

25 SEP 1989

Reg. Authority  
Canada

Imperial Tobacco Limited/Limitée



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September 19, 1989

Mr. H.F. Dymond,  
B.A.T. (U.K. & Export) Ltd.,  
Research & Development Centre,  
Regent's Park Road,  
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Dear Harry:

Many thanks for your assistance concerning smoke methodologies. Enclosed are copies of the Tobacco Products Control Act (Bill C-51), the Tobacco Products Control Regulations and Amendments to the Regulations as you requested.

I must caution you concerning some very confusing wording in the Regulations, for example, paragraph 12 (1)(b). The government had to use such convoluted wording in the Regulations in order to render non-applicable certain requirements set in the Act itself.

The Act requires that all smokeable tobacco products be labelled with average tar, nicotine and carbon monoxide in smoke. Realizing, after the fact, that no approved methods existed for measuring these constituents from cigar and pipe tobacco smoke, the government regulators wrote into the regulations that such numbers be printed on packages in the same way as had been done prior to enactment of the law. Since no numbers have ever been printed on packages of cigars and pipe tobacco, these two classes of products were exempt.

With respect to fine cut tobaccos (roll-your-own), Health and Welfare refused to use the same logic probably because of the importance of fine cuts in the Canadian market. Consequently, specifications (which are incomplete) for a standard tube with which to measure tar, nicotine and carbon monoxide are presented in the Schedule to the Regulations. The Canadian Tobacco Manufacturers' Association, while disagreeing with the method imposed by Health and Welfare, made suggestions, which were accepted, to complete the standard tube specifications and make the method workable. For your benefit, I have also enclosed specifications for the standard tube. Tar deliveries of fine cut products available in Canada are in the 18 to 24 mg range when measured with the standard tube. If one uses brand name tubes commercially available in Canada, tar deliveries could range anywhere from 6 mg to 32 mg per fine cut cigarette.

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I hope that these points will help clarify some of the more confusing aspects of the law. If you wish any further clarification regarding Bill C-51 and its regulations, please let me know.

With kind regards.

Yours sincerely,



Gaetan DuPlessis  
Manager - Support Services  
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/pda  
encl.

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