



# **EU systems for traceability and security features of tobacco products**

**- Webinar for economic operators -**

Directorate General for Health and Food Safety  
European Commission

**Brussels, 16 April 2018**

**Please note that any views expressed in this presentation may in no way be regarded as stating an official position of the Commission.**

- Is it possible to transmit traceability data after the delivery (to wholesale warehouse) of returned cigarettes, during sell-by date periods, instead of recording that data before loading the products on at the place of the retailer who returns these products.
- Is there any unified EU solution/recommendation regarding the costs for purchasing and operating scanning equipment throughout the distribution chain, which have to be covered by manufacturers/importers?
- We kindly ask the Commission to clarify towards Member States that UIs have to be transmitted electronically in any case and that a physical delivery must be seen as optional.
- Could the Commission confirm that an obligation to have UIs on stamps which precludes the possibility of electronic delivery is contrary to the text of the Implementing Regulation?

- Is the Commission aware of the introduction of an export barrier for European-based manufacturers by imposing UIDs on export goods? What has the Commission undertaken so far to avoid the introduction of such an export barrier?
- By what date must the EOID code registration for retailers be completed? Is the date the same for retailers that sell only OTPs as it is for retailers that sell all tobacco products?
- How does the Commission plan to ensure that the implementation of the registration process across the vast universe of retailers within the EU runs smoothly and is not undermined by duplications, omissions and misunderstandings?
- What sanctions will apply to delays or incorrect implementation of the extensive range of tasks required by the regulations?

- In the case of the sale of individual cigars and/or cigarillos, which come in boxes of multiples but are sold singly. Does the UI have to be on the single unit as well as the box that it came from?
- Up to what point does the tracking system end? Is it to trace the route as far as the point of import in the country, or as far as the retailer?
- Could the Commission please reconfirm the costs quoted in the Impact Assessment which for UI issuers for all tobacco products in the whole EU will be € 14 MM. We understand that this figure was taking into account aggregation codes that now would not necessarily be generated by ID issuer as per the first draft IA.
  - Would the Commission intervene if a Member State allows the UI issuer to impose the costs that are much higher than the benchmarks mentioned in the Impact Assessment?



**THANK YOU  
FOR YOUR ATTENTION**