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Public Health England

By Email Only: Tobacco.Notifications@phe.gov.uk

IMPERIAL BRANDS PLC
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20 July 2020

Dear Sir

PHE Investigation – Menthol flavoured cigarettes

We are writing in response to your letter dated 14 July 2020.

Imperial Tobacco welcomes Public Health England's intervention in this matter. In particular, we are pleased to hear that you are working together with Trading Standards colleagues to ensure that any products that do not comply with the law are removed from the UK market.

We share these concerns and are ready to provide any assistance necessary to help ensure industry-wide compliance with the characterising flavour ban.

For the avoidance of doubt, we confirm that all Imperial Tobacco SKUs available in the UK since 20 May 2020 do not contain menthol, nor do they have any other characterising flavour. They fully comply with the Tobacco and Related Products Regulations 2016.

EU CEG submissions

Prior to the implementation of the characterising flavour ban on 20 May 2020 Imperial Brands undertook the exercise of removing previously reported menthol SKU entries from the EU CEG.

Unfortunately we have since realised that due to an administrative error, some menthol SKUs were not correctly removed. This meant that some inactive menthol SKUs remained visible as active in the EU CEG, despite the fact that they were withdrawn from the market prior to 20 May 2020.

The SKUs that remained visible on the EU CEG in error are as follows:

- 00010-20-00366 Superkings Green
- 00010-19-01307 Richmond Superkings Green
- 00010-20-00088 JPS VB Menthol KS
- 00010-20-00089 Windsor Blue
- 00010-20-00090 JPS VB Menthol SKS
- 00010-20-00096 Carlton Menthol Lights

We have now corrected the error and the above SKUs have been removed from the EU CEG to reflect the fact they have not been available on the UK market since 20 May 2020.

For completeness, we note that you also referenced some SKUs in your letter which do remain active (JPS LSS Lights KS and SKS). However, these are standard products and do not contain menthol, which can be confirmed in the relevant ingredient disclosures in the EU-CEG.

Registered in England
and Wales No: 3236483

Registered Office:
121 Winterstoke Road
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Green Filter SKUs

The following product details for the post 20 May 2020 Green Filter SKUs have been submitted via the EU CEG:

Product	EUID	Date of Submission	Submission Type
L&B Green Filter KS	00010-20-00105	04-02-2020	1
Richmond Green Filter KS	00010-20-00106	04-02-2020	1
JPS Play Green Filter SKS	00010-20-00104	04-02-2020	1
Richmond Green Filter SKS	00010-20-00107	04-02-2020	1
Carlton Green Filter SKS	00010-20-00286	04-02-2020	1
Windsor Blue Green Filter SKS	00010-20-00103	04-02-2020	1

The ingredient data referenced in these submissions verify that these products comply with the Tobacco Products Directive (2014/40/EU) and Tobacco and Related Products Regulations 2016.

We confirm that none of the above Green Filter SKUs contain menthol nor do they aim to create a menthol impression.

Please note that these SKUs have not yet been updated on the EU CEG to reflect their current brand name. For reference, the current reported name for each Green Filter SKU is listed in the table below:

Product	EUID	Current Reported name:
L&B Green Filter KS	00010-20-00105	Lambert & Butler LSS Lights KS VB
Richmond Green Filter KS	00010-20-00106	Richmond LSS Lights KS VB
JPS Play Green Filter SKS	00010-20-00104	JPS Player's LSS Lights SKS VB
Richmond Green Filter SKS	00010-20-00107	Richmond LSS Lights SKS VB
Carlton Green Filter SKS	00010-20-00286	Carlton LSS Lights SKS VB
Windsor Blue Green Filter SKS	00010-20-00103	Windsor Blue LSS Lights SKS VB

We are in the process of updating the submissions to ensure that they display the correct brand name – however please note that this does not affect the physical characteristics of the product listed under the relevant EUID in any way.

Trade advertising


Imperial's promotional activity in the trade press for Green Filter (including the examples highlighted in your letter) is consistent with the position described above. We make it clear that the Green Filter range does not contain menthol.

We assume the references to Imperial's products having a "menthol effect" towards the end of the letter is an error as we have never made such a claim.

Next steps

We trust that the above response addresses the questions raised in your letter. However, if you have any further questions in relation to our products (pre or post 20 May 2020) we would be happy to assist.

Yours sincerely,


Imperial Brands