CONFIDENTIAL

September 6, 2018

Saira David
Plain and Standardized Packaging Division
Tobacco Products Regulatory Office
Tobacco Control Directorate
Healthy Environments and Consumer Safety Branch
hc.pregs.sc@canada.ca

Re: Canada Gazette Part I, Notice Dated June 19, 2018 – Tobacco Products Regulations (Plain and Standardized Appearance) (the "Draft Regulations")

Dear Ms. David:

In response to Health Canada's request for comments on the Draft Regulations, please find enclosed the following documents on behalf of Rothmans, Benson & Hedges Inc.:

1. The first part of the submission includes our view on the treatment of all tobacco products in the Draft Regulations in the same way, and our belief that non-combustible products should be treated differently.
2. In support of the first part, the second part of the submission is a technical and scientific dossier related to the Electrically Heated Tobacco Product as part of the Tobacco Heating System prepared by Philip Morris International Inc., our parent company. Certain data and information contained in this document constitute trade secrets and confidential commercial information. The legal protections that apply to trade secrets and confidential information are hereby claimed under the applicable provisions of law. No part of this document may be publicly disclosed without the written consent of Philip Morris International Inc. of which Philip Morris Products S.A. is an affiliate. Philip Morris Products S.A. reserves all of its rights pursuant to the Access to Information Act in order to keep this document confidential and does not consent to the disclosure of this document to any third party.

Please note that RBH will also be submitting comments related to technical issues in the Draft Regulations as they relate to our tobacco products separately.

We look forward to your review and consideration of our submission. Please don't hesitate to contact us if you have any questions or require further information.

Kind regards,

Peter Luongo
Managing Director