



January 30, 2019

Gerard J. Roerty, Jr.  
Vice President, General Counsel & Secretary  
Swedish Match USA, Inc.  
Two James Center  
1021 East Cary Street, Suite 1600  
Richmond, VA 23219  
Phone: 804-787-5100  
Email: Gerry.Roerty@Swedishmatch.com

**SUBMISSION TRACKING NUMBERS (STNs): MR0000020-MR0000022, MR0000024-MR0000025, and MR0000027-MR0000029**

Food and Drug Administration  
Center for Tobacco Products  
Document Control Center  
Building 71, Room G335  
10903 New Hampshire Avenue  
Silver Spring, MD 20993-0002

**Subject: FEEDBACK - AMENDED RESPONSE TO ADVICE/INFORMATION REQUEST  
October 24, 2018 for MR0000020-MR0000022, MR0000024-MR0000025, and MR0000027-MR0000029**

Dear Sir or Madam:

Based upon feedback provided by Center for Tobacco Products ("CTP"), in various conference calls since our submission on November 26, 2018, Swedish Match USA, Inc. ("Swedish Match", the "Company", or "we") is providing the attached amended response relating to the eight Modified Risk Tobacco Product applications (MRTPAs) originally submitted 10 June 2014 for the following products:

- MR0000020, General Loose
- MR0000021, General Dry Mint Portion Original Mini
- MR0000022, General Portion Original Large
- MR0000024, General Classic Blend Portion White Large – 12 ct
- MR0000025, General Mint Portion White Large
- MR0000027, General Nordic Mint Portion White Large – 12 ct
- MR0000028, General Portion White Large
- MR0000029, General Wintergreen Portion White Large

This amended response addresses the items in the Advice/Information Request from CTP, dated October 24, 2018.

We appreciate your consideration of this amended response. If further information is required, please contact us.

Sincerely yours,

(b) (6)

A large rectangular area of the document is redacted with a solid gray fill, obscuring the signature and any handwritten notes or dates that might have been present.

Gerard J. Roerty, ~~W~~  
Vice President, General Counsel & Secretary

## **2.2 Information Request 2**

**All of your MRTPAs lack information about how you plan to market and promote the products as modified risk tobacco products. Submit information on how you plan to communicate the proposed modified risk information and promote the products to consumers. Specifically, provide the following:**

- a. Copies of all advertising, marketing, promotional, training, and educational materials you plan to use to communicate modified risk information to consumers.**
- b. Any marketing plans, paid media plans, and planned paid media buys for the products, including plans for use of social media advertising and/or social media/online influencers to promote the product to their followers and plans for any sampling events, free or otherwise (including a list of all those currently planned, including dates and locations) and consumer engagements. Please also include your plan to promote to consumers, for example, buying a trial pack of the product and encourage complete switching among cigarette smokers and dual users.**
- c. Any plans for earned media/PR and messaging to raise awareness of the products via traditional media outlets and online media outlets.**
- d. Any plans to use other online platforms, digital platforms, and mobile applications to sell, distribute, advertise, market, or promote the products.**
- e. Plans, policies, and procedures to restrict the sale and distribution of the products to prevent youth-access and youth-exposure to the products and their labeling, marketing, promotion, and/or advertising, including online, such as, through social media or mobile applications, whether conducted by you, on your behalf, or at your direction.**
- f. Complete descriptions of:**
  - i. your plan to disseminate the video advertisement used in the Perception and Behavioral Intentions Study to consumers;**
  - ii. any other plans for communicating modified risk information to consumers;**
  - iii. your plans to limit unintended audiences' exposure to modified risk product marketing and promotions, including specific plans to limit the marketing exposure among former smokers and youth.**

**Providing this information, if available, will help FDA understand the potential impact of your planned marketing and advertising on tobacco product users and non-users, including the risks of uptake of the products by former smokers and youth.**

On September 17, 2018, Swedish Match submitted its MRTP Amendment. In response, the FDA, Center for Tobacco Products issued an Advice Information Request posing a variety of questions, including a request for details about Swedish Match's intended marketing campaign should an MRTP Order issue. On November 26, 2018, Swedish Match provided its response. On pages 5-21 of that response Swedish Match described its marketing campaign, provided context of the tobacco category, and provided examples of proposed marketing executions/advertisements and descriptions of those execution/advertisements. These examples were contained in Appendix 3 as well as Figures 1 through 12. Subsequently, Swedish Match and FDA, Center for Tobacco Products personnel have had a series of telephone meetings to discuss aspects of the proposed executions/advertisements. Based upon those meetings, Swedish Match has decided to change the content of its proposed marketing materials, including the development of a story board for a potential video that would appear on the General snus website, should FDA issue an MRTP order in this matter. This story board is labeled "**MRTP Video Updates**" as **Attachment 1** to this document and should be considered. Any information in the November 26, 2018 submission that describes the content of or shows examples of executions/advertisements is hereby withdrawn, including Appendix 3 and Figures 1-12.

### **Swedish Match's Response**

Per telephone conference discussions with members of CTP on November 5, 2018, Swedish Match will not submit its response in a subpart format as outlined in the ADVICE/INFORMATION REQUEST directed to Gerry Roerty, Jr., Vice President, General Counsel & Secretary on October 24, 2018. Instead, the response below is meant to address each of the subparts contained in AIR Question #2.

### **Relative Size of Snus Category and General Snus Brand:**

Within the United States (US), the snus category is a small portion of the smokeless tobacco segment. Swedish Match's estimation of current year snus category volume is approximately 60 million cans. General Snus represents approximately 10% of the cans sold through retailers in the US. As perspective, the moist snuff category is estimated at 1.6 billion cans; therefore, the total snus category represents less than 4% of the moist snuff category and only 0.04% of the oral tobacco category. Additionally, General Snus' distribution is limited when compared to moist snuff. Considering only the convenience and smoke shop classes of trade, TDLinks estimates there are more than 182,000 retailers selling tobacco products within the US<sup>1</sup>. By comparison, General Snus is distributed in approximately 17,500 of these retail locations<sup>2</sup>. Further, comparative to other snus brands, each competitor has a larger retail footprint<sup>3</sup>:

---

<sup>1</sup> Comprehensive TDLinks Retail Trend Analysis 2012 (Convenience + Smoke Shops)

<sup>2</sup> Swedish Match SPL Reporting YE Estimate 2018

<sup>3</sup> Swedish Match Category Management Partnership Program database YTD September 2018

Camel Snus is sold in more than five-times (90,500 vs. 17,500) as many retail locations.

Skoal Snus is sold in more than three-times (57,200 vs. 17,500) as many retail locations.

***Responsible Marketing Practices:***

As part of our marketing and ethical code of conduct, Swedish Match takes proactive measures to ensure all marketing communication is targeted to adults who are current tobacco consumers. Swedish Match believes in responsibility above all to prevent youth access and youth exposure of brand communication whether it be labeling, promotions, advertising, or social media.

Examples of how our marketing efforts are tailored to prevent youth access and exposure:

Websites validate age of registrant through a third party as opposed to simply asking for current age.

Social media is limited to Facebook where feed is age-gated to 18+.

Print advertising limited to publications with 85% of reader ages 18+.

As it relates to our obligation to act responsibly, the approach, if granted MRTP designation, will be focused on previously tested communication, with an understanding of the importance of a MRTP designation.

Swedish Match would follow in strict accordance to the messaging tested that has proved to successfully motivate interest among smokers while not appealing to non-users.

Swedish Match would support the brand at its current levels of support (as outlined in our annual PMTA filing [[Appendix 1 to November 26, 2018 AIR response](#)]), utilizing the same proven tactical platforms and procedures that limit exposure to youth.

Additionally, Swedish Match would expect to garner some level of earned media/public relations, which is difficult to quantify and is discussed below.

***Marketing Tactics:***

Swedish Match markets General Snus via various communication platforms to reach adult tobacco consumers. Examples of such executions are outlined in the most recent PMTA filing ([Appendix 1 to November 26, 2018 AIR response](#)).

Upon achieving MRTP designation, messaging would be modified to have the MRTP approved claim featured on the marketing platforms.

### **MRTP Messaging Construct:**

Swedish Match has a modified risk messaging construct featuring both the proposed claim and a headline that was derived from the study stimuli used to communicate modified risk information to participants in the Perception and Behavioral Intentions Study submitted in Swedish Match's amendment submitted September 17, 2018 (copies of the video stimuli were provided in connection with the November 26, 2018 filing). Based upon the aforementioned telephone conferences with FDA, Center for Tobacco Products, Swedish Match has developed a story board – MRTP Video Updates ([Attachment 1](#)) for a video that will be included on the General branded website, reflecting updates to the video that was tested. Swedish Match intends to use this age-gated environment as the primary location for MRTP consumer educational information. For other tactics that do not support the use of video, Swedish Match mirrored the messaging construct of the video stimuli, which is outlined below.

#### **Headline: “A TOBACCO EXPERIENCE LIKE NO OTHER”**

Legacy, non-MRTP related branded messaging

**Proposed Claim:** “Using General Snus instead of cigarettes puts you at a lower risk of mouth cancer, heart disease, lung cancer, stroke, emphysema, and chronic bronchitis.”

**Contraindication:** General Snus is for adult tobacco users. If you do not currently use tobacco, General Snus is not for you. If you use tobacco and would like to quit, discuss with your physician or visit BeTobaccoFree.gov for more information.

### **Tactical Platforms:**

- **Branded Website** ([www.GeneralSnus.com](http://www.GeneralSnus.com)) a third-party, age-verified online platform with access limited to tobacco consumers 21+.
  - Annual Visits: 1,448,000
  - Unique Views: 281,200<sup>4</sup>
  - Registered Consumers (all 21+): 71,284
- **Print and Online Advertising** in publications/websites where 85% or more of the readership are 18+.

---

<sup>4</sup> To contextualize the viewership and registered users, according to a CDC press release dated 1/18/18, nearly 38 million American adults smoked cigarettes (“every day” or “some days”) in 2016. Based on this figure, GeneralSnus.com has a reach percentage of 0.7% of the smoking population.

- Impressions: 40.3 million total media impressions over the planned campaign<sup>5</sup>
- Earned Media/Public Relations where representatives of Swedish Match would participate in radio and print media interviews, as requested by media outlets.
- Direct Mail communication to age-verified tobacco consumers 21+ who have opted-in to receive General Snus brand communication.
  - Reach: ~40,000 mailers sent quarterly (totaling 160,000 mailers annually)
- Email communication to age-verified tobacco consumers 21+ who have opted-in to receive General Snus brand communication.
  - Reach: ~41,000 emails per send, twice monthly (totaling 984,000 emails sent annually)
- Social Media engagement via Facebook.com/GeneralSnus, which is an age-restricted, social media page only visible to consumers with a verified Facebook.com account and self-identify as 18+.
  - Reach: 8,477 Facebook followers with an average monthly reach of 8,696 consumers
- Consumer Activation Selling Events conducted with interested, age-verified (21+) tobacco consumers engaging in conversation with trained brand ambassadors regarding General Snus.
  - Reach: 17,000 annual consumer interactions

#### **Direct Marketing Communication Safeguards:**

Swedish Match's direct marketing of General Snus (via email and direct mail) is restricted to adult-tobacco consumers (21+) who have opted-in to the Swedish Match consumer database. For a consumer to be added to this database, the tobacco consumer must (1) certify that he/she is at least 21 years of age and (2) indicate that he/she wishes to receive brand communications from General Snus. Consumers can be added to the database via one of three methods:

- Registration at GeneralSnus.com
- Data collection from consumer activation selling events
- Through contact with the consumer support department

---

<sup>5</sup> "The Truth Initiative's 2016 "Left Swipe Dat" advertisement earned nearly 2 billion total media impressions.  
<https://www.prweek.com/article/1387368/nonprofit-campaign-year-2016>

All consumers added to the Swedish Match consumer database (regardless of method of addition) are verified through a third-party service, which references public records to confirm the information the consumer is certifying in the above steps.

These policies are designed to avoid sending direct marketing materials to youth or existing tobacco consumers who do not wish to receive brand marketing communications. Additionally, General Snus provides instructions on all communications for consumers who choose to stop receiving direct marketing communications from General Snus.

***Branded Website:***

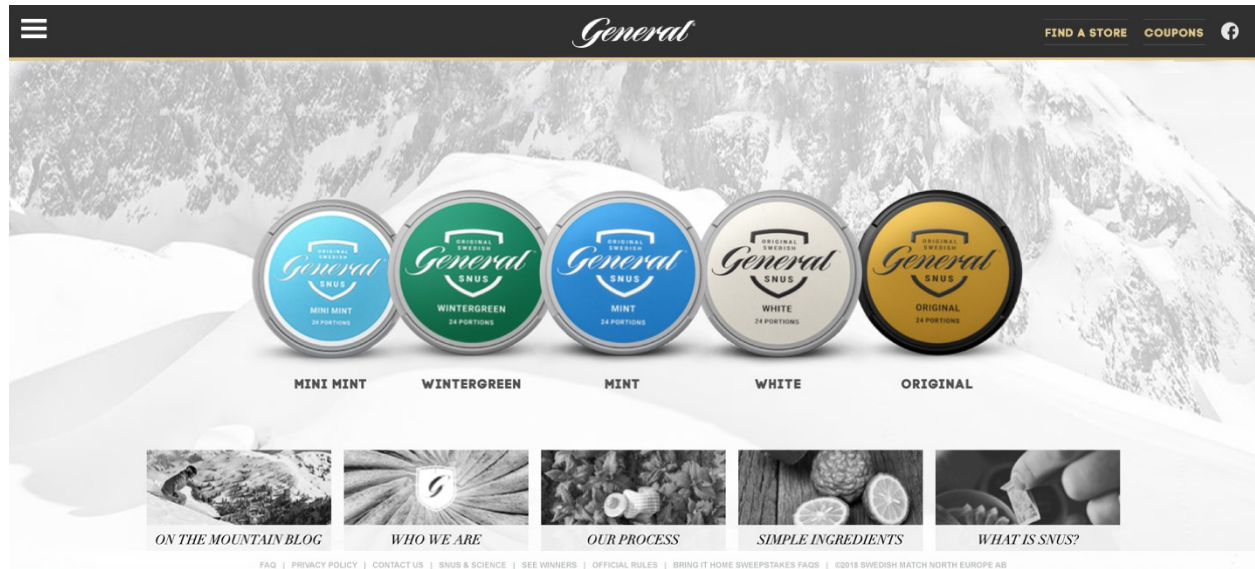
GeneralSnus.com would be designated as the primary consumer destination for educational information. The age-gated environment will be the primary consumer learning destination platform where all other marketing executions will drive consumers for additional information.

Upon initial visit to GeneralSnus.com, consumers are required to age-verify and register for an account. Upon successful registration/subsequent login, consumers will arrive at the landing page from which they can navigate to other webpages, which, among other things, will contain the proposed MRTP claim and a video (the video would track the format of the story board – MRTP Video Updates ([Attachment 1](#))).

Examples of the landing page and other pages are provided in [Figures 1 and 2](#).



Figure 1: Website Examples: MRTP Landing Page



WARNING: Smokeless tobacco is addictive.

Figure 2: Website Examples: Other Website Pages

The screenshot displays the General Snus website. At the top, there is a navigation bar with a menu icon, a 'FIND A STORE' button, the 'General' logo, a 'COUPONS' button, and a Facebook icon. The main content area features a large image of a General Snus tin (Mint flavor, 24 portions) on the left. To its right, the headline reads 'A TOBACCO EXPERIENCE LIKE NO OTHER'. Below the tin, the 'CORE INGREDIENTS' section lists: TOBACCO (From seed type and leaf position to the very climate it grows in, our experts source 22 of the world's most premium tobaccos to develop our signature blend), WATER (Pure, clean water remains one of the most crucial ingredients — affecting everything from the moisture content and flavor to how comfortable it feels in your upper lip), SALT (The addition of salt can dramatically affect any recipe, and ours is no exception. We use the very same table salt you cook with at home to give our tobacco its full-bodied flavor profile), and FLAVOR (Every ingredient we add to our tobacco must meet strict Swedish food-grade standards, even the mint and lavender oil used to give our flavors their unique characteristics). To the right of the ingredients, a text box states: 'Using General Snus instead of cigarettes puts you at a lower risk of mouth cancer, heart disease, lung cancer, stroke, emphysema, and chronic bronchitis.' Below this is a video player for 'DISCREET UPPER-LIP POUCH'. A dark blue banner below the main content area asks 'WHAT IS SNUS?' and lists benefits: PREMIUM TOBACCO, SMOKELESS, SPITLESS, FITS UNDER UPPER LIP, and ENJOY ANYWHERE. The bottom section is divided into 'WHY GENERAL?' (Imported directly from Sweden, A blend of 22 premium tobaccos, Chilled for freshness) and 'HOW TO USE' (1. Place a single pouch directly under your upper lip. 2. Wait for a slight tingling sensation. 3. Enjoy for up to 30 minutes without spitting. 4. When you're finished, place the used pouch in our disposal lid compartment). A disclaimer at the bottom states: 'General Snus is for adult-tobacco users. If you do not currently use tobacco, General Snus is not for you. If you use tobacco and would like to quit, discuss with your physician or visit BeTobaccoFree.gov for more information.' A large white box at the very bottom contains the warning: 'WARNING: Smokeless tobacco is addictive.'

General Snus is for adult-tobacco users. If you do not currently use tobacco, General Snus is not for you. If you use tobacco and would like to quit, discuss with your physician or visit [BeTobaccoFree.gov](http://BeTobaccoFree.gov) for more information.

**WARNING: Smokeless tobacco is addictive.**

The screenshot shows the General Snus website. At the top, there is a navigation bar with a menu icon, a "FIND A STORE" button, the "General" logo, a "COUPONS" button, and a Facebook icon. The main content area features a large image of a General Snus tin on the left, labeled "ORIGINAL SWEDISH General SNUS MINT 24 PORTIONS". To the right of the tin, the text reads "A TOBACCO EXPERIENCE LIKE NO OTHER". Below the tin, the heading "CORE INGREDIENTS" is followed by the text "At General, we know the end result is only as good as its core. And that's why we've crafted our...". To the right of this, a box contains a crossed-out cigarette icon and the text "Using General Snus instead of cigarettes puts you at a lower risk of mouth cancer, heart disease, lung cancer,". A large black warning banner with white text "WARNING: Smokeless tobacco is addictive." is positioned below the main content area. Below the warning banner, the website content continues with a section titled "TOBACCO" with a leaf icon, "WATER" with a drop icon, "SALT" with a salt crystal icon, and "FLAVOR" with a leaf icon. Each section has a brief description of its importance. To the right of these sections, the text "stroke, emphysema, and chronic bronchitis." is displayed. Below this, there is a video player with a play button icon and the text "DISCREET UPPER-LIP POUCH". A second black warning banner with white text "WARNING: Smokeless tobacco is addictive." is positioned at the bottom of the website content.

WARNING: Smokeless tobacco is addictive.

WARNING: Smokeless tobacco is addictive.

The warning remains fixed in place at the bottom of the browser window, resizing as needed to maintain a 20% area.

### Print Advertising:

A preliminary one-page, color print advertisement has been designed to be released upon an announcement of General Snus's MRTP designation (see example in [Figure 3](#)). Print advertising will meet Tobacco Control Act requirements and would only appear in publications with confirmed readership of at least 85% LTA+ consumers.

The print ad features the proposed claim, "Using General Snus instead of cigarettes puts you at a lower risk of mouth cancer, heart disease, lung cancer, stroke, emphysema, and chronic bronchitis."

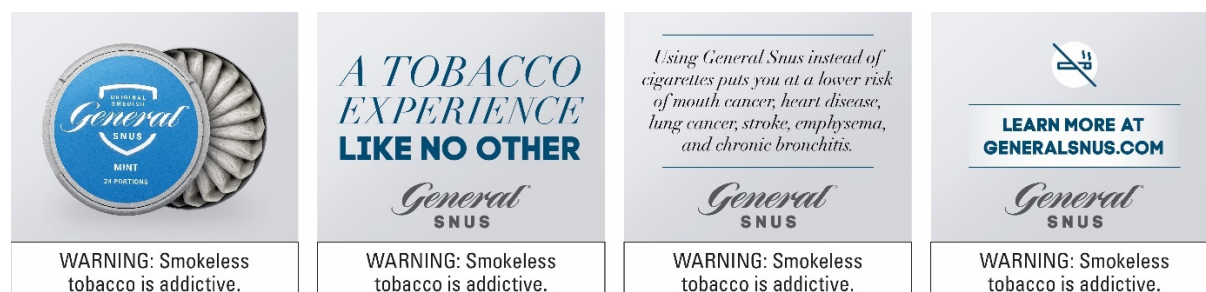
**Figure 3: Example of Print Ad**



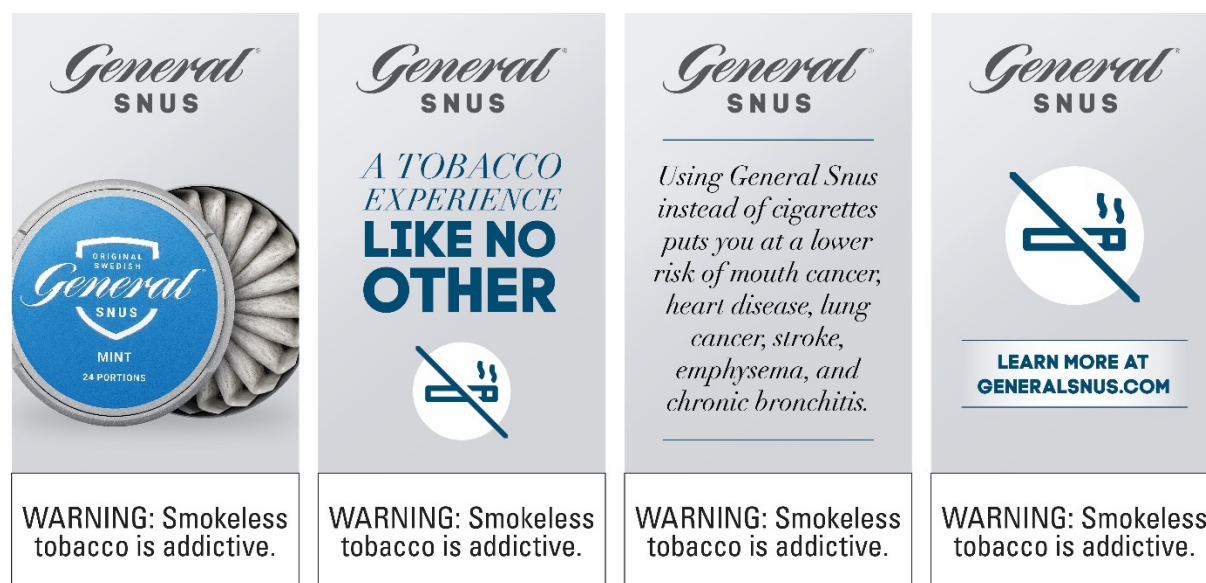
***Online Advertising:***

In addition to print advertising, two preliminary digital ads have been designed contain the proposed MRTP claim (Figure 4 and Figure 5). Online advertising will meet Tobacco Control Act requirements and would only appear on websites with confirmed readership of at least 85% LTA+ consumers. The ads would progress through four stages (from left to right in Figure 4 and Figure 5). The primary objective of the digital ads will be to drive consumers directly to GeneralSnus.com through the call to action, “Learn More.” Clicking the ad will direct the consumer to the GeneralSnus.com age-gated online page, where they can login or register (to be age verified through the existing registration process) to access the previously mentioned primary location of educational information.

**Figure 4: Digital Ad Progression 300 x 300**



**Figure 5: Digital Ad Progression 300 x 600**



***Earned Media/Public Relations:***

Swedish Match participates in radio and print media interviews when asked to provide comments about its products and would expect that a MRTP designation would generate media interest. Representatives of Swedish Match would participate in such interviews and provide content consistent with any such MRTP designation and the Tobacco Control Act generally. It is not possible to provide an estimate of how many media impressions may occur as reach is dependent upon media interest in Swedish Match receiving a MRTP designation.



### Direct Mail:

A preliminary direct mail campaign will be used (see examples of outside and inside views in Figure 6 and Figure 7, respectively). The direct mail communicates to age-verified and opted-in tobacco consumers that switching from cigarettes to General Snus reduces health risks utilizing the proposed claim. The direct mail piece would be printed in color and folded to create a self-mailer and will drive consumers to GeneralSnus.com where they can access the previously mentioned primary location of MRTP educational information.

**Figure 6: Example of MRTP Direct Mail Announcement – Outside View**



**Figure 7: Example of MRTP Direct Mail Announcement – Inside View**

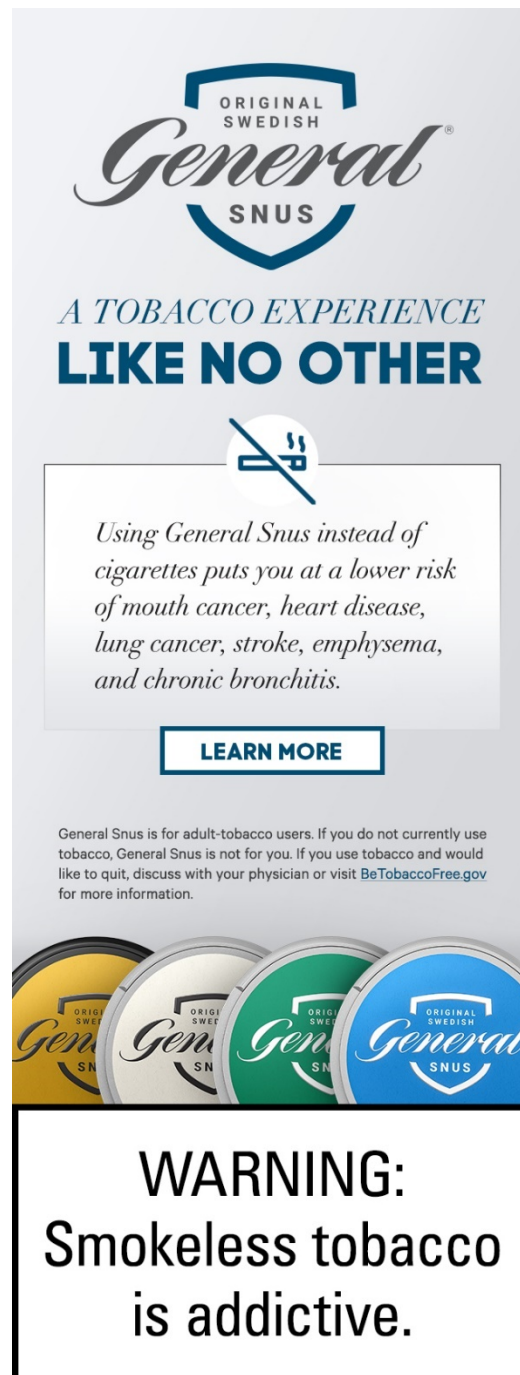


### Email:

A preliminary email template has been designed (Figure 8). The email communicates to age-verified and opted-in tobacco consumers the MRTP proposed claim. Its intent is to provide education and awareness and motivate the reader to click the “Learn More” call-to-action button and drive consumers to register at or login to GeneralSnus.com for access to the previously mentioned primary location of educational information.

Swedish Match has procedures in place to help ensure that emails comply with applicable restrictions, regulations, and laws including compliance with the CAN SPAM ACT (Controlling the Assault of Non-Solicited Pornography And Marketing Act).

**Figure 8: Example of MRTP Email Announcement**



The image is a vertical rectangular graphic representing an email announcement. At the top, it features the General Snus logo, which includes a blue shield with 'ORIGINAL SWEDISH' at the top, 'General' in a large script font in the middle, and 'SNUS' in a smaller sans-serif font at the bottom. Below the logo, the text 'A TOBACCO EXPERIENCE' is written in a blue serif font, followed by 'LIKE NO OTHER' in a large, bold, blue sans-serif font. In the center, there is a white rectangular box with a thin blue border. Above this box is a circular icon with a blue background and a white cigarette with a diagonal slash through it. Inside the white box, the text reads: 'Using General Snus instead of cigarettes puts you at a lower risk of mouth cancer, heart disease, lung cancer, stroke, emphysema, and chronic bronchitis.' Below this text is a blue rectangular button with the words 'LEARN MORE' in white, bold, sans-serif capital letters. Underneath the button, there is a line of small text: 'General Snus is for adult-tobacco users. If you do not currently use tobacco, General Snus is not for you. If you use tobacco and would like to quit, discuss with your physician or visit [BeTobaccoFree.gov](http://BeTobaccoFree.gov) for more information.' Below this text is a row of four General Snus product tins in yellow, silver, green, and blue. At the very bottom of the graphic is a white rectangular box with a thick black border containing the text: 'WARNING: Smokeless tobacco is addictive.'

**General**  
ORIGINAL SWEDISH  
SNUS

A TOBACCO EXPERIENCE  
**LIKE NO OTHER**

Using General Snus instead of cigarettes puts you at a lower risk of mouth cancer, heart disease, lung cancer, stroke, emphysema, and chronic bronchitis.

**LEARN MORE**

General Snus is for adult-tobacco users. If you do not currently use tobacco, General Snus is not for you. If you use tobacco and would like to quit, discuss with your physician or visit [BeTobaccoFree.gov](http://BeTobaccoFree.gov) for more information.

**WARNING:**  
Smokeless tobacco  
is addictive.

***Social Media:***

A preliminary social media post has been designed to appear on Facebook.com/GeneralSnus (Figure 9). The post is based on an abbreviated version of the MRTP message construct and would only be displayed in the social media feed of confirmed 18+ year-old consumers who have chosen to follow the General Snus Facebook page. The post is intended to drive awareness and understanding of General Snus' MRTP designation among loyalist consumers driving to register at or login to GeneralSnus.com for access to the previously mentioned primary location of educational information.

**Figure 9: Social Media Post**





### Consumer Activation Events:

A preliminary consumer infographic has been designed to announce the MRTP designation as well as highlight the key product attributes of General Snus ( [Figure 10](#) [front] and [Figure 11](#) [back]). The infographic will be printed on laminated paper and will communicate the proposed claim to tobacco consumers aged 21+ years.

Swedish Match utilizes highly trained, third-party brand ambassadors who engage face-to-face with interested, 21+ year-old confirmed smokeless tobacco users and smokers in adult-only facilities that meet all criteria of the Tobacco Control Act. During conversations regarding General Snus, one of the point-of-sale materials employed is an infographic, which would inform/educate current tobacco consumers of General Snus' modified risk claim designation. The third-party ambassadors will recite from a script mirroring the infographic content to educate consumers on the modified risk claim designation. Following the event, consumers will receive a subsequent follow-up email ([Figure 12](#)) encouraging consumers to login or register at GeneralSnus.com for access to the previously mentioned primary location of educational information.

**Figure 10: Consumer Infographic - Front**

The infographic is a promotional material for General Snus. It features the General Snus logo at the top left, with the tagline "ELEVATE YOUR EXPERIENCE™". Below the logo is a large image of a General Snus tin, labeled "ORIGINAL SWEDISH General SNUS MINT 24 PORTIONS". To the right of the tin, there are two columns of text: "WHY GENERAL?" and "HOW TO USE". The "WHY GENERAL?" column lists three points: "Imported directly from Sweden" (with a Swedish flag icon), "A blend of 22 premium tobaccos" (with a tobacco leaf icon), and "Chilled for freshness" (with a snowflake icon). The "HOW TO USE" column lists four steps: 1. "Place a single pouch directly under your upper lip." (with a pouch icon), 2. "Wait for a slight tingling sensation." (with a pouch icon), 3. "Enjoy for up to 30 minutes without spitting." (with a clock icon), and 4. "When you're finished, place the used pouch in our disposal lid compartment." (with a pouch icon). Below these columns, there are four small images of General Snus tins in different flavors: Original, White, Wintergreen, and Mint. At the bottom of the infographic, there is a large black box with white text that reads "WARNING: Smokeless tobacco is addictive." The background of the infographic is a light blue and white gradient with a subtle pattern of snowflakes.

**General** ELEVATE YOUR EXPERIENCE™

ORIGINAL SWEDISH  
**General**  
SNUS  
MINT  
24 PORTIONS

**WHAT IS SNUS?**

PREMIUM TOBACCO SMOKELESS SPITLESS FITS UNDER UPPER LIP ENJOY ANYWHERE

**WHY GENERAL?**

- Imported directly from Sweden
- A blend of 22 premium tobaccos
- Chilled for freshness

**HOW TO USE**

- Place a single pouch directly under your upper lip.
- Wait for a slight tingling sensation.
- Enjoy for up to 30 minutes without spitting.
- When you're finished, place the used pouch in our disposal lid compartment.

GeneralSnus.com

ORIGINAL WHITE WINTERGREEN MINT

**WARNING: Smokeless tobacco is addictive.**

Figure 11: Consumer Infographic - Back

### CORE INGREDIENTS

At General, we know the end result is only as good as its core. And that's why we've continued to craft each of our recipes with the same core ingredients for more than 150 years.

**TOBACCO**

From seed type and leaf position to the way climate it grows in, our experts source 27 of the world's most premium tobaccos to develop our signature blends.

**WATER**

Pure, clear water remains one of the most crucial ingredients — affecting everything from the nicotine content and flavor to how comfortable it feels in your upper lip.

**SALT**

The addition of salt can dramatically affect any recipe, and ours is no exception. We use the very same table salt you cook with at home to give our tobacco its full-bodied flavor profile.

**FLAVOR**

Every ingredient we add to our tobacco must meet strict Swedish Goodgrade standards, even the water and tangy natural oil used to give our flavors their unique characteristics.

## A TOBACCO EXPERIENCE LIKE NO OTHER



*Using General Snus instead of cigarettes puts you at a lower risk of mouth cancer, heart disease, lung cancer, stroke, emphysema, and chronic bronchitis.*

General Snus is for adult-tobacco users. If you do not currently use tobacco, General Snus is not for you. If you use tobacco and would like to quit, discuss with your physician or visit [BeTobaccoFree.gov](http://BeTobaccoFree.gov) for more information.

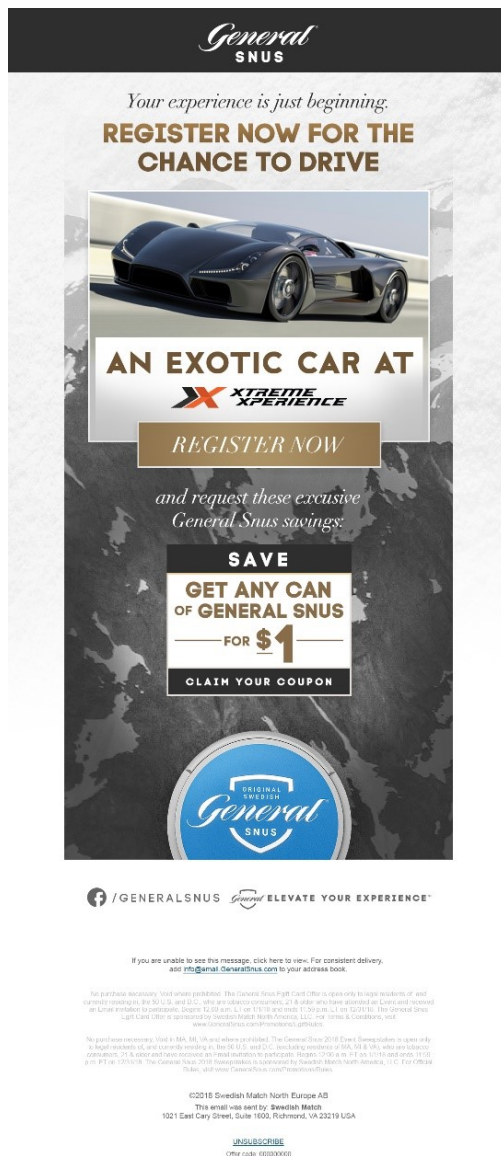
# General<sup>®</sup> SNUS



[LEARN MORE AT GENERALSNU.S.COM](http://LEARN MORE AT GENERALSNU.S.COM)

## WARNING: Smokeless tobacco is addictive.

Figure 12: Example of Follow-up Email



**WARNING: This product  
can cause gum disease  
and tooth loss.**

**GENERAL SNUS**

**ATTACHMENT 1**

**MRTP Video Updates**

M RTP VIDEO UPDATES

Audio Voice Over

“Since 1866,  
General Snus, the Original  
Swedish Snus, has  
continued to create a tobacco  
experience like  
no other.

Smokeless,  
spitless,  
and chilled for freshness,

General’s discreet upper-lip  
pouch is made with only the  
best:



01



02



03

M RTP VIDEO UPDATES

Audio Voice Over

A blend of 22 air-dried tobaccos,  
pure, clean water,  
a hint of salt,  
and other natural and artificial  
flavors found  
in everyday food items.

DISCREET UPPER-LIP POUCH

  
22 TOBACCOS

  
WATER

  
SALT


  
OTHER FLAVORS

04

  
SALT

  
OTHER FLAVORS

05

  
OTHER FLAVORS

06

MRTP VIDEO UPDATES

Audio Voice Over
But the true difference is in our process.
General's blend is steam-heated and cooled,
making a product that meets tough Swedish food-grade standards.



07



08



09



MRTP VIDEO UPDATES

Audio Voice Over
General Snus.
<i>Using General Snus instead of cigarettes puts you at a lower risk of mouth cancer, heart disease, lung cancer, stroke, emphysema and chronic bronchitis.</i>



10



11

**USING GENERAL SNUS INSTEAD OF CIGARETTES PUTS YOU AT A LOWER RISK OF MOUTH CANCER, HEART DISEASE, LUNG CANCER, STROKE, EMPHYSEMA AND CHRONIC BRONCHITIS.**

12

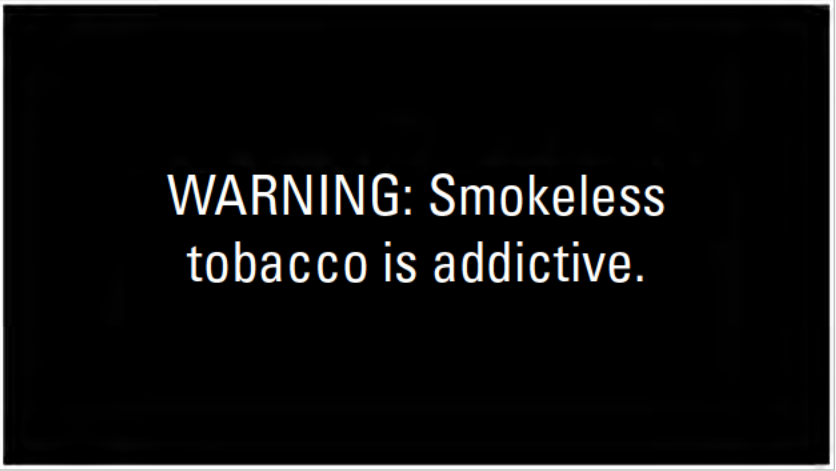


MRTP VIDEO UPDATES

Audio Voice Over
Learn more at GeneralSnus.com.
WARNING: Smokeless tobacco is addictive.



13



14