RAI Services Company

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Hans Rosenfeldt, Ph.D.
Deputy Director, Division of Nonclinical Science
Deirdre Kittner, Ph.D., MPH
Deputy Director, Division of Population Health Science
Office of Science
Food and Drug Administration
Center for Tobacco Products
Document Control Center (DCC)
Building 71, Room G335
10903 New Hampshire Avenue
Silver Spring, MD 20993-0002

Re: PARTIAL RESPONSE (DEFICIENCY 5) to AUGUST 10, 2018 ADVICE/INFORMATION REQUEST for PM0000427-PM0000432 and MR0000068-MR0000073

Dear Drs. Rosenfeldt and Kittner:

RAI Services Company ("RAIS")[1] hereby submits the following, on behalf of R.J. Reynolds Tobacco Company ("RJRT"), in response to the United States Food and Drug Administration's ("FDA") Center for Tobacco Products ("CTP") August 10, 2018, ADVICE/INFORMATION REQUEST letter regarding RAIS's submission of Premarket Tobacco Applications ("PMTAs") and Applications Seeking a Modified Risk Tobacco Product Order ("MRTP Applications"), submitted under Section 910(b) and Section 911(d) of the Food, Drug, and Cosmetic Act ("FDCA"), respectively, on March 30, 2017 for the following tobacco products:

- PM0000427/MR0000072, Camel Snus Robust
- PM0000428/MR0000070, Camel Snus Mellow

[1] RAI Services Company ("RAIS") bears primary responsibility for regulatory compliance for Reynolds American Inc.'s operating companies, including R.J. Reynolds Tobacco Company ("RJRT"), American Snuff Co., LLC ("ASC"), Santa Fe Natural Tobacco Company, Inc. ("SFNTC"), and R.J. Reynolds Vapor Company ("RJRV"). References to RAIS in this letter refer to itself and RJRT where applicable.

- PM0000429/MR0000069, Camel Snus Frost Large
- PM0000430/MR0000071, Camel Snus Mint
- PM0000431/MR0000073, Camel Snus Winterchill
- PM0000432/MR0000068, Camel Snus Frost

This response refers to Deficiency Five (5) in the aforementioned ADVICE/INFORMATION REQUEST. Deficiencies not addressed in this submission will be covered in separate responses. In this response, we have repeated CTP's requests, verbatim and in bold italics, followed by RAIS's response.

Please note that the enclosed response may contain confidential commercial and non-public trade secret information belonging to RAIS, RJRT, or RJRT's vendors. All such confidential and trade secret information is exempt from public disclosure under § 301(j) and § 906(c) of the FDCA, 5 U.S.C. § 552(b)(4), 18 U.S.C. § 1905, and 21 C.F.R. § 20.61 and any similar or related laws and regulations. RAIS and RJRT respectfully request that FDA maintain the confidentiality of this information.

Should you have any questions or require any additional information, please contact me at your earliest convenience.

Respectfully submitted,

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5. ***All of your MRTPAs/PMTAs contain several discrepancies or lack information about the ingredients listed in Section 3.2; and this information as well as clarification of any discrepancies is necessary to fully characterize the composition of the new products and evaluate their risks. Provide explanations and information for the following:***

   a. ***Your MRTPAs/PMTAs list the*** (b) (4) ***tobacco weights of the products as*** (b) (4) ***per portion for MR0000068/PM0000432, MR0000070/PM0000428, and MR0000071/PM0000430 (Section 3.2.1.3.1; Table 3.2-2 to Table 3.2-7) and*** (b) (4) ***per portion for MR0000069/PM0000429, MR0000072/PM0000427, and MR0000073/PM0000431 (Section 3.1.5; Table 3.1-3). However, in other parts of your applications, the tobacco weights are reported at different values.*** (b) (4) ***. In order to fully characterize each product, provide the absolute tobacco weight quantities recorded as mass per unit of use.***

   b. ***Your MRTPAs/PMTAs list that all the new products contain*** (b) (4) ***, which is the most abundant ingredient other than tobacco, equivalent to*** (b) (4) ***of the total product weight.*** (b) (4) ***. Provide an explanation for the discrepancies in the quantities of*** (b) (4) ***and total quantities of ingredients in the finished products and clarify the correct ingredient quantities to fully characterize the composition of the new products.***

   c. ***MR0000068/PM0000432 and MR0000069/PM0000429 indicate that the new products contain the complex ingredient "*** (b) (4) ***." This complex ingredient is made up of more than one chemical substance, which were listed as weight percent; however, many of the chemical substances add up to over 100% (i.e., the sum of the subcomponents of the complex ingredient exceeds 100%). Clarify the quantity of each ingredient in the complex ingredient and provide the individual masses per unit use of all ingredients in the complex ingredient listed for each of the new products.***

   d. ***All of your MRTPAs/PMTAs list the individual ingredients comprising the flavor complex ingredients.*** (b) (4) ***Providing the identities and quantities of single ingredients comprising the complex ingredients allows FDA to fully characterize the composition and evaluate the risks of your products. This information is necessary for a comprehensive review of your tobacco products.*** (b) (4) ***one approach to providing ingredient information would be to request that your supplier submit a Tobacco Product Master File (TPMF) and authorize you to reference the information in the TPMF to support your applications.***

e. ***All of your MRTPAs/PMTAs identify but do not fully characterize the components of the container closure system (e.g., metal lid, metal base, interior coating, interior seal, shrink band) but lack ingredient information for these materials. In order for FDA to evaluate the composition of the packaging materials in each product, and evaluate the risks of your products, additional information about the packaging is needed. Thus, to fully characterize the composition of each product, provide detailed packaging material information, including a detailed ingredients list, for the metal containers, interior coating and seal, and shrink band.***

f. ***All of your MRTPAs/PMTAs contain purity, certificate of analysis (COA), and physical properties for the ingredients added to the tobacco. In MR0000073/PM0000431, Camel Snus Winterchill contains*** (b) (4) ***as a flavor ingredient added to tobacco. Your applications do not contain the COA and purity specifications for this ingredient. Without this information, we cannot determine whether the ingredient*** (b) (4) ***conforms to the specifications and ensure that the new product is manufactured consistently. Provide the COA and purity for*** (b) (4) ***to fully characterize the composition of the new product.***

<u>RAIS RESPONSE TO DEFICIENCY 5a</u>

RAIS understands FDA's request to be to provide the absolute tobacco weights for the Camel Snus products. The absolute tobacco weight, described as "total tobacco weight" by RAIS in associated amendments, may be found in Table 1.

RAIS would like to take the opportunity to clarify that (b) (4) (b) (4)

The term "total tobacco weight," utilized in section 3.1.5; Table 3.1-3, reflects exclusively tobacco, with no additional ingredients or additives. In order for FDA to better understand these products, RAIS provides a characteristic comparison summary for the Camel Snus products in Table 1. This table lists the mass (mg/unit) of tobacco, ingredients and additives, (b) (4)), fleece (pouch material), and the final portion mass for the Camel Snus products.

To further clarify, FDA states, "Your MRTPAs/PMTAs list the (b) (4) " tobacco weights of the products as (b) (4) per portion for MR0000068/PM0000432, MR0000070/PM0000428, and MR0000071/PM0000430 (Section 3.2.1.3.1; Table 3.2-2 to Table 3.2-7) and (b) (4) per portion for MR0000069/PM0000429, MR0000072/PM0000427, and MR0000073/PM0000431 (Section 3.1.5; Table 3.1-3)." These are the values represented in the column labeled (b) (4) of Table 1, which RAIS notes are the (b) (4) .

RAIS would like to clarify and explain the language (b) (4) [redacted].

Table 1: Characteristics Comparison Summary of Target Specifications					
Product	Total Tobacco Weight (mg/unit)	Ingredients and Additives (mg/unit)¥	(b) (4) (mg/unit)	Fleece (mg/unit)	Total Unit Portion Mass (mg)
Camel Snus Frost	(b) (4) [redacted]				
Camel Snus Frost Large					
Camel Snus Mellow					
Camel Snus Mint					
Camel Snus Robust					
Camel Snus Winterchill					

(b) (4) [redacted]

RAIS RESPONSE TO DEFICIENCY 5b

RAIS understands FDA's request to (b) (4) [redacted]

(b) (4) [redacted]

(b) (4) [redacted] RAIS notes that Agency guidance (FDA 2018)[2] provides that the quantity of a given ingredient may be calculated

(b) (4) [redacted]

"based on the added amounts and adjusting for known or intended losses." It is of note RAIS' approach in which we adjust for (b) (4) during the (b) (4) process consistently and reliably produces finished product that falls within the specifications for (b) (4) content for the Camel Snus products. (b) (4)
(b) (4)

Table 2 provides the previously submitted locations of the tables with the quantities of ingredients added to the Camel Snus products that are the subject of this submission.

Table 2: Previous Locations for Ingredient Tables in MRTPA/PMTA	
Product	**Table Header in MRTPA/PMTA**
Camel Snus Frost	Table 3.2-2: Camel Snus Frost (600mg) Complete Ingredient List
Camel Snus Frost Large	Table 3.2-5 Camel Snus Frost Large (1000mg) Complete Ingredient List
Camel Snus Mellow	Table 3.2-4: Camel Snus Mellow (600mg) Complete Ingredient List
Camel Snus Mint	Table 3.2-3: Camel Snus Mint (600mg) Complete Ingredient List
Camel Snus Robust	Table 3.2-7: Camel Snus Robust (1000mg) Complete Ingredient List
Camel Snus Winterchill	Table 3.2-6: Camel Snus Winterchill (1000mg) Complete Ingredient List

RAIS RESPONSE TO DEFICIENCY 5c

FDA requests clarification on the weight percent of ingredients in the complex purchased ingredient (b) (4) used in the Camel Snus products of Camel Snus Frost Large and Camel Snus Frost. (b) (4) Because of these agreements, RAIS is able to transmit to FDA such trade secret formulations as part of RAIS' various product submissions.

(b) (4)

[redacted]

RAIS RESPONSE TO DEFICIENCY 5d

RAIS understands FDA's request to be for information regarding individual ingredients comprising fleece pouch material which is a complex purchased ingredient. Fleece is a dry-laid nonwoven material made from viscose fiber (b) (4) (b) (4) Table 3 below describes the appendices associated with full ingredient disclosures including processing aids from each fleece supplier.

Table 3: Camel Snus Fleece Ingredients & MSDS			
Appended Files	Name	Supplier	Corresponding Products
(b) (4)			

RAIS RESPONSE TO DEFICIENCY 5e

RAIS understands FDA's request to be for packaging material information, including an ingredient list for the metal containers, interior coating and seal, and shrink band, for Camel Snus container closure system components. The metal containers are fabricated out of tin-plat (b) (4) an overlaid tin layer) that is commonly used in various food containers. (b) (4)

Table 4: Packaging Material Information for Camel Snus Container Closure System		
Appended Files	Function	Supplier
d05e-shrinkband-ingredient-disclosure	(b) (4)	
d05e-interior-can-coating-disclosure-crown		
d05e-interior-can-coating-disclosure-jl		
d05e-plastisol-disclosure-crown		
d05e-plastisol-disclosure-jl		
(b) (4)		
d05e-metal-container-disclosure-(b) (4)		

RAIS RESPONSE TO DEFICIENCY 5f

RAIS understands FDA's request to be for the certificate of analysis (COA) and purity information for (b) (4) in the Camel Snus Winterchill. The COA for (b) (4), used in the Camel Snus Winterchill, is provided in d05f(b) (4) -coas. The purity information for (b) (4) is provided in Table 5. RAIS notes this information was previously provided to FDA in section 3.2.1.5.2 of the July 23, 2018 amendment.

Table 5: (b) (4)	Ingredient Information
(b) (4)	