RAI Services Company

Michael W. Ogden, Ph.D.
Senior Vice President
Scientific & Regulatory Affairs
Winston-Salem, NC 27101
336-741-5787
Fax: 336-728-7675
ogdenm@rjrt.com

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October 18, 2018

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 3) 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 Three (3) 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,

Michael W. Ogden, Ph.D.
Senior Vice President
Scientific & Regulatory Affairs
RAI Services Company

3. ***All of your MRTPAs/PMTAs include a description of manufacturing steps and some of the new products' manufacturing process flow charts. However, the information provided does not include all the necessary information for the processes and equipment used, the in-process specification/criteria and associated test data. Without this information, the manufacturing processes and quality control for the new products cannot be fully evaluated to determine whether the new products can be manufactured consistently. Provide the necessary processes and equipment information, the in-process specifications (controls) or expected performance and tolerance values (i.e., range limits for quality control performance criteria) and associated test data as specified below.***

    a. ***For the tobacco procurement processes, provide the information listed below:***

        i. ***Procedures to ensure that the tobaccos meet your specifications or requirements and corresponding test data (e.g., procedures to verify the tobacco variety, chemical testing [nicotine, moisture, total sugar] and agrochemical residue testing of the tobacco); and***

        ii. ***Storage conditions at the Brook Cove Warehousing, Walnut Cove, NC facility such as temperature and humidity for raw materials (e.g., tobacco) and corresponding testing/monitoring data.***

    b. ***For the milling and blending processes, provide the information listed below:***

        i. ***Storage conditions at the Brook Cove Warehousing, Walnut Cove, NC facility and American Snuff Company Taylor Brothers Division, Winston-Salem, NC facility, such as temperature and humidity for raw materials (e.g., lamina and stem grades and milled tobacco) and corresponding testing/monitoring data;***

        ii. ***Equipment type and scale; and***

        iii. ***Tobacco chemical test data, such as TSNAs, before and after the milling process (if the test data is available).***

    c. ***For the casing, heat treatment and drying processes, provide the information listed below:***

        i. ***Storage conditions at the American Snuff Company Taylor Brothers Division, Winston-Salem, NC facility, such as temperature and humidity for raw materials (e.g., tobacco), ingredients, additives, and the finished products;***

        ii. ***Procedures to ensure that the raw materials, ingredients, and additives meet your specifications or requirements (e.g., procedures to verify the tobacco blending, verify the ingredient mixing specifications and casing formulations) and corresponding test data;***

        iii. ***Equipment type and scale;***

        iv. ***Test data for casing mixing duration and conditions, such as TSNAs, before and after the heat treatment and drying processes (if the test data is available); and***

v. (b) (4)

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d. For the pouching and packing processes, provide the information listed below:

i. (b) (4)

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iii.

iv.

Additionally, for any quality control tests that were tested according to national or international standards, identify the standards and state what deviations, if any, from the standards occurred.

RAIS RESPONSE TO DEFICIENCY 3a-i

RAIS understands FDA's request to be for information regarding the procedures used to ensure that procured tobacco meets RJRT requirements for determination of tobacco variety and chemical test data for nicotine, moisture, total sugar and agrochemical residue testing confirming that tobacco meets RJRT requirements.

The tobaccos procured for Camel Snus products are internationally sourced from RJRT-qualified suppliers and stemmeries that meet the standards outlined in the RJRT Stemming Guidelines (d03a-rjrt-guide-000140).[1] The guidelines include sampling and testing processes to ensure that the tobaccos purchased meet RJRT expectations.

Summary data for nicotine, sugar, and moisture from all 2016-2018 purchases for Camel Snus tobaccos were provided to the FDA during the May 22-24, 2018 Camel Snus MRTPA Inspection and are included herein for FDA's reference in d03a-nicotine-sugar-moisture-data-from-suppliers.

[1] RAIS notes that there is a typographical error on the cover page of d03a-rjrt-guide-000140; the title reads "2018 Stemming Guidelines" however the document should read "2017 Stemming Guidelines".

(b) (4)

Table 1: Description of Appendices	
Appended Files	**Description**
d03a-rjrt-guide-000140	RJRT-Guide-000140 2017 Stemming Guidelines[1]
d03a-nicotine-sugar-moisture-data-from-suppliers	Nicotine, Sugar & Moisture Data provided during the MRTP Inspection
d03a-req-12-agrochemical-residue-test-results	Agrochemical residue test data
d03a-rjrt-sop-000614	RJRT-SOP-000614 Purchase Tobacco Material/Services
d03a-rais-tpip-000001	RAIS-TPIP-000001 Tobacco Product Integrity Plan
d03a-file-linking-production-runs-to-batches	File linking tobacco batch numbers to agrochemical residue reports

In addition to the procurement processes and requirements described above, RAIS has documented processes in place for supplier orders, supplier offers and contract growing to ensure that purchased tobacco materials conform to specific requirements, as outlined in d03a-rjrt-sop-000614 (RJRT-SOP-000614).

All tobacco material and related service suppliers are qualified and approved based on their ability to consistently meet company specified requirements. Company specified requirements may include

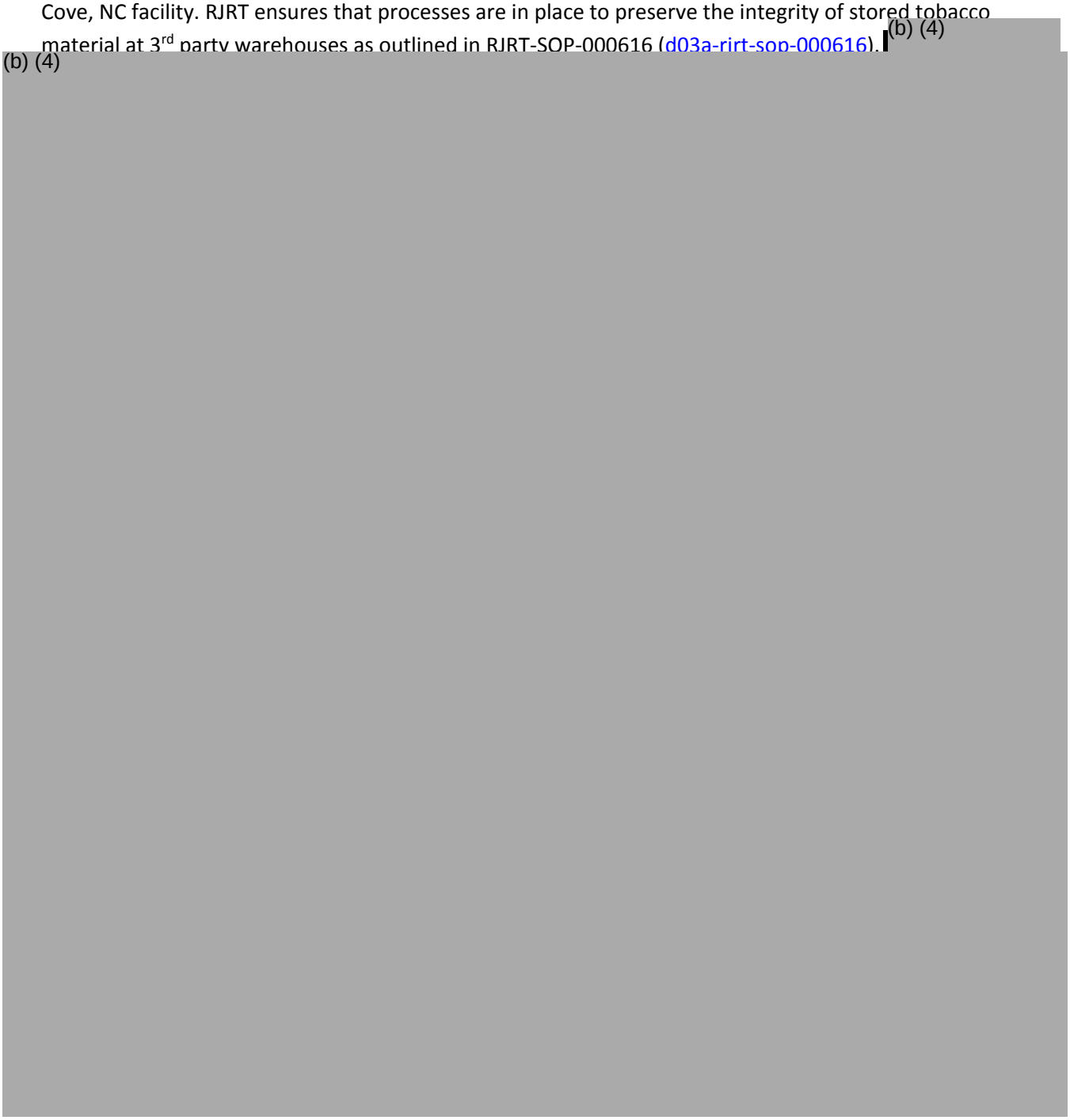
[2] See November 22, 2017 letter from James N. Figlar, Ph.D. to Hans Rosenfeldt, Ph.D. "Re: Response to November 3, 2017 Information Request for PM0000427-PM0000432."

evidence of financial viability, appropriate business process and regulatory compliance requirements, and adequate resources and facilities to consistently produce and deliver the product or service as required (d03a-rais-tpip-000001, RAIS-TPIP-000001).

RAIS RESPONSE TO DEFICIENCY 3a-ii

RAIS understands FDA's request to be for storage conditions at the Brook Cove Warehousing, Walnut Cove, NC facility. RJRT ensures that processes are in place to preserve the integrity of stored tobacco material at 3rd party warehouses as outlined in RJRT-SOP-000616 (d03a-rjrt-sop-000616). (b) (4)

(b) (4)



(b) (4)

RAIS RESPONSE TO DEFICIENCY 3b-i

RAIS understands FDA's request to be for storage conditions at the Brook Cove Warehousing, Walnut Cove, NC facility and American Snuff Company Taylor Brothers Division, Winston- Salem, NC. (b) (4)

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RAIS RESPONSE TO DEFICIENCY 3b-ii

RAIS understands FDA's request to be for an explanation of the equipment type and scale used in the milling and blending processes. An overview of the Camel Snus production process, including milling and blending, was provided to FDA in MRTPA section 3.2.2 of the MRTPA and March 21, 2018 and June 13, 2018 amendments. (b) (4)

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(b) (4)

RAIS RESPONSE TO DEFICIENCY 3b-iii

RAI understands FDA's request to be for tobacco chemical test data, such as TSNAs, before and after the milling process. (b) (4)

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To satisfy FDA's request, data related to TSNAs and other parameters tested

in finished product over the course of a 15 month stability study are provided in the RAIS GENERAL RESPONSE TO DEFICIENCY 8.

RAIS RESPONSE TO DEFICIENCY 3c-i

RAIS understands FDA's request to be for storage conditions at the American Snuff Company Taylor Brothers Division, Winston Salem, NC facility. (b) (4)

(b) (4)

RAIS RESPONSE TO DEFICIENCY 3c-ii

Procedures used to ensure that raw materials (e.g., tobacco), ingredients, and additives meet specifications or requirements during casing, heat treatment, and drying process were provided to the Agency in Section 3.2.3.2 (specifically Table 3.2-33) of the MRTPAs/PMTAs. (b) (4)

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RAIS RESPONSE TO DEFICIENCY 3c-iii

RAIS understands FDA's request to be for an explanation of the equipment type and scale used in the casing, heat-treatment, and drying process. (b) (4)

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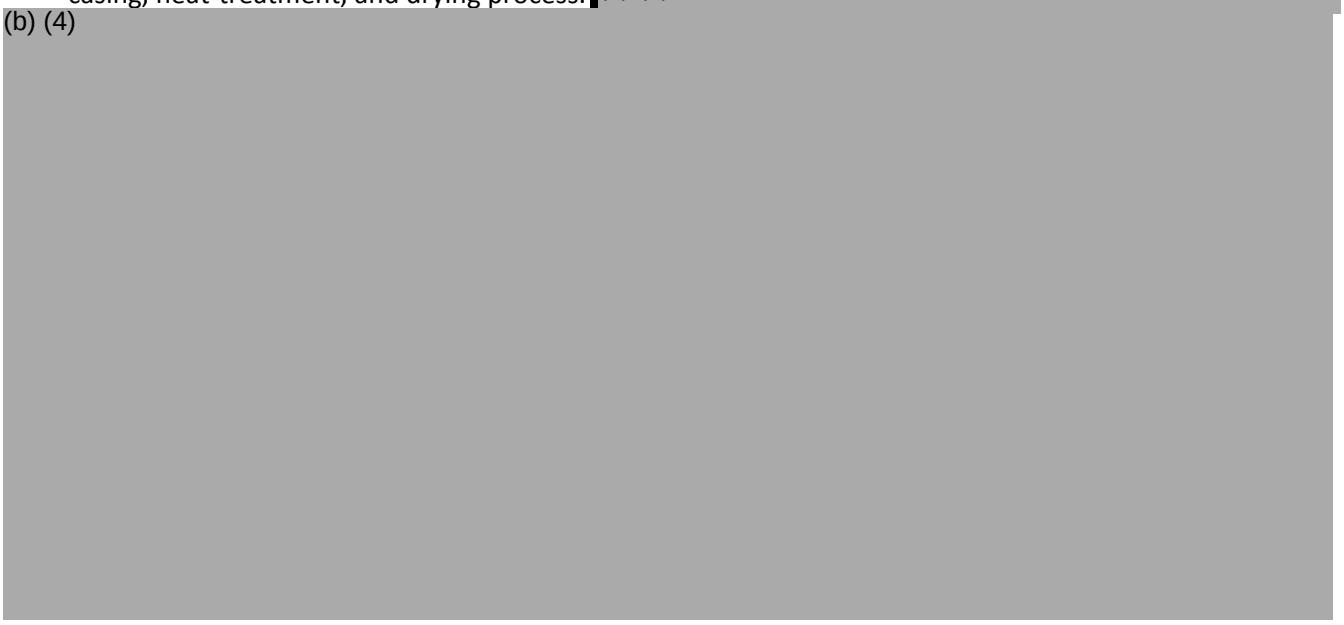

(b) (4)

RAIS RESPONSE TO DEFICIENCY 3c-iv

Test data for casing mixing duration and conditions during heat-treatment are provided in the “Snus Mixing Batch Reports” described in in Table 4. (b) (4)

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(b) (4)

RAIS RESPONSE TO DEFICIENCY 3c-v(a)

(b) (4)

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RAIS RESPONSE TO DEFICIENCY 3c-v(b)

FDA has requested in-process specification/criteria and corresponding test data for pH, OV%, and (b) (4)

(b) (4)

RAIS RESPONSE TO DEFICIENCY 3d-i

RAIS understands FDA's request to be for in-process specification/criteria and corresponding test data for pouch length (mm), width (mm), weight (mg), seal integrity, visual inspection, OV (%), and pH, (b) (4) (b) (4) . For the sake of brevity, these procedures are condensed herein to provide the most relevant work instructions, tables, and forms to address FDA's request specific to deficiency 3d-i. (b) (4) (b) (4)

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RAIS RESPONSE TO DEFICIENCY 3d-ii

RAIS understands FDA's request to be for range limits and test data for portion mass (mg) for the pouches (b) (4)

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(b) (4) Representative raw data are provided in the locations described in RAIS RESPONSE TO DEFICIENCY 2b (b) (4)

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(b) (4)

RAIS RESPONSE TO DEFICIENCY 3d-iii

RAIS understands FDA's request to be for in-process specification/criteria and corresponding test data

(b) (4)

(b) (4) For the sake of brevity, these procedures are condensed herein to provide the most relevant work instructions, tables, and forms to address

FDA's request specific to deficiency 3d-i. (b) (4)
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RAIS RESPONSE TO DEFICIENCY 3d-iv

RAIS understands FDA's request to be for range limits and test data for portion mass (mg) for the
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