUS contains fewer carcinogens than cigarette smoke.
- Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.


Execution 1 White Email Detail

NO SMOKE = LESS RISK

- Smokers who **switch completely** from cigarettes to Camel SNUS can significantly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease.
- Scientific studies have shown that Camel SNUS contains fewer carcinogens than cigarette smoke.
- Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

Figure 4-31: Execution 2 Emails

Execution 2 Blue Email



SWAP
THE SMOKE FOR
**MORE FREEDOM
& LESS RISK**

NO SMOKE = LESS RISK

- Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer, oral cancer, respiratory disease and heart disease.
- Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.
- Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

NO TOBACCO PRODUCT IS SAFE

- However, smokers who use Camel SNUS instead of cigarettes can significantly reduce their health risks from smoking.
- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

DISCOVER MORE @ SNUSNATION.COM

WARNING: Smokeless tobacco is addictive.

Your Personal ID is: [RCSN_PDM](#)
Log on with your Personal ID and Password. If you don't have your Password, [click here](#).
*WEBSITE & OFFERS RESTRICTED TO AGE 21+ TOBACCO CONSUMERS

IMPORTANT: To ensure you will receive e-mail communications from R.J. REYNOLDS TOBACCO CO. please [ADD US TO YOUR ADDRESS BOOK](#).


Do not respond by clicking Reply. Your e-mail will not be delivered.

This e-mail is being sent to you, [RCSN_PDM@RCSN_SNAName_Mail](#), since we have confirmed that you are an age 21+ tobacco consumer and you indicated you wanted to receive e-mail communications from R.J. REYNOLDS TOBACCO CO.'s tobacco brands. It is intended for the addressee only and should not be forwarded.

P. S. We hope you enjoyed receiving this message. If you want to change your e-mail address login to [SNUSNATION.COM](#) and go to "My Camel" and update your information. If you do not want to receive future e-mails from R.J. REYNOLDS TOBACCO CO. (this will not affect offers sent to you from R.J. REYNOLDS TOBACCO CO. through regular U.S. mail) [Click here](#) or call 1-800-334-8197.

RCSN_PDM@RCSN_SNAName_Mail
RCSN_PDM@RCSN_SNAName_Mail
0000000
© 2014 R.J. REYNOLDS TOBACCO COMPANY P.O. Box 2959 Winston-Salem, NC 27102-2959

Execution 2 White Email



SWAP
THE SMOKE FOR
**MORE FREEDOM
& LESS RISK**

NO SMOKE = LESS RISK

- Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer, oral cancer, respiratory disease and heart disease.
- Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.
- Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

NO TOBACCO PRODUCT IS SAFE

- However, smokers who use Camel SNUS instead of cigarettes can significantly reduce their health risks from smoking.
- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

DISCOVER MORE @ SNUSNATION.COM

WARNING: Smokeless tobacco is addictive.

Your Personal ID is: [RCSN_PDM](#)
Log on with your Personal ID and Password. If you don't have your Password, [click here](#).
*WEBSITE & OFFERS RESTRICTED TO AGE 21+ TOBACCO CONSUMERS

IMPORTANT: To ensure you will receive e-mail communications from R.J. REYNOLDS TOBACCO CO. please [ADD US TO YOUR ADDRESS BOOK](#).

Do not respond by clicking Reply. Your e-mail will not be delivered.

This e-mail is being sent to you, [RCSN_PDM@RCSN_SNAName_Mail](#), since we have confirmed that you are an age 21+ tobacco consumer and you indicated you wanted to receive e-mail communications from R.J. REYNOLDS TOBACCO CO.'s tobacco brands. It is intended for the addressee only and should not be forwarded.

P. S. We hope you enjoyed receiving this message. If you want to change your e-mail address login to [SNUSNATION.COM](#) and go to "My Camel" and update your information. If you do not want to receive future e-mails from R.J. REYNOLDS TOBACCO CO. (this will not affect offers sent to you from R.J. REYNOLDS TOBACCO CO. through regular U.S. mail) [Click here](#) or call 1-800-334-8197.

RCSN_PDM@RCSN_SNAName_Mail
RCSN_PDM@RCSN_SNAName_Mail
0000000
© 2014 R.J. REYNOLDS TOBACCO COMPANY P.O. Box 2959 Winston-Salem, NC 27102-2959

Execution 2 Blue Email Detail

NO SMOKE = LESS RISK



Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer, oral cancer, respiratory disease and heart disease.



Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.



Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

Execution 2 White Email Detail

NO SMOKE = LESS RISK



Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer, oral cancer, respiratory disease and heart disease.



Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.



Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

Figure 4-32: Execution 3 Emails

Execution 3 Blue Email



SWAP
THE SMOKE FOR
**more Freedom
& Less Risk**

NO SMOKE = LESS RISK

- Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer and respiratory disease.
- Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.
- Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

NO TOBACCO PRODUCT IS SAFE

- However, smokers who use Camel SNUS instead of cigarettes can significantly reduce their health risks from smoking.
- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

DISCOVER MORE @ SNUSNATION.COM

WARNING: Smokeless tobacco is addictive.

Your Personal ID is: #CSN_PID#
Log on with your Personal ID and Password. If you don't have your Password, [click here](#).
*WEBSITE & OFFERS RESTRICTED TO AGE 21+ TOBACCO CONSUMERS

IMPORTANT: To ensure you will receive e-mail communications from R.J. REYNOLDS TOBACCO CO. please [ADD US TO YOUR ADDRESS BOOK](#).

Do not respond by clicking Reply. Your e-mail will not be delivered.

This e-mail is being sent to you, #CSN_PID#, #CSN_FirstName# #CSN_LastName#, since we have confirmed that you are an age 21+ tobacco consumer and you indicated you wanted to receive e-mail communications from R.J. REYNOLDS TOBACCO CO.'s tobacco brands. It is intended for the addressee only and should not be forwarded.

P. S. We hope you enjoyed receiving this message. If you want to change your e-mail address, log on to [mycamel.com](#) and go to "My Camel" and update your information. If you do not want to receive future e-mails from R.J. REYNOLDS TOBACCO CO. (this will not affect offers sent to you from R.J. REYNOLDS TOBACCO CO. through regular U.S. mail) [Click here](#) or call 1-800-224-8107.

#CSN_PID# #CSN_FirstName# #CSN_LastName#
© 2014 R.J. REYNOLDS TOBACCO COMPANY P.O. Box 2355, Winston-Salem, NC 27102-2355

Execution 3 White Email



SWAP
THE SMOKE FOR
**more Freedom
& Less Risk**

NO SMOKE = LESS RISK

- Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer and respiratory disease.
- Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.
- Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

NO TOBACCO PRODUCT IS SAFE

- However, smokers who use Camel SNUS instead of cigarettes can significantly reduce their health risks from smoking.
- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

DISCOVER MORE @ SNUSNATION.COM

WARNING: Smokeless tobacco is addictive.

Your Personal ID is: #CSN_PID#
Log on with your Personal ID and Password. If you don't have your Password, [click here](#).
*WEBSITE & OFFERS RESTRICTED TO AGE 21+ TOBACCO CONSUMERS

IMPORTANT: To ensure you will receive e-mail communications from R.J. REYNOLDS TOBACCO CO. please [ADD US TO YOUR ADDRESS BOOK](#).

Do not respond by clicking Reply. Your e-mail will not be delivered.

This e-mail is being sent to you, #CSN_PID#, #CSN_FirstName# #CSN_LastName#, since we have confirmed that you are an age 21+ tobacco consumer and you indicated you wanted to receive e-mail communications from R.J. REYNOLDS TOBACCO CO.'s tobacco brands. It is intended for the addressee only and should not be forwarded.

P. S. We hope you enjoyed receiving this message. If you want to change your e-mail address, log on to [mycamel.com](#) and go to "My Camel" and update your information. If you do not want to receive future e-mails from R.J. REYNOLDS TOBACCO CO. (this will not affect offers sent to you from R.J. REYNOLDS TOBACCO CO. through regular U.S. mail) [Click here](#) or call 1-800-224-8107.

#CSN_PID# #CSN_FirstName# #CSN_LastName#
© 2014 R.J. REYNOLDS TOBACCO COMPANY P.O. Box 2355, Winston-Salem, NC 27102-2355

Execution 3 Blue Email Detail

NO SMOKE = LESS RISK



Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer and respiratory disease.



Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.



Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

Execution 3 White Email Detail

NO SMOKE = LESS RISK



Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer and respiratory disease.



Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.



Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

Every proposed email communication will contain the established name and the four statutorily-mandated warning label statements on a rotating basis following the RJRT warning rotation plan. In addition, the proposed emails for all proposed executions will provide consumers with health-related balancing information which includes, “No tobacco product is safe”; “Like all tobacco products, Camel SNUS¹¹ contains nicotine and is addictive”; “Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products”; and “If you’re a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.” See [Figure 4-33](#) below.

¹¹ SNUS in all caps in email executions.

Figure 4-33: Executions 1-3 Email Warning and Balancing Information

The graphic is a screenshot of an email. The top section has a dark blue background with white and orange text. It starts with the heading "NO TOBACCO PRODUCT IS SAFE" in white. Below this is a bulleted list of five points in white text. At the bottom of this section is an orange button with white text that says "DISCOVER MORE @ SNUSNATION.COM*". Below the blue section is a white section with a large, bold, black warning message. The word "SNUS" is written in small white letters on the left side of the blue background.

NO TOBACCO PRODUCT IS SAFE

- However, smokers who use Camel SNUS instead of cigarettes can significantly reduce their health risks from smoking.
- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start. Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

DISCOVER MORE @ SNUSNATION.COM*

SNUS

WARNING: Smokeless tobacco is addictive.

4.5.4.2 Email Safeguards and Policy

RJRT's direct marketing (*i.e.*, by mail or email) of its cigarette and smokeless tobacco brands is restricted to existing adult tobacco consumers, 21 years of age and older, who have requested marketing materials from RJRT or are attempting to access an RJRT brand website. RJRT refers to this as "permission-based" direct marketing. To be eligible to participate in direct marketing, the adult tobacco consumer must certify that he or she is a current consumer of tobacco products, age 21 or older, and wishes to receive tobacco brand communications and offers from RJRT. RJRT verifies the consumer's age through a third-party service if the Company did not obtain a photographic image of a valid, government-issued identification directly from the consumer. RJRT clearly identifies all direct marketing communications as intended only for

receipt by adult tobacco consumers 21 and older. RJRT does not buy or rent lists that were developed for other purposes (*e.g.*, magazine-subscriber lists). RJRT's direct marketing policies are designed to avoid sending direct marketing materials to youth, non-smokers, or adult smokers who do not wish to receive brand marketing communications from RJRT. RJRT also provides a toll-free phone number and mailing address in the event that a consumer chooses to stop receiving direct marketing communications from RJRT. RJRT's program includes policies and procedures, as well as quality-control checks and data maintenance.

All RJRT brand emails clearly indicate that they are from a tobacco company and that they are restricted to tobacco consumers 21 and older. The emails display the name and Personal ID (database identifier) of the intended recipient. These emails always contain RJRT's contact information and instructions on how to opt-out from receiving emails from RJRT's Brands. RJRT acts on all such requests.

RJRT has procedures in place to help ensure that our emails comply with applicable restrictions, regulations and laws. In addition, RJRT follows the Direct Marketing Association's email identification and authentication protocols; RJRT complies with CAN SPAM ACT (Controlling the Assault of Non-Solicited Pornography And Marketing Act) requirements; and, through our email deployment supplier, we work with Internet Service Providers in support of their ongoing initiatives to help stop spam and phishing.

4.5.5 Consumer Engagement

4.5.5.1 Proposed Consumer Engagement Handout

As with the above proposed Camel Snus modified risk advertising executions, RJRT has created a draft execution of a handout that communicates Camel Snus key product attributes and modified risk messaging that smokers who switch completely to Camel Snus can significantly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease. [Figure 4-34](#), [Figure 4-35](#), and [Figure 4-36](#) below depict electronic images of the proposed consumer engagement handout for Advertising Executions 1, 2, and 3 (see [Consumer Engagement Handout Execution 1](#), [Consumer Engagement Handout Execution 2](#), and [Consumer Engagement Handout Execution 3](#)).

RJRT has representatives who, on behalf of the Company, engage adult 21 years of age or older smokers face-to-face in adult-only facilities and at retail. In the course of conversations regarding Camel Snus brand styles, the proposed consumer engagement handouts with modified risk messaging would be provided to the smoker. The RJRT representatives will not engage in conversations regarding modified risk beyond providing any FDA authorized materials, including a restricted-access website.

The proposed consumer engagement handout is printed on paper and folded in two places creating a tri-fold brochure. The mechanics of the fold locations of the consumer engagement handout and the resulting location of Camel Snus product information is intended to increase consumer understanding and comprehension of the modified risk messaging.

Figure 4-34: Execution 1 Consumer Engagement Handout

Execution 1 Consumer Engagement Handout Outside

**I'M A SMOKER.
WHY WOULD I SWITCH?**

No smoke means...

- No hassle
- No lingering smoke smell
- More freedom
- Fewer carcinogens
- Less risk for you and those around you



SNUS

WARNING:
Smokeless tobacco
is addictive.



DISCOVER MORE
@ SNUSNATION.COM*

SNUS

WARNING:
Smokeless tobacco
is addictive.

V2014

**SWAP
THE SMOKE FOR
MORE
FREEDOM
& LESS
RISK**



SNUS

WARNING:
Smokeless tobacco
is addictive.

Execution 1 Consumer Engagement Handout Inside

NO SMOKE = LESS RISK



Smokers who **switch completely** from cigarettes to Camel SNUS can significantly reduce their risk of lung cancer, oral cancer, respiratory disease, and heart disease.



Scientific studies have shown that Camel SNUS contains fewer carcinogens than cigarette smoke.



Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

SNUS

WARNING: Smokeless tobacco is addictive.

**NO TOBACCO
PRODUCT IS SAFE**

- However, smokers who use Camel SNUS **instead of** cigarettes can significantly reduce their health risks from smoking.
- Like all tobacco products, Camel SNUS contains nicotine and **is addictive**.
- Adults who do not use or have quit using tobacco.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

Figure 4-35: Execution 2 Consumer Engagement Handout

Execution 2 Consumer Engagement Handout Outside

**I'M A SMOKER.
WHY SHOULD I SWITCH?**

Switching to SNUS means...

- Less of the harmful chemicals found in cigarette smoke
- Less risk for you and those around you
- No lingering smoke smell
- Hassle-free tobacco



SNUS

WARNING:
Smokeless tobacco
is addictive.



DISCOVER MORE
@ SNUSNATION.COM*

SNUS

WARNING:
Smokeless tobacco
is addictive.

V2

**NO SMOKE
LESS
RISK
CHOOSE
SNUS**



SNUS

WARNING:
Smokeless tobacco
is addictive.

Execution 2 Consumer Engagement Handout Inside

NO SMOKE = LESS RISK



Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer, oral cancer, respiratory disease and heart disease.



Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.



Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

SNUS

WARNING: Smokeless tobacco is addictive.

**NO TOBACCO
PRODUCT IS SAFE**

- Like all tobacco products, Camel SNUS **contains nicotine and is addictive.**
- Adults who do not use or have quit using tobacco products should not start.
- **Minors and pregnant women should never use tobacco products.**
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

Figure 4-36: Execution 3 Consumer Engagement Handout

Execution 3 Consumer Engagement Handout Outside

I'M A SMOKER. WHY SHOULD I SWITCH?

Switching to SNUS means...

- Less of the harmful chemicals found in cigarette smoke
- Less risk for you and those around you
- No lingering smoke smell
- Hassle-free tobacco



SNUS

WARNING:
Smokeless tobacco
is addictive.



DISCOVER MORE
@ SNUSNATION.COM*

SNUS

WARNING:
Smokeless tobacco
is addictive.

V1

**NO SMOKE
LESS
RISK
CHOOSE
SNUS**



SNUS

WARNING:
Smokeless tobacco
is addictive.

Execution 3 Consumer Engagement Handout Inside

NO SMOKE = LESS RISK



Smokers who **SWITCH COMPLETELY** from cigarettes to Camel SNUS can greatly reduce their risk of lung cancer and respiratory disease.



Scientific studies have shown that Camel SNUS contains less of the harmful chemicals than cigarette smoke.



Camel SNUS is smoke-free, so there are no secondhand smoke risks for those around you.

SNUS

WARNING: Smokeless tobacco is addictive.

NO TOBACCO PRODUCT IS SAFE

- Like all tobacco products, Camel SNUS contains nicotine and is addictive.
- Adults who do not use or have quit using tobacco products should not start.
- Minors and pregnant women should never use tobacco products.
- If you're a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider.
- But if you're not going to quit using tobacco products, you should think about switching to Camel SNUS.

Every proposed consumer engagement handout will contain the established name and the four statutorily-mandated smokeless tobacco warning label statements on a rotating basis following the RJRT warning rotation plan. In addition, consistent with RJRT’s “Guiding Principles and Beliefs” (see [RJRT Website 2016](#)), the proposed consumer engagement handouts for all proposed executions will provide consumers with health-related balancing information which includes:

- Execution 1: NO TOBACCO PRODUCT IS SAFE. However, smokers who use Camel SNUS¹² **instead of** cigarettes can significantly reduce their health risks from smoking. Like all tobacco products, Camel SNUS contains nicotine and **is addictive**. Adults who do not use or have quit using tobacco. But if you’re not going to quit using tobacco products, you should think about switching to Camel SNUS.
- Executions 2 and 3: NO TOBACCO PRODUCT IS SAFE. Like all tobacco products, Camel SNUS **contains nicotine** and **is addictive**. Adults who do not use or have quit using tobacco products should not start. **Minors and pregnant women should never use tobacco products**. If you’re a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider. But if you’re not going to quit using tobacco products, you should think about switching to Camel SNUS.

See Figure 4-37 below.

Figure 4-37: Executions 1-3 Consumer Engagement Handout Balancing Information

| Execution 1 | Executions 2 and 3 |
|---|--|
| <p>NO TOBACCO PRODUCT IS SAFE</p> <ul style="list-style-type: none"> • However, smokers who use Camel SNUS instead of cigarettes can significantly reduce their health risks from smoking. • Like all tobacco products, Camel SNUS contains nicotine and is addictive. • Adults who do not use or have quit using tobacco. • But if you’re not going to quit using tobacco products, you should think about switching to Camel SNUS. | <p>NO TOBACCO PRODUCT IS SAFE</p> <ul style="list-style-type: none"> • Like all tobacco products, Camel SNUS <u>contains nicotine</u> and <u>is addictive</u>. • Adults who do not use or have quit using tobacco products should not start. • <u>Minors and pregnant women should never use tobacco products</u>. • If you’re a smoker concerned about the health risks from smoking, the best choice is to quit. A good place to begin is talking with a healthcare provider. • But if you’re not going to quit using tobacco products, you should think about switching to Camel SNUS. |

¹² SNUS in all caps in Consumer Engagement Handout.

4.5.5.2 Consumer Engagement Policy

RJRT's adult tobacco consumer engagement activities are restricted to adult tobacco consumers, 21 years of age and older, who are willing to participate in discussion regarding RJRT's cigarette and smokeless tobacco brands. The RJRT consumer engagement representative verbally verifies that the adult consumer is a current tobacco consumer and verifies the individual's age by reviewing the individual's valid, government-issued ID before any brand communication occurs.

4.6 Sample Product Labels and Labeling

An MRTP application must include sample product labels and labeling. In the [FDA MRTP Draft Guidance 2012](#), FDA recommends that applicants submit of copies of each package label variation (including inserts and onserts) proposed to be used for the MRTP, except that copies of package label variations for each health warning required by law may be omitted. RJRT has not developed any new product labels or labeling that are different from the labels and labeling on current Camel Snus products presently being sold commercially. In connection with this Application, RJRT is not proposing any changes to any Camel Snus product labels or labeling and has not developed any product labels or labeling with modified risk claims.

In accordance with the Agency's recommendations, RJRT submits copies of the labels which have been developed by the time of the filing of this Application.

4.6.1 Camel Snus Frost TP0000554 [SKU 134458301]

[Camel Snus Frost Front Label.jpg](#)



[Camel Snus Frost Back Label.jpg](#)



4.6.2 Camel Snus Frost Large TP0007508 [SKU 134530301]

Camel Snus Frost Large Front Label.jpg



Camel Snus Frost Large Back Label.jpg



4.6.3 Camel Snus Mellow TP0000555 [SKU 134497301]

Camel Snus Mellow Front Label.jpg



Camel Snus Mellow Back Label.jpg



4.6.4 Camel Snus Mint TP0007509 [SKU 134532301]

Camel Snus Mint Front Label.jpg



Camel Snus Mint Back Label.jpg



4.6.5 Camel Snus Robust TP0000557 [SKU 134524301]

Camel Snus Robust Front Label.jpg



Camel Snus Robust Back Label.jpg



4.6.6 Camel Snus Winterchill TP0000556 [SKU 134511301]

Camel Snus Winterchill Front Label.jpg



Camel Snus Winterchill Back Label.jpg



4.7 Composite Table of Proposed Modified Risk Advertising Platforms and Executions

| Advertising Platform | Execution / Electronic File Name |
|---------------------------------------|--|
| Modified Risk Advertising Execution 1 | |
| Print Advertisement | Advertising Execution 1 Advertising Execution 1 Rotating Warnings |
| Direct Mail | Direct Mail Execution 1 |
| Website | Web Execution 1 |
| Email | Blue Email Execution 1 White Email Execution 1 |
| Consumer Engagement | Consumer Engagement Handout Execution 1 |
| Modified Risk Advertising Execution 2 | |
| Print Advertisement | Advertising Execution 2 |
| Direct Mail | Direct Mail Execution 2 |
| Website | Web Execution 2 |
| Email | Blue Email Execution 2 White Email Execution 2 |
| Consumer Engagement | Consumer Engagement Handout Execution 2 |
| Modified Risk Advertising Execution 3 | |
| Print Advertisement | Advertising Execution 3 |
| Direct Mail | Direct Mail Execution 3 |
| Website | Web Execution 3 |
| Email | Blue Email Execution 3 White Email Execution 3 |
| Consumer Engagement | Consumer Engagement Handout Execution 3 |