

Public consultation on the implementation of an EU system for traceability and security features pursuant to Art. 15 and 16 of the Tobacco Products Directive 2014/40/EU

Regarding the initial table submitted, we would comment along the following lines:

- Who? Governance model: **A3 Mixed**
 - Information come from the industry as a necessity and information compliance with the regulation is practically delivered by producer as it is the only source possible for many of the information required.
 - Compliance is checked by Government by supply of physical/numerical unique IDs per pack tracked from supply to producer to application and shipping followed later on by supply chain control.
 - Activation of Ids supplied are under government control once information supplied by the industry. Inactivated Ids are worthless.
 - Global production declaration, general accounting and capacity vs sale reconciliation per site complement unique ID supply for unique packs.
- Where? Data storage location: **N/A**
 - Simpler technically if centralized
 - Operationally and politically more pragmatic if decentralized
- How? Allowed data carriers **C2**
 - Should be chosen among solutions which are easy to read and standards both for the industry and controllers.
 - To allow innovations to jump into the system any added data carrier should be proven interoperable through availability of checking software to all countries.
- When? Delays in reporting events **D1**
 - Modern technology allows almost real time to be the requirement
- How? Security feature **S1**
 - Affixing allows control pre and post production without being active on the site on daily basis with machines or personal. Industry in charge of delivering the required information linked to the secured data carrier.