

**Programmatic Environmental Assessment for Five  
Marketing Orders by R.J. Reynolds Tobacco Company**

**Prepared by Center for Tobacco Products  
U.S. Food and Drug Administration**

March 28, 2019

## Table of Contents

1.	Applicant and Manufacturer Information .....	3
2.	Product Information .....	3
3.	The Need for the Proposed Actions .....	3
4.	Alternative to the Proposed Actions .....	4
5.	Potential Environmental Impacts of the Proposed Actions and Alternatives – Manufacturing the New Products .....	4
5.1	Affected Environment.....	4
5.2	Air Quality.....	5
5.3	Water Resources.....	5
5.4	Soil, Land Use, and Zoning .....	5
5.5	Biological Resources .....	5
5.6	Regulatory Compliance .....	7
5.7	Socioeconomics and Environmental Justice.....	7
5.8	Solid Waste and Hazardous Materials .....	7
5.9	Floodplains, Wetlands, and Coastal Zones .....	7
5.10	Cumulative Impacts .....	8
5.11	Impacts of No Action Alternative.....	9
6.	Potential Environmental Impacts of the Proposed Actions and Alternatives – Use of the New Products .....	9
6.1.	Affected Environment.....	9
6.2.	Air Quality.....	9
6.3.	Environmental Justice.....	9
6.4.	Cumulative Impacts .....	11
6.5.	Impacts of No Action Alternative.....	12
7.	Potential Environmental Impacts of the Proposed Actions and Alternatives – Disposal of the New Products .....	12
7.1.	Affected Environment.....	12
7.2.	Air Quality.....	13
7.3.	Biological Resources .....	13
7.4.	Water Resources.....	13
7.6.	Socioeconomics and Environmental Justice.....	13
7.7.	Cumulative Impacts .....	14
7.8.	Impacts of No Action Alternative.....	14
8.	List of Preparers.....	15
9.	A Listing of Agencies and Persons Consulted .....	15
10.	References.....	15
	CONFIDENTIAL APPENDIX 1 .....	17
	Modifications: New Products as Compared with the Corresponding Original Products .....	17
	CONFIDENTIAL APPENDIX 2 .....	18
	First- and Fifth-Year Market Volume Projections for the New Products and Percentage of Cigarette Use in the United States Projected to be Attributed to the New Products.....	18

### 1. Applicant and Manufacturer Information

<b>Applicant Name:</b>	R.J Reynolds Tobacco Company
<b>Applicant Address:</b>	401 North Main Street Winston-Salem, NC 27101
<b>Manufacturer Name:</b>	R.J. Reynolds Tobacco Company
<b>Product Manufacturing Address:</b>	7855 King-Tobaccolville Road Tobaccolville, NC 27050

### 2. Product Information

#### New Product Names, Submission Tracking Numbers (STN), and Original Product Names

<b>New Product Name</b>	<b>STN</b>	<b>Original Product Name</b>
Camel Classic Menthol	EX0000303	Camel Filters Menthol Hard Pack
Camel Classic Filters Soft Pack	EX0000304	Camel Filters King Soft Pack
Camel Classic Filters	EX0000305	Camel Filters Hard Pack
Camel Classic Wides Menthol	EX0000306	Camel Wides Menthol Filters Hard Pack
Camel Classic Wides Menthol Silver	EX0000307	Camel Wides Lights Menthol Hard Pack

#### Product Identification

<b>Product Type</b>	Cigarette
<b>Product Subtype</b>	Combusted, filtered
<b>Product Quantity per Retail Unit</b>	Twenty cigarettes per pack with ten packs per carton.
<b>Product Package</b>	The packaging materials consist of a foil inner liner, inner frame paper, paper board box, and polypropylene outer wrap

### 3. The Need for the Proposed Actions

The proposed actions, requested by the applicant, are for Food and Drug Administration (FDA) to issue exemptions from substantial equivalence (SE) reporting for marketing orders under section 905(j)(3) of the Federal Food, Drug, and Cosmetic Act (FD&C Act) for five combusted, filtered cigarettes. A tobacco product that is modified by adding or deleting a tobacco additive, or increasing or decreasing the quantity of an existing tobacco additive, may be considered for exemption from demonstrating substantial equivalence if: (1) the product is a modification of another tobacco product and the modification is minor, (2) the modifications are to a tobacco product that may be legally marketed under the FD&C Act, (3) an SE Report is not necessary to ensure that permitting the tobacco product to be marketed would be appropriate for the protection of public health, (4) the modified tobacco product is marketed by the same organization as the original product, and (5) an exemption is otherwise appropriate.

The applicant wishes to introduce the new tobacco products into interstate commerce for commercial distribution in the United States. The applicant must obtain written notification that FDA has granted the products an exemption from demonstrating substantial equivalence under section 905(j)(3) before

submitting an abbreviated report. Ninety days after FDA receipt of the abbreviated report, the applicant may introduce or deliver for introduction into interstate commerce for commercial distribution the new products for which the applicant has obtained an exemption from demonstrating substantial equivalence.

The new products differ from the corresponding original products by minor changes in the filter tow, the tipping paper, and the monogram ink on the cigarette barrel (Confidential Appendix 1).

#### 4. Alternative to the Proposed Actions

The no-action alternative is FDA does not issue the Exemption Requests from demonstrating substantial equivalence for marketing orders for the new tobacco products.

#### 5. Potential Environmental Impacts of the Proposed Actions and Alternatives – Manufacturing the New Products

The Agency considered potential impacts to resources in the environment that may be affected by manufacturing the new products and found no significant impacts based on the Agency-gathered information and the following applicant-submitted information:

- Components of the new filter tows and tipping papers are commonly used in other products manufactured at the facility.
- The new products would not be commercially marketed simultaneously with the original products if marketing orders are granted for the new products.
- The new products are intended to compete with and eventually replace similar tobacco products currently manufactured at the facility.
- No facility expansion or new construction is expected due to manufacturing the new products.

##### 5.1 Affected Environment

The new products would be manufactured at the address listed in section 1 of this document (Figure 1).

**Figure 1. Location of the Manufacturer**



The manufacturing facility is in Forsyth County, NC in Headwaters Muddy Creek watershed, hydrologic unit code 03040101, which is the largest of the Yadkin River tributaries.<sup>1,2</sup> The facility is surrounded by woodlands and is bounded by the city of King, NC to the north; US 52 (a four-lane, divided highway) to the east; and mixed use residential, commercial, and agricultural land to the south and west.

The affected environment includes human and natural environments surrounding the facility.

## **5.2 Air Quality**

The Agency does not anticipate any new chemicals or new type of emissions would be released into the environment due to manufacturing the new products. The applicant stated that they do not anticipate any new chemicals to be released into the environment as a result of manufacturing the new products; accordingly, the applicant concluded that manufacturing the new products would not require any additional environmental controls for air emissions.

## **5.3 Water Resources**

The Agency does not anticipate that manufacturing the new products would cause the discharge of any new chemicals into water. The new products are intended to replace similar tobacco products currently manufactured at the facility. The applicant also stated that manufacturing the new products would not require any additional environmental controls for water discharges.

## **5.4 Soil, Land Use, and Zoning**

The Agency does not anticipate that manufacturing the new products would lead to changes in soil, land use, or zoning. The applicant stated that there would be no expected facility expansion or new construction due to manufacturing the new products. Therefore, there would be no zone change or land conversion of prime farmland, unique farmland, or farmland of statewide importance to non-agricultural use.

## **5.5 Biological Resources**

The Agency does not anticipate manufacturing the new products would jeopardize the continued existence of any listed species or result in the destruction or adverse modification of the habitat of any such species identified under the Endangered Species Act (ESA). The critical habitat and endangered species maps compiled by U.S. Fish and Wildlife Services (U.S. FWS) shows two threatened species (one bog turtle and one northern long-eared bat), one endangered plant, and one at-risk fresh water mussel are listed in Forsyth County.<sup>3,4</sup> The applicant also reviewed the U.S. FWS maps and stated that the manufacturing facility is not within or near a critical habitat, or endangered animal and plant species.

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<sup>1</sup> A watershed is an area of land where all bodies of water, such as; surface water from lakes, streams, reservoirs and wetlands, the underlying ground water, and rainfall, drain to a common outlet such as the outflow of a reservoir, mouth of a bay, or any point along a stream channel. See <https://water.usgs.gov/edu/watershed.html>.

<sup>2</sup> USGS. National Water Information System: Mapper. Available at: <https://maps.waterdata.usgs.gov/mapper/index.html>. Accessed May 23, 2018.

<sup>3</sup> U.S. Fish and Wildlife Services (U.S. FWS), available at: <https://www.fws.gov/raleigh/species/cntylist/forsyth.html>. Accessed February 27, 2019.

<sup>4</sup> Critical habitat map available at: <https://databasin.org/maps/new#datasets=d579d87eb54f4374a77ea53e7ef66449>. Accessed February 27, 2019.

## 5.6 Regulatory Compliance

The applicant stated that the manufacturing facility complies with all federal, state, and local environmental regulations. The agency verified the applicant's statement using information available on the Environmental Protection Agency (EPA)'s Enforcement and Compliance History Online (ECHO) database. ECHO information indicated that the facility is in compliance with the following air emission, storm water, and wastewater requirements::

- maintaining and complying with five separate Spill Prevention Control and Countermeasure plans, as required by EPA's oil pollution prevention regulations;
- reporting greenhouse gas emissions to EPA on an annual basis;
- submitting EPA Tier 2 to EPA TRI, permit # 27050RJRYN7855A expiring on July 1, 2018, and North Carolina Right-to-Know reports; and
- complying with Department of Homeland Security Chemical Antiterrorism Standards and with applicable solid and hazardous waste regulations.

The Agency's search of ECHO did not reveal any violations of federal environmental laws and regulations.<sup>5</sup> The applicant stated that the facility complies with the ESA and the Convention on International Trade in Endangered Species of Wild Fauna and Flora.

## 5.7 Socioeconomics and Environmental Justice

No changes on socioeconomics are anticipated due to manufacturing the new products. The Agency does not anticipate any impacts on employment revenue, or taxes because the new products are intended to replace similar tobacco products currently manufactured at the facility.

Manufacturing the new products would not disproportionately impact minority populations, because only 8% of the population within a three-mile radius of the manufacturing facility is minority per 2010 U.S. Census and American Community Survey data.<sup>6</sup>

## 5.8 Solid Waste and Hazardous Materials

The Agency does not foresee that the introduction of the new products would notably affect the current manufacturing waste generated from the facility's production of all combusted, filtered cigarettes. The Agency anticipates the waste generated due to manufacturing the new products would be released to the environment and disposed of in landfills in the same manner as any other waste generated from any other products manufactured in the same facility. The applicant stated that manufacturing the new products would not require any additional environmental controls for solid waste disposal. Therefore, no new or revised waste permit or construction of new waste management facility is expected.

## 5.9 Floodplains, Wetlands, and Coastal Zones

There would be no facility expansion due to manufacturing the new products and the applicant did not propose any land disturbance; therefore, there would be no effects on floodplains, wetlands, or coastal zones.

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<sup>5</sup> U.S. EPA ECHO Detailed Facility Report: R.J. Reynolds Tobacco Company, Richmond, VA. Available at: <https://echo.epa.gov/detailed-facility-report?fid=110000345225>. Accessed February 27, 2019.

## 5.10 Cumulative Impacts

The Agency does not anticipate the proposed actions to incrementally increase or change the chemicals released to the environment from the tobacco manufacturing facility. A search in EPA's TRI database showed that in 2017, R.J. Reynold's manufacturing facility in Tobaccoville, North Carolina released 8,956 pounds of ammonia and 17,839 pounds of nicotine and nicotine salts to air (a total of 26,795 pounds), and 2,515 pounds of ammonia and 4,547 pounds of nicotine and nicotine salts (a total of 7,062 pounds) offsite, but no TRI-reportable chemicals were released to water or land (Table 1).<sup>7</sup> No other hazardous air pollutants were reported. Ammonia's adverse health effects are ocular and respiratory; nicotine and nicotine salts have known adverse developmental effects.<sup>8</sup> The TRI database search did not show that the R.J. Reynolds manufacturing facility disposed of, treated, or released into the environment any other reportable toxicants associated with manufacturing tobacco products. In addition, EPA's ECHO database did not show that the facility released the following reportable criteria pollutants: ozone, lead, particulate matter, or sulfur dioxide, at or above the reportable threshold levels to air.

**Table 1 Management of Chemical Waste Associated with Manufacturing Tobacco Products at R.J. Reynolds Facility in 2017**

Production-Related Waste Managed or Released			Chemical Mass (pounds)
Recycled			0
Energy Recovery			0
Treated*			3,040
<i>Subtotal Waste Managed</i>			<i>3,040</i>
On-Site Release	Air	Ammonia	8,956
		Nicotine and Nicotine Salts	17,839
	Water	Ammonia	0
		Nicotine and Nicotine Salts	0
	Land	Ammonia	0
		Nicotine and Nicotine Salts	0
Off-Site Release		Ammonia	2,515
		Nicotine and Nicotine Salts	4,547
<i>Subtotal Waste Released</i>			<i>33,857</i>
<b>Total Production-Related Waste</b>			<b>36,897</b>
* Ammonia only			

<sup>6</sup> U.S. EPA ECHO Detailed Facility Report: Demographic profile of surrounding area (3 miles). Available at: <https://echo.epa.gov/detailed-facility-report?fid=110000345225>. Accessed February 27, 2019.

<sup>7</sup> U.S. Environmental Protection Agency (EPA). *TRI Data Form R & A Download*. Available at: [https://www3.epa.gov/enviro/facts/tri/form\\_ra\\_download.html](https://www3.epa.gov/enviro/facts/tri/form_ra_download.html). Searched on February 27, 2019.

<sup>8</sup> U.S. EPA. myRight-to-Know, available at: <https://myrtk.epa.gov/info>. The site allows for searching the industrial facilities that manage toxic waste chemicals by entering the facility's address and clicking on the facility's location on the map. Accessed February 27, 2019.

According to the North Carolina Department of Environmental Quality, water quality in Headwaters Muddy Creek watershed where the facility is located, is relatively good compared to other sub basins in the greater Yadkin-Pee Dee River basin.<sup>9</sup>

The applicant stated that manufacturing the new products would not require revised or new air, waste water, or storm water permits.

### **5.11 Impacts of No Action Alternative**

The environmental impacts of the no-action alternative would not change the existing condition of manufacturing cigarettes, as many similar tobacco products would continue to be manufactured in the facility.

## **6. Potential Environmental Impacts of the Proposed Actions and Alternatives – Use of the New Products**

The Agency considered potential impacts to resources in the environment that could be affected by use of the new products and found no significant impacts based on Agency-gathered information and the applicant's submitted information. Included in the information the Agency considered were the projected market volumes for the new products and the documented decline in cigarette use in the United States.

### **6.1. Affected Environment**

The affected environment includes human and natural environments in the United States because the marketing orders would allow for the new tobacco products to be sold to consumers nationwide.

### **6.2. Air Quality**

The Agency does not anticipate new chemicals would be released into the environment as a result of use of the new products, relative to chemicals released into the environment due to use of other cigarettes already on the market because (1) the combustion products from the new products would be released in the same manner as the combustion products of the original products and any other marketed cigarettes; (2) the new products are expected to compete with, or replace, other currently marketed cigarettes, so the Agency does not expect that new or increased air emissions would be associated with use of the new products (Confidential Appendix 2); and (3) the ingredients in the new products are used in other currently marketed tobacco products.

### **6.3. Environmental Justice**

No new emissions are expected due to use of the new products. Therefore, there would be no new disproportionate impacts on minority or low-income populations.

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<sup>9</sup> North Carolina Department of Environmental Quality. *Yadkin River Headwaters*. Available at: [https://files.nc.gov/ncdeq/Water%20Quality/Planning/BPU/BPU/Yadkin/Yadkin%20Plans/2010%20Plan/2\\_03040101%20Yadkin%20River%20Headwaters-2010.pdf](https://files.nc.gov/ncdeq/Water%20Quality/Planning/BPU/BPU/Yadkin/Yadkin%20Plans/2010%20Plan/2_03040101%20Yadkin%20River%20Headwaters-2010.pdf). Accessed Jun 14, 2018.



#### 6.4. Cumulative Impacts

The impacts from use of combusted tobacco products include exposure to secondhand smoke (SHS) produced from burned cigarettes. Particles emitted by smoking may remain on surfaces, be re-emitted back into the gas phase, or react with oxidants and other compounds in the environment to yield secondary pollutants, thirdhand smoke (THS). These pollutants coexist in mixtures in the environment alongside SHS (Burton, 2011; Matt et al., 2011).

There is no safe level of exposure to SHS (U.S. Department of Health and Human Services, 2006a and 2006b). Even low levels of SHS can harm children and adults in many ways, including the following:

- The U.S. Surgeon General estimates that living with a smoker increases a nonsmoker's chances of developing lung cancer by 20 to 30% (U.S. Department of Health and Human Services, 2014).
- Exposure to SHS increases school children's risk for ear infections, lower respiratory illnesses, more frequent and more severe asthma attacks, and slowed lung growth. It can cause coughing, wheezing, phlegm, and breathlessness (U.S. Department of Health and Human Services, 2006a and 2006b).
- SHS causes more than 40,000 deaths a year (U.S. Department of Health and Human Services, 2014).

However, the use of cigarettes in the United States is declining, per the U.S. Alcohol and Tobacco Tax and Trade Bureau (TTB) Statistical Release reports, (Figure 2).<sup>10</sup> This likely is responsible for the decline in SHS exposure observed in several studies that evaluated the levels of SHS exposure in children and nonsmokers living in homes of smokers (Homa et al., 2015; Yao et al., 2016). Despite the considerable ethnic and racial disparities in SHS exposure in vulnerable populations, data from the National Health and Nutrition Examination Survey showed a decline in SHS exposure from 1999-2000 to 2011-2012 with the highest prevalence of exposure among non-Hispanic subpopulations (46.8%), compared to Mexican Americans (23.9%) and non-Hispanic whites (21.8%) in 2011-2012 (Homa et al., 2015).

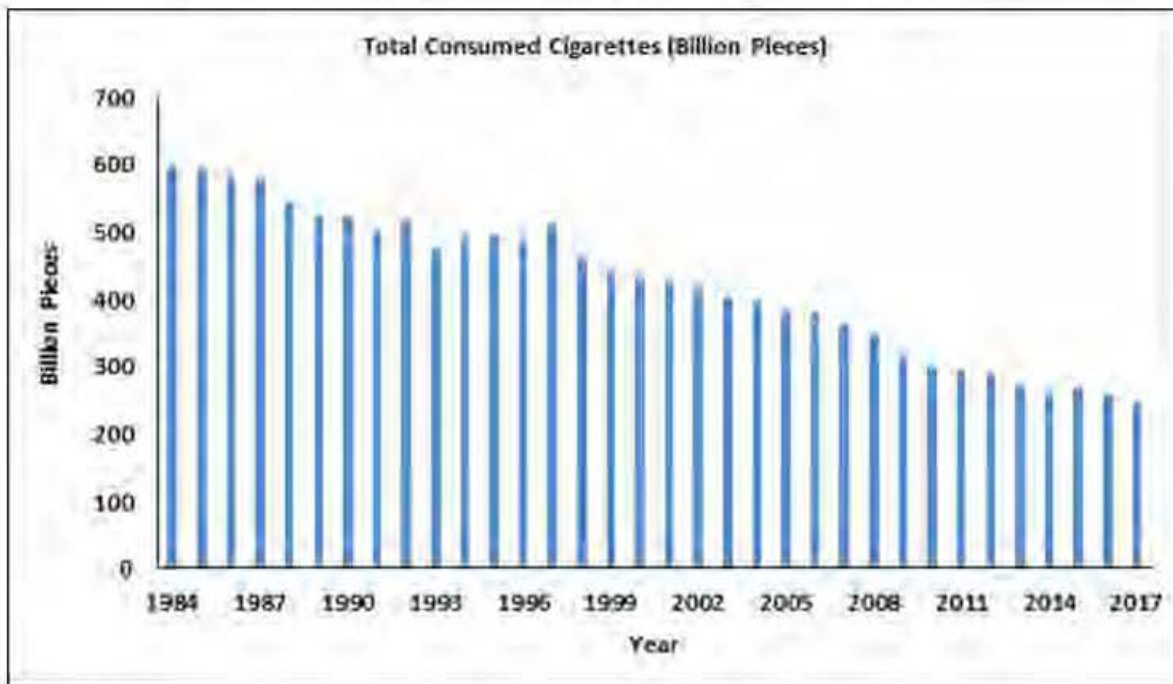
There were also significant declines in SHS exposure prevalence noted in the 2000 and 2010 National Health Interview Survey Cancer Control Supplements. SHS exposure declined in Hispanics from 16.3% in 2000 to 3.1% in 2010, non-Hispanic Asians from 13.4% in 2000 to 3% in 2010, and non-Hispanic blacks from 31.2% in 2000 to 11.5% in 2010 as compared to exposures in non-Hispanic whites, which declined from 25.8% in 2000 to 9.7% in 2010 (Yao et al., 2016).

As of September 2018, 28 states and the District of Columbia had implemented comprehensive smoke-free laws (American Lung Association, 2019). Such laws are expected to reduce the levels of non-user exposure to SHS and THS.

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<sup>10</sup> U.S. Alcohol and Tobacco Tax and Trade Bureau (TTB) statistical data available at: <https://www.ttb.gov/tobacco/tobacco-stats.shtml>. Accessed March 7, 2018.

Figure 2. Cigarette Consumption in the United States, 1984 – 2017



#### 6.5. Impacts of No Action Alternative

The environmental impacts of the no-action alternative would not change the existing condition of use of cigarettes, as many similar tobacco products would continue to be marketed.

### 7. Potential Environmental Impacts of the Proposed Actions and Alternatives – Disposal of the New Products

The Agency considered potential impacts to resources in the environment that may be affected by disposal of the new products. Based on publicly available information such as the documented continuous decline of cigarette use in the United States and the applicant's submitted information, including market volume projections for the new products, the Agency found no significant impacts.

#### 7.1. Affected Environment

The affected environment includes human and natural environments in the United States because the marketing orders would allow for the new tobacco products to be sold to consumers nationwide.

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<sup>30</sup> U.S. Alcohol and Tobacco Tax and Trade Bureau (TTB) statistical data available at: <https://www.ttb.gov/tobacco/tobacco-stats.shtml>. Accessed March 7, 2018.

## **7.2. Air Quality**

The Agency does not anticipate disposal of the products or the packaging material would lead to the release of new or increased chemicals into the air.

No changes in air quality are anticipated from disposal of the cigarette butts of the new products. The chemicals in the new products' cigarette butts are commonly used in other currently marketed cigarettes. Because the new products are anticipated to compete with or replace other currently marketed cigarettes, the butt waste generated from the new products would replace the same type of waste. Therefore, the fate and effects of any materials emitted into the air from disposal of the new products are anticipated to be the same as any materials from other cigarettes disposed of in the United States.

No changes in air quality from disposal of the new products' package materials would be expected because (1) the paper and plastic components of the packages are more likely to be recycled or at least a portion of the packaging waste is likely to be recycled, (2) the packaging materials are commonly used in the United States, and (3) the waste generated due to disposal of the new products' packaging is a minuscule portion of the municipal solid waste per FDA's experience in evaluating the packaging waste generated from cigarettes.

## **7.3. Biological Resources**

The proposed actions are not expected to change the continued existence of any endangered species or result in the destruction or adverse modification of the habitat of any such species, as prohibited under the U.S. ESA. Although disposal of smoldering cigarettes has been implicated in many fire incidents,<sup>11,12</sup> the new products are not expected to change the fire frequency as the disposal of the new products would be the same as the disposal of cigarettes that are currently marketed in the United States.

## **7.4. Water Resources**

No changes in any impacts on water resources are expected due to disposal of the cigarette butts from the new products because the chemicals in the new products are the same as in currently marketed cigarettes and the new products are anticipated to compete with or replace other currently marketed cigarettes.

## **7.5. Solid Waste**

The Agency does not foresee that the introduction of the new products would notably affect the current cigarette butt waste generated from all combusted, filtered cigarettes. The waste generated due to disposal of the new products and packaging materials would be in the same manner as any other waste generated from any other combusted, filtered cigarettes manufactured in the United States. The number of cigarette butts generated would be equivalent to the market projections (Confidential Appendix 2) and a portion of those are littered.

## **7.6. Socioeconomics and Environmental Justice**

The Agency does not anticipate changes in impacts on socioeconomic conditions or environmental justice from disposal of the new products. The waste generated due to disposal of the new products would be handled in the same manner as the waste generated from disposal of other cigarettes in the United States.

No new emissions are expected due to disposal of the new products; therefore, there would be no new disproportionate impacts on minority or low-income populations.

### **7.7. Cumulative Impacts**

A major existing environmental consequence of the use of the new products, as well as other conventional cigarettes, is littering of discarded cigarette filters or butts, which can persist in the environment for more than 10 years (Novotny and Zhao, 1999). Cigarette butts are among the most common forms of litter found on beaches (Claereboudt, 2004; Smith et al., 1997), near streams, night clubs (Becherucci and Pon, 2014), bus stops (Wilson, et al., 2014), roads, and streets (Healton, et al., 2011; Patel, et al., 2013). Cigarette butts have been found at densities averaging more than four cigarette butts per meter squared of urban environments (Seco Pon and Becherucci, 2012).

Compounds in cigarette butts can leach out into water, potentially threatening human health and the environment, especially marine ecosystems (Kadir and Sarani, 2015). The environmental toxicity of cigarette butts due to air emissions is not well studied. The chemicals in cigarette butts can be the original chemicals in the unsmoked cigarettes or the pyrolysis and distillation products deposited in the cigarette butts. Airborne emissions from cigarette butts after disposal depend on the environmental conditions and the chemicals in the butts. These emissions can be influenced by several factors, such as the cigarette brand, cigarette length, filter material, types of tobacco, ingredients in the cigarette and tobacco fillers, number of puffs, and the mass transfer behavior of combustion products along the cigarette.<sup>13</sup>

However, the cumulative impacts from cigarette butts is declining because the use of cigarettes in the United States is declining.

### **7.8. Impacts of No Action Alternative**

The environmental impacts of the no-action alternative would not change the existing condition of disposal of cigarettes and cigarette packaging, as many other similar tobacco products would continue to be marketed.

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<sup>11</sup> National Fire Protection Association. The smoking-material fire problem. Available at: <https://www.nfpa.org/News-and-Research/Fire-statistics-and-reports/Fire-statistics/Fire-causes/Smoking-Materials>. Accessed May 22, 2018.

<sup>12</sup> UC Davis Health News. Available at: <https://www.ucdmc.ucdavis.edu/publish/news/newsroom/2763>. Accessed May 22, 2018.

<sup>13</sup> NIST Technical Report 8147 available at: <http://dx.doi.org/10.6028/NIST.IR.8147>. Accessed April 24, 2018.

## 8. List of Preparers

The following individuals were primarily responsible for preparing and reviewing this programmatic environmental assessment (PEA):

### **Primary Reviewer:**

Dilip Venugopal, Ph.D., Center for Tobacco Products

Education: M.S. in Ecology and Ph.D. in Entomology

Experience: Sixteen years in various scientific activities

Expertise: NEPA analysis, environmental impact analysis and risk assessment, applied ecology, geo-statistics

### **Secondary Reviewer:**

Hoshing W. Chang, Ph.D., Center for Tobacco Products

Education: M.S. in Environmental Science and Ph.D. in Biochemistry

Experience: Ten years in NEPA practice

Expertise: NEPA analysis, environmental risk assessment, wastewater treatment

## 9. A Listing of Agencies and Persons Consulted

Not applicable.

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**CONFIDENTIAL APPENDIX 1**

**Modifications: New Products as Compared with the Corresponding Original Products**

<b>STN</b>	<b>Component</b>	<b>Modification</b>
EX0000303	Filter tow	Deletion of filter tow
EX0000304		Addition of alternate filter tow
EX0000305	Tipping paper	Deletion of cork tipping paper
EX0000306		Addition of alternate cork-on-white tipping paper
EX0000307	Monogram ink	Deletion of printed monogram ink on the barrel
		Addition of alternate printed monogram ink on the barrel

**CONFIDENTIAL APPENDIX 2**

**First- and Fifth-Year Market Volume Projections for the New Products and Percentage of Cigarette Use in the United States Projected to be Attributed to the New Products**

First- and fifth-year market volume projections for the new products were compared to the total forecasted use of cigarettes in the United States.<sup>14</sup> Each new product would account for a fraction of a percent of the forecasted cigarette use in the United States. In addition, the applicant stated that they intend to discontinue marketing the original products if marketing orders are issued for the new products and that the new products would replace the currently marketed original products.

STN	Projected Market Volume			
	First Year		Fifth Year	
	New Product (Cigarettes)	New Product as a Percent of Total Cigarettes Used <sup>15</sup>	New Product (Cigarettes)	New Product as a Percent of Total Cigarettes Used <sup>16</sup>
EX0000303	(b) (4)			
EX0000304				
EX0000305				
EX0000306				
EX0000307				
<b>Total</b>				

<sup>14</sup> The Agency used historical data regarding total use of cigarettes from 2002 to 2017 to mathematically estimate the total amount of cigarettes used in the United States. Using the best-fit trend line with an R<sup>2</sup> value of 0.9786, the forecasted number of cigarettes that would be used in the United States is estimated at 236.58 billion cigarettes in the first year and 209.83 billion cigarettes in the fifth year of marketing the new products.

<sup>15</sup> Projected Market Occupation of the New Product in the United States (%) =  $\frac{\text{Projected Market Volume of the New Products (cigarette pieces)}}{\text{Projected Use of Cigarettes in United States (cigarette pieces)}} \times 100$

<sup>16</sup> Ibid.