

Technical Project Lead (TPL) Review: Exemption Requests EX0000587 – EX0000606, EX0000609 – EX0000628

EX0000587: Native Menthol King Soft	(Green)
Package Type	Soft Pack
Length	84 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	Menthol
Modifications	Addition/Deletion of tobacco additives:
	Deletion of non-FSC¹ cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4)
EX0000588: Native Menthol 100's Har	, ,
Package Type	Hard Pack
Length	20 Cigarettes
Diameter	100 mm
Ventilation	7.9 mm
Characterizing Flavor	4%
Additional Property	Menthol
Package Type	Addition/Deletion of tobacco additives:
	 Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4)
EX0000589: Native Menthol King Hard	Pack (Green)
Package Type	Hard Pack
Length	84 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	Menthol
Modifications	Addition/Deletion of tobacco additives:
	Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4))

¹ FSC: Fire Standards Compliant

EX0000590: Native Menthol 100's Soft	(Green)
Package Type	Soft Pack
Length	100 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	Menthol
Modifications	Addition/Deletion of tobacco additives:
	Deletion of non-FSC cigarette paper ((b) (4)
	Addition of FSC cigarette paper (b) (4)
EX0000591: Native Menthol King Hard	Pack
Package Type	Hard Pack
Length	84 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	Menthol
Modifications	Addition/Deletion of tobacco additives:
	 Deletion of non-FSC cigarette paper (b) (4)
)
	 Addition of FSC cigarette paper (b) (4)
EX0000592: Native Menthol King Soft	
Package Type	Soft Pack
Length	84mm
Diameter	7.9 mm
Ventilation	4%
Ventilation Characterizing Flavor	4% Menthol
Ventilation	4% Menthol Addition/Deletion of tobacco additives:
Ventilation Characterizing Flavor	4% Menthol
Ventilation Characterizing Flavor	4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4)
Ventilation Characterizing Flavor	4% Menthol Addition/Deletion of tobacco additives:
Ventilation Characterizing Flavor Modifications	Menthol Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4)
Ventilation Characterizing Flavor Modifications EX0000593: Native Menthol 100's Soft	4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4)
Ventilation Characterizing Flavor Modifications EX0000593: Native Menthol 100's Soft Package Type	Menthol Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack
Ventilation Characterizing Flavor Modifications EX0000593: Native Menthol 100's Soft Package Type Length	Menthol Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm
Characterizing Flavor Modifications EX0000593: Native Menthol 100's Soft Package Type Length Diameter	Menthol Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm
Ventilation Characterizing Flavor Modifications EX0000593: Native Menthol 100's Soft Package Type Length Diameter Ventilation	Menthol Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4%
Characterizing Flavor Modifications EX0000593: Native Menthol 100's Soft Package Type Length Diameter	Menthol Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% Menthol
Characterizing Flavor Modifications EX0000593: Native Menthol 100's Soft Package Type Length Diameter Ventilation Characterizing Flavor	Menthol Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives:
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Characterizing Flavor Modifications EX0000593: Native Menthol 100's Soft Package Type Length Diameter Ventilation Characterizing Flavor	Menthol Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives:

EX0000595: Native Menthol 100's Hard Pack Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000596: Native King Soft (Blue) Package Type Length Diameter Ventilation Ventilation Characterizing Flavor None Modifications EX0000597: Native King Hard Pack (Ultra) Package Type Length Addition EX0000597: Native King Hard Pack (Ultra) Package Type Length B4 mm Diameter Ventilation Characterizing Flavor None Modifications Addition	
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Package Type Hard F)
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Modifications Additio	
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	ion/Deletion of tobacco additives:
•	Deletion of non-FSC cigarette paper (b) (4)
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	Addition of FSC cigarette paper (b) (4)
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	Deletion of non-FSC cigarette paper ((b) (4)

EX0000598: Native 100's Hard Pack (U	ltra)
Package Type	Hard Pack
Length	100 mm
Diameter	7.9 mm
Ventilation	30%
Characterizing Flavor	None
Modifications	Addition/Deletion of tobacco additives:
	Deletion of non-FSC cigarette paper ((b) (4)
	Addition of FSC cigarette paper (b) (4)
)
EX0000599: Native 100's Soft (Ultra)	
Package Type	Soft Pack
Length	100 mm
Diameter	7.9 mm
Ventilation	30%
Characterizing Flavor	None
Modifications	Addition/Deletion of tobacco additives:
	Deletion of non-FSC cigarette paper ((b) (4)
	Addition of FSC cigarette paper (b) (4)
	J
EVOCOCO Native 100's Hard Dack (D	lua)
EX0000600: Native 100's Hard Pack (B	
Package Type	Hard Pack
Package Type Length	Hard Pack 100 mm
Package Type Length Diameter	Hard Pack 100 mm 7.9 mm
Package Type Length Diameter Ventilation	Hard Pack 100 mm 7.9 mm 4%
Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None
Package Type Length Diameter Ventilation	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives:
Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None
Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives:
Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000601: Native King Hard Pack (Blo	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000601: Native King Hard Pack (Blue) Package Type	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Hard Pack
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000601: Native King Hard Pack (Blue Package Type Length Diameter Ventilation	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Hard Pack 84 mm 7.9 mm 4%
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000601: Native King Hard Pack (Blue Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Hard Pack 84 mm 7.9 mm 4% None
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000601: Native King Hard Pack (Blue Package Type Length Diameter Ventilation	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Hard Pack 84 mm 7.9 mm 4% None Addition/Deletion of tobacco additives:
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000601: Native King Hard Pack (Blue Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Hard Pack 84 mm 7.9 mm 4% None
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000601: Native King Hard Pack (Blue Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Hard Pack 84 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000601: Native King Hard Pack (Blue Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Hard Pack 84 mm 7.9 mm 4% None Addition/Deletion of tobacco additives:

EX0000602: Native Full Flavor King Ha	rd Pack
Package Type	Hard Pack
Length	84 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	None
Modifications	Addition/Deletion of tobacco additives:
	Deletion of non-FSC cigarette paper (b) (4)
	 Addition of FSC cigarette paper (b) (4)
EX0000603: Native Full Flavor 100's Sc	ft
Package Type	Soft Pack
Length	100 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	None
Modifications	Addition/Deletion of tobacco additives:
	 Deletion of non-FSC cigarette paper (b) (4)
	 Addition of FSC cigarette paper (b) (4)
)
EX0000604: Native Full Flavor King Sof	
Package Type	Soft Pack
Length	84 mm
D!	7.9 mm
Diameter	
Ventilation	4%
Ventilation Characterizing Flavor	4% None
Ventilation	4% None Addition/Deletion of tobacco additives:
Ventilation Characterizing Flavor	4% None
Ventilation Characterizing Flavor	Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4)
Ventilation Characterizing Flavor	4% None Addition/Deletion of tobacco additives:
Ventilation Characterizing Flavor Modifications	Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4)
Ventilation Characterizing Flavor Modifications EX0000605: Native 100's Soft (Blue)	None Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4)
Characterizing Flavor Modifications EX0000605: Native 100's Soft (Blue) Package Type	None Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack
Characterizing Flavor Modifications EX0000605: Native 100's Soft (Blue) Package Type Length	None Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm
Characterizing Flavor Modifications EX0000605: Native 100's Soft (Blue) Package Type Length Diameter	None Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm
Characterizing Flavor Modifications EX0000605: Native 100's Soft (Blue) Package Type Length Diameter Ventilation	None Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4%
Characterizing Flavor Modifications EX0000605: Native 100's Soft (Blue) Package Type Length Diameter Ventilation Characterizing Flavor	None Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% None
Characterizing Flavor Modifications EX0000605: Native 100's Soft (Blue) Package Type Length Diameter Ventilation	None Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives:
Characterizing Flavor Modifications EX0000605: Native 100's Soft (Blue) Package Type Length Diameter Ventilation Characterizing Flavor	None Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% None
Characterizing Flavor Modifications EX0000605: Native 100's Soft (Blue) Package Type Length Diameter Ventilation Characterizing Flavor	None Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4)
Characterizing Flavor Modifications EX0000605: Native 100's Soft (Blue) Package Type Length Diameter Ventilation Characterizing Flavor	None Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives:

EX0000606: Native Full Flavor 100's Ha	ard Pack
Package Type	Hard Pack
Length	100 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	None
Modifications	Addition/Deletion of tobacco additives:
	Deletion of non-FSC cigarette paper (b) (4)
	 Addition of FSC cigarette paper (b) (4)
)
EX0000609: Native Menthol King Hard	Pack (Green)
Package Type	Hard Pack
Length	84 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	Menthol
Modifications	Addition/Deletion of tobacco additives:
	Deletion of non-FSC cigarette paper (b) (4)
	 Addition of FSC cigarette paper (b) (4)
EV0000C10. NI-Airra NAAb - I Vin- C-ft	(Caran)
EX0000610: Native Menthol King Soft	
Package Type	Soft Pack
Package Type Length	Soft Pack 84 mm
Package Type Length Diameter	Soft Pack 84 mm 7.9 mm
Package Type Length Diameter Ventilation	Soft Pack 84 mm 7.9 mm 4%
Package Type Length Diameter Ventilation Characterizing Flavor	Soft Pack 84 mm 7.9 mm 4% Menthol
Package Type Length Diameter Ventilation	Soft Pack 84 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives:
Package Type Length Diameter Ventilation Characterizing Flavor	Soft Pack 84 mm 7.9 mm 4% Menthol
Package Type Length Diameter Ventilation Characterizing Flavor	Soft Pack 84 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor	Soft Pack 84 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives:
Package Type Length Diameter Ventilation Characterizing Flavor	Soft Pack 84 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications	Soft Pack 84 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000611: Native Menthol 100's Soft	Soft Pack 84 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000611: Native Menthol 100's Soft	Soft Pack 84 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) (Green) Soft Pack
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000611: Native Menthol 100's Soft Package Type Length	Soft Pack 84 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4%
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000611: Native Menthol 100's Soft Package Type Length Diameter Ventilation Characterizing Flavor	Soft Pack 84 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) (Green) Soft Pack 100 mm 7.9 mm 4% Menthol
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000611: Native Menthol 100's Soft Package Type Length Diameter Ventilation	Soft Pack 84 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) (Green) Soft Pack 100 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives:
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000611: Native Menthol 100's Soft Package Type Length Diameter Ventilation Characterizing Flavor	Soft Pack 84 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) (Green) Soft Pack 100 mm 7.9 mm 4% Menthol
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000611: Native Menthol 100's Soft Package Type Length Diameter Ventilation Characterizing Flavor	Soft Pack 84 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) (Green) Soft Pack 100 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000611: Native Menthol 100's Soft Package Type Length Diameter Ventilation Characterizing Flavor	Soft Pack 84 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) (Green) Soft Pack 100 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives:

EX0000612: Native Menthol 100's Ha	rd Pack (Green)
Package Type	Hard Pack
Length	100 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	Menthol
Modifications	Addition/Deletion of tobacco additives:
	 Deletion of non-FSC cigarette paper (b) (4)
	 Addition of FSC cigarette paper (b) (4)
EX0000613: Native Menthol King Har	d Pack
Package Type	Hard Pack
Length	84 mm
Diameter	7.9 mm
V entilation	4%
Characterizing Flavor	Menthol
Modifications	Addition/ Deletion of tobacco additives:
	 Deletion of non-FSC cigarette paper (b) (4)
	 Addition of FSC cigarette paper (b) (4)
)
EX0000614: Native Menthol King Sof	
Package Type	Soft Pack
Length	84 mm
Diameter	7.9 mm
Diameter Ventilation	4%
Diameter Ventilation Characterizing Flavor	4% Menthol
Diameter Ventilation	4% Menthol Addition/ Deletion of tobacco additives:
Diameter Ventilation Characterizing Flavor	4% Menthol
Diameter Ventilation Characterizing Flavor	4% Menthol Addition/ Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4)
Diameter Ventilation Characterizing Flavor	4% Menthol Addition/ Deletion of tobacco additives:
Diameter Ventilation Characterizing Flavor Modifications	Menthol Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4)
Diameter Ventilation Characterizing Flavor Modifications EX0000615: Native Menthol 100's So	4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4)
Diameter Ventilation Characterizing Flavor Modifications EX0000615: Native Menthol 100's Sor	Menthol Addition/ Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack
Diameter Ventilation Characterizing Flavor Modifications EX0000615: Native Menthol 100's Sor Package Type Length	Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm
Diameter Ventilation Characterizing Flavor Modifications EX0000615: Native Menthol 100's Sor Package Type Length Diameter	Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm
Diameter Ventilation Characterizing Flavor Modifications EX0000615: Native Menthol 100's Sor Package Type Length Diameter Ventilation	Menthol Addition/ Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4%
Diameter Ventilation Characterizing Flavor Modifications EX0000615: Native Menthol 100's Sor Package Type Length Diameter Ventilation Characterizing Flavor	Menthol Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% Menthol
Diameter Ventilation Characterizing Flavor Modifications EX0000615: Native Menthol 100's So Package Type Length Diameter Ventilation	Menthol Addition/ Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% Menthol Addition/ Deletion of tobacco additives:
Diameter Ventilation Characterizing Flavor Modifications EX0000615: Native Menthol 100's Sor Package Type Length Diameter Ventilation Characterizing Flavor	Menthol Addition/Deletion of tobacco additives: Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% Menthol
Diameter Ventilation Characterizing Flavor Modifications EX0000615: Native Menthol 100's Sor Package Type Length Diameter Ventilation Characterizing Flavor	Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% Menthol Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4)
Diameter Ventilation Characterizing Flavor Modifications EX0000615: Native Menthol 100's Sor Package Type Length Diameter Ventilation Characterizing Flavor	Menthol Addition/ Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% Menthol Addition/ Deletion of tobacco additives:

EX0000616: Native Menthol 100's Ha	ord Pack
Package Type	Hard Pack
Length	100 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	Menthol
Modifications	Addition/Deletion of tobacco additives:
	 Deletion of non-FSC cigarette paper (b) (4)
)
	 Addition of FSC cigarette paper (b) (4)
)
EX0000617: Native King Soft (Blue)	
Package Type	Soft Pack
Length	84 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	None
Modifications	Addition/Deletion of tobacco additives:
	Deletion of non-FSC cigarette paper (b) (4)
)
	 Addition of FSC cigarette paper (b) (4)
EX0000618: Native King Soft (Ultra)	C-D-DI
Package Туре	Soft Pack
Package Type Length	84 mm
Package Type Length Diameter	84 mm 7.9 mm
Package Type Length Diameter Ventilation	84 mm 7.9 mm 30%
Package Type Length Diameter Ventilation Characterizing Flavor	84 mm 7.9 mm 30% None
Package Type Length Diameter Ventilation	84 mm 7.9 mm 30% None Addition/Deletion of tobacco additives:
Package Type Length Diameter Ventilation Characterizing Flavor	84 mm 7.9 mm 30% None
Package Type Length Diameter Ventilation Characterizing Flavor	84 mm 7.9 mm 30% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor	84 mm 7.9 mm 30% None Addition/Deletion of tobacco additives:
Package Type Length Diameter Ventilation Characterizing Flavor Modifications	84 mm 7.9 mm 30% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000619: Native 100's Soft (Ultra)	84 mm 7.9 mm 30% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000619: Native 100's Soft (Ultra) Package Type	84 mm 7.9 mm 30% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000619: Native 100's Soft (Ultra)	84 mm 7.9 mm 30% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000619: Native 100's Soft (Ultra) Package Type Length	84 mm 7.9 mm 30% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000619: Native 100's Soft (Ultra) Package Type Length Diameter	84 mm 7.9 mm 30% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000619: Native 100's Soft (Ultra) Package Type Length Diameter Ventilation	84 mm 7.9 mm 30% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 30%
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000619: Native 100's Soft (Ultra) Package Type Length Diameter Ventilation Characterizing Flavor	84 mm 7.9 mm 30% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 30% None
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000619: Native 100's Soft (Ultra) Package Type Length Diameter Ventilation Characterizing Flavor	84 mm 7.9 mm 30% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 30% None Addition/Deletion of tobacco additives:
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000619: Native 100's Soft (Ultra) Package Type Length Diameter Ventilation Characterizing Flavor	84 mm 7.9 mm 30% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 30% None Addition/Deletion of tobacco additives:

EX0000620: Native King hard pack (U	lltra)
Package Type	Hard Pack
Length	84 mm
Diameter	7.9 mm
Ventilation	30%
Characterizing Flavor	None
Modifications	Addition/Deletion of tobacco additives:
	Deletion of non-FSC cigarette paper (b) (4)
	 Addition of FSC cigarette paper (b) (4)
EX0000621: Native 100's Hard Pack (Ultra)
Package Type	Hard Pack
Length	100 mm
Diameter	7.9 mm
Ventilation	30%
Characterizing Flavor	None
Modifications	Addition/Deletion of tobacco additives:
	Deletion of non-FSC cigarette paper (b) (4)
	 Addition of FSC cigarette paper (b) (4)
EV0000533 N 1: 1001 H 10 17	DI)
EX0000622: Native 100's Hard Pack (· ·
Package Type	Hard Pack
Package Type Length	Hard Pack 100 mm
Package Type Length Diameter	Hard Pack 100 mm 7.9 mm
Package Type Length Diameter Ventilation	Hard Pack 100 mm 7.9 mm 4%
Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None
Package Type Length Diameter Ventilation	Hard Pack 100 mm 7.9 mm 4% None Addition/ Deletion of tobacco additives:
Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None
Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None Addition/ Deletion of tobacco additives:
Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000623: Native 100's Soft (Blue)	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000623: Native 100's Soft (Blue) Package Type	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) Addition of FSC cigarette paper (b) (4) Soft Pack
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000623: Native 100's Soft (Blue) Package Type Length	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000623: Native 100's Soft (Blue) Package Type Length Diameter	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) ———————————————————————————————————
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000623: Native 100's Soft (Blue) Package Type Length Diameter Ventilation	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4%
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000623: Native 100's Soft (Blue) Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) • Addition of FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% None
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000623: Native 100's Soft (Blue) Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) Soft Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4)
Package Type Length Diameter Ventilation Characterizing Flavor Modifications EX0000623: Native 100's Soft (Blue) Package Type Length Diameter Ventilation Characterizing Flavor	Hard Pack 100 mm 7.9 mm 4% None Addition/Deletion of tobacco additives: • Deletion of non-FSC cigarette paper (b) (4) ———————————————————————————————————

EX0000624: Native Full Flavor King H	ard Pack
Package Type	Hard Pack
Length	84 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	None
Modifications	Addition/Deletion of tobacco additives:
	 Deletion of non-FSC cigarette paper (b) (4)
)
	 Addition of FSC cigarette paper (b) (4)
)
EX0000625: Native King Hard Pack (B	
Package Type	Hard Pack
Length	84 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	None
Modifications	Addition/Deletion of tobacco additives:
	Deletion of non-FSC cigarette paper (b) (4)
	 Addition of FSC cigarette paper (b) (4)
)
EX0000626: Native Full Flavor King So	
Package Type	Soft Pack
Length	84 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	None
Modifications	Addition/Deletion of tobacco additives:
	Deletion of non-FSC cigarette paper ((b) (4)
	A 1 livi
	Addition of FSC cigarette paper (b) (4)
EX0000627: Native Full Flavor 100's S	inf)
Package Type	Soft Pack
Length	100 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	None
Modifications	Addition/Deletion of tobacco additives:
Wodifications	Deletion of non-FSC cigarette paper ((b) (4))
)
	Addition of FSC cigarette paper (b) (4)
	, talking of the dibateste babet (b) (4)

EX0000628: Native Full Flavor 100's Hard Pack		
Package Type	Hard Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	
Modifications	Addition/Deletion of tobacco additives:	
	 Deletion of non-FSC cigarette paper (b) (4) 	
	 Addition of FSC cigarette paper (b) (4) 	
Common Attributes of Exemption Re	quests	
Applicant	Susan Jesmer d/b/a Native Trading Associates	
Product Category	Cigarette	
Product Sub-Category	Filtered Combusted	
Package Quantity	20 Cigarettes	
Recommendation		
Issue an Exempt order letter.		

Technical Project Lead (TPL):

Digitally signed by Todd L. Cecil -S Date: 2019.07.19 09:14:54 -04'00'

For Matthew J. Walters, Ph.D., MPH CDR, U.S. Public Health Service Deputy Director Division of Product Science

Signatory Decision:

D' ' II ' II AA ' I D II I	_
☐ Do not concur with TPL recommendation (see separate memo)	
\square Concur with TPL recommendation with additional comments (see separate m	iemo
☐ Concur with TPL recommendation and basis of recommendation	

Digitally signed by Matthew R. Holman -S Date: 2019.07.19 09:55:18 -04'00'

Matthew R. Holman, Ph.D. Director
Office of Science

TABLE OF CONTENTS

1.	BAC	KGROUND	13
	1.1.	ORIGINAL TOBACCO PRODUCTS	13
	1.2.	REGULATORY ACTIVITY RELATED TO THIS REVIEW	21
	1.3.	SCOPE OF REVIEW	21
	1.4.	TOBACCO ADDITIVE MODIFICATION	21
2.	REG	ULATORY REVIEW	21
3.	CON	1PLIANCE REVIEW	22
4.	SCIE	NTIFIC REVIEW	22
5.	ENV	IRONMENTAL DECISION	22
6	CON	CLUSION AND RECOMMENDATION	22

1. BACKGROUND

1.1. ORIGINAL TOBACCO PRODUCTS

The applicant submitted the following original tobacco products:

Table 1. Original Tobacco Products

EX0000587: Native Menthol King Soft (Green)		
Product Name	Native Menthol Lights King Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	Menthol	
EX0000588: Native Menthol 100's Hard Pack (Green)		
Product Name	Native Menthol Lights 100's Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	Menthol	
EX0000589: Native Menthol King Hard Pack (Green)		
Product Name	Native Menthol Lights King Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	Menthol	
EX0000590: Native Menthol 100's Soft (Green)		
Product Name	Native Menthol Lights 100's Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	Menthol	

EX0000591: Native Menthol King	Hard Pack
Product Name	Native Menthol King Hard Pack
Package Quantity	20 Cigarettes
Package Type	Hard Pack
Length	84 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	Menthol
EX0000592: Native Menthol King	Soft
Product Name	Native Menthol King Soft Pack
Package Quantity	20 Cigarettes
Package Type	Soft Pack
Length	84 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	Menthol
EX0000593: Native Menthol 100's	Soft
Product Name	Native Menthol 100's Soft Pack
Package Quantity	20 Cigarettes
Package Type	Soft Pack
Length	100 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	Menthol
EX0000594: Native King Soft (Ultr	ra)
Product Name	Native Ultra Lights King Soft Pack
Package Quantity	20 Cigarettes
Package Type	Soft Pack
Length	84 mm
Diameter	7.9 mm
Ventilation	30%
Characterizing Flavor	None
EX0000595: Native Menthol 100's	
Product Name	Native Menthol 100's Hard Pack
Package Quantity	20 Cigarettes
Package Type	Hard Pack
Length	100 mm
Diameter	7.9 mm
Ventilation	4%
Characterizing Flavor	Menthol

EX0000596: Native King Soft (Blue)		
Product Name	Native Lights King Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	
EX0000597: Native King Hard Pac	k (Ultra)	
Product Name	Native Ultra Lights King Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	30%	
Characterizing Flavor	None	
EX0000598: Native 100's Hard Page	ck (Ultra)	
Product Name	Native Ultra Lights 100's Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	30%	
Characterizing Flavor	None	
EX0000599: Native 100's Soft (Ult	ra)	
Product Name	Native Ultra Lights 100's Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	30%	
Characterizing Flavor	None	
EX0000600: Native 100's Hard Pa		
Product Name	Native Lights 100's Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	

EX0000601: Native King Hard Pack (Blue)		
Product Name	Native Lights King Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	
EX0000602: Native Full Flavor Kin	g Hard Pack	
Product Name	Native Full Flavor King Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	
EX0000603: Native Full Flavor 100	O's Soft	
Product Name	Native Full Flavor 100's Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	
EX0000604: Native Full Flavor Kin	g Soft	
Product Name	Native Full Flavor King Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	
EX0000605: Native 100's Soft (Blue)		
Product Name	Native Lights 100's Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	

EX0000606: Native Full Flavor 100's Hard Pack		
Product Name	Native Full Flavor 100's Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	
EX0000609: Native Menthol King	Hard Pack (Green)	
Product Name	Native Menthol Lights King Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	Menthol	
EX0000610: Native Menthol King	Soft (Green)	
Product Name	Native Menthol Lights King Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	Menthol	
EX0000611: Native Menthol 100's		
Product Name	Native Menthol Lights 100's Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	Menthol	
EX0000612: Native Menthol 100	's Hard Pack (Green)	
Product Name	Native Menthol Lights 100's Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	Menthol	

EX0000613: Native Menthol King Hard Pack		
Product Name	Native Menthol King Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	Menthol	
EX0000614: Native Menthol King	Soft	
Product Name	Native Menthol King Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	Menthol	
EX0000615: Native Menthol 100's	s Soft	
Product Name	Native Menthol 100's Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	Menthol	
EX0000616: Native Menthol 100's	Hard Pack	
Product Name	Native Menthol 100's Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	Menthol	
EX0000617: Native King Soft (Blue)		
Product Name	Native Lights King Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	

EX0000618: Native King Soft (Ultra)		
Product Name	Native Ultra Lights King Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	30%	
Characterizing Flavor	None	
EX0000619: Native 100's Soft (Ult	ra)	
Product Name	Native Ultra Lights 100's Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	30%	
Characterizing Flavor	None	
EX0000620: Native King Hard Pac	k (Ultra)	
Product Name	Native Ultra Lights King Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	30%	
Characterizing Flavor	None	
EX0000621: Native 100's Hard Pa	ck (Ultra)	
Product Name	Native Ultra Lights 100's Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	30%	
Characterizing Flavor	None	
EX0000622: Native 100's Hard Pa		
Product Name	Native Lights 100's Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	

EX0000623: Native 100's Soft (Blue)		
Product Name	Native Lights 100's Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	
EX0000624: Native Full Flavor Kin	g Hard Pack	
Product Name	Native Full Flavor King hard pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	
EX0000625: Native King Hard Pac	k (Blue)	
Product Name	Native Lights King Hard Pack	
Package Quantity	20 Cigarettes	
Package Type	Hard Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	
EX0000626: Native Full Flavor Kin	g Soft	
Product Name	Native Full Flavor King Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	84 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	
EX0000627: Native Full Flavor 100's Soft		
Product Name	Native Full Flavor 100's Soft Pack	
Package Quantity	20 Cigarettes	
Package Type	Soft Pack	
Length	100 mm	
Diameter	7.9 mm	
Ventilation	4%	
Characterizing Flavor	None	

EX0000628: Native Full Flavor 100's Hard Pack	
Product Name	Native Full Flavor 100's Hard Pack
Package Quantity	20 Cigarettes
Package Type	Hard Pack
Length	100 mm
Diameter	7.9 mm
Ventilation	4.0%
Characterizing Flavor	None

The applicant manufactures the original tobacco products and claims that they are grandfathered.

1.2. REGULATORY ACTIVITY RELATED TO THIS REVIEW

On June 6, 2019, FDA received Exemption Requests (EX0000587-EX0000606); and on June 7, 2019 (EX0000609 – EX0000628) from Susan Jesmer d/b/a Native Trading Associates on June 14, 2019, FDA issued Acknowledgement letters to the applicant. On June 19, 2019, FDA requested clarifying information for EX0000587, EX0000591, EX0000592, EX0000596, EX0000610, EX0000613, and EX0000628. On June 24, 2019, FDA received an amendment (EX0000640) containing the requested information. On July 1, 2019, FDA issued a correction letter to notify the applicant that we revised our records to reflect a change to the submission tracking numbers for EX0000587-EX0000593.

1.3. SCOPE OF REVIEW

This review captures all regulatory, compliance, and scientific reviews completed for these Exemption Requests.

1.4. TOBACCO ADDITIVE MODIFICATION

The new tobacco products contain the following modifications compared to the corresponding original tobacco products:

- Deletion of non-FSC cigarette paper
- Addition of FSC cigarette paper

2. REGULATORY REVIEW

Regulatory reviews were completed by Kristopher Van Amburg and Emily Busta on June 14, 2019. The reviews conclude that these Exemption Requests are administratively complete.

3. COMPLIANCE REVIEW

The Office of Compliance and Enforcement (OCE) completed a review to determine whether the applicant established that the original tobacco products are grandfathered products (i.e., were commercially marketed in the United States other than exclusively in test markets as of February 15, 2007). The OCE reviews dated July 2, 2019 for EX0000587-EX0000606, EX0000609-EX0000613 and July 3, 2019 for EX000614-EX000628, concludes that the original tobacco products are grandfathered products. Therefore, the original products are eligible for modification under the Exemption Request pathway.²

4. SCIENTIFIC REVIEW

A scientific review was completed by Jikun Liu on July 15, 2019].

The review states that the new tobacco products have been modified by adding and deleting tobacco additives. Cigarette paper is used in the manufacturing of the original tobacco products and are additives because their intended use may reasonably be expected to result, directly or indirectly, in their becoming a component or otherwise affecting the characteristics of the tobacco products. The review concludes that the modifications are minor modifications of a tobacco product in accordance with section 905(j)(3)(A)(i) of the FD&C Act. The review concludes that the deletion of non-FSC cigarette paper and addition of FSC cigarette paper in the new tobacco products is a minor modification. The change from non-FSC to FSC cigarette paper may result in increased HPHC yields; however, the reduction in household fires is anticipated to outweigh any potential increased health risks from the small increases in HPHC exposures that may occur from the use of the FSC cigarette paper, as outlined in the July 14, 2017, toxicology memo.

5. ENVIRONMENTAL DECISION

Environmental reviews were completed by Thomas Creaven on July 3, 2019 for EX0000587-EX0000606 and Ronald Edwards on June 28, 2019 for EX0000609-EX0000628.

A finding of no significant impact (FONSI) was signed by Kimberly Benson, Ph.D. on July 3, 2019 for EX0000609-EX0000628 and July 5, 2019 for EX0000587-EX0000606. The FONSI was supported by environmental assessments prepared by FDA on July 3, 2019 for EX0000609-EX0000628 and July 5, 2019 for EX0000587-EX0000606.

6. CONCLUSION AND RECOMMENDATION

The new tobacco products contain the following modifications compared to the corresponding original tobacco products:

- Deletion of non-FSC cigarette paper
- Addition of FSC cigarette paper

² Any tobacco product that can be sold under the FD&C Act (e.g., legally marketed in the United States) is eligible for modification under the Exemption Request pathway.

I concur with the conclusion of the scientific review that these modifications are minor modifications of a tobacco product in accordance with section 905(j)(3)(A)(i) of the FD&C Act. Section 900(1) of the FD&C Act defines 'additive' as "any substance the intended use of which results or may reasonably be expected to result, directly or indirectly, in its becoming a component or otherwise affecting the characteristic of any tobacco product (including any substances intended for use as a flavoring or coloring or in producing, manufacturing, packing, processing, preparing, treating, packaging, transporting, or holding), . . . " I concur with the scientific review that the deletion of non-FSC cigarette paper and the addition of FSC cigarette paper is an addition/deletion of a tobacco additive. In addition, it is my conclusion that, consistent with section 905(j)(3)(A)(ii) of the FD&C Act, an SE Report is not necessary to ensure that permitting the new tobacco products to be marketed would be appropriate for protection of the public health. At this time, based on the information available and CTP's scientific understanding and experience with non-FSC to FSC cigarette paper modifications that are limited to changes in tobacco additives and do not result in other changes to the tobacco product (e.g., no changes to blend, filter, design parameters such as ventilation, etc.), the benefit of using FSC cigarette paper in cigarettes to reduce household fires is anticipated to outweigh any potential increased health risks from the small increases in HPHC exposures that may occur from the use of FSC cigarette paper. Lastly, FDA finds, based on the information contained in the Exemption Requests and CTP's scientific understanding, that an exemption for these modifications are otherwise appropriate as required by section 905(j)(3)(a)(iii) of the FD&C Act. Therefore, the new tobacco products should be found exempt from the requirements of substantial equivalence under section 910(a)(3)(A) of the FD&C Act.

The original tobacco products are eligible for modification through the Exemption Request pathway because they can be legally marketed in the United States. The original products are grandfathered products (i.e., were commercially marketed in the United States other than exclusively in test markets as of February 15, 2007).

FDA has examined the environmental effects of finding the new tobacco products exempt and made a finding of no significant impact.

Exempt order letters should be issued for the new tobacco products in EX0000587 – EX0000606 and EX0000609 – EX0000628 as identified on the cover page of this review.