



EU systems for traceability and security features of tobacco products

- Webinar for economic operators -

Directorate General for Health and Food Safety
European Commission

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

- The unique identifier is incompatible with existing packaging regulations in several third countries. What will the European Commission do to ensure that European manufacturers can still export their products?
- Can the European Commission commit to review the contracts between manufacturers and primary repository providers as soon as possible (i.e. as soon as submitted)? This could help in speeding up the selection process for the secondary repository.
- Will the implementation date for the new track and trace regulation in Ireland be aligned with the rest of Europe's implementation date.
- How does the EU Commission intend to prevent market access restrictions that are due to different Security Features? Is the Commission thinking about recommending to the Member States to mutually recognize each other's Security Features?

- We'd like to ask the Commission what specific measures it intends to take to make sure that logistics companies and their subcontractors will be able to meet the provisions of the Implementing Acts in time?
- Is the interpretation that transport companies do not need to register correct?
- Trans-loading: who and when should a transport agency take/apply for an ID and how will it work?
- If we take in consideration that a customer send in return some unit lever, how will the system work? What does a wholesaler need?
- Most transporting companies use transship points for goods delivery (PPL, GLS, Post, DPD etc.). So these transship points are not "facilities" in accordance with the directive but only places for transshipment?

- How to fill in the invoiced amount if the delivery includes also products that are not tracked by the T&T system?
- Is it possible to send the report on payments within one invoice repeatedly in case of partial payments? Is the "Payment_Invoice" (Form 4.3) box filled with "1" for the last payment?
- It is possible to deliver goods with delivery notes and issue a collective invoice once in the whole time period? Would the invoice include the unique identifiers from all the collected delivery notes?
- How to discard damaged goods from the records when there are no identifiers available (stolen, totally damaged etc.)?
- How to return goods which are recorded as located at a retailer?

- Who sends the report on arrival and delivery of goods to the last subject, i.e. a retail store? Is dispatch automatically considered as delivery?
- Delivery notes are sent to different facilities (branch offices with different registration UI) but the facilities are not stated in the invoice data, only the recipient's registration. Is it possible to include all delivery notes in the data of the collective invoice?
- Is there a duty to issue an order always before an invoice is issued or goods are dispatched?
- How to mark a payment collected by a transporter (Form 4.3) that delivers a parcel to a retail store and then sends it to the sender's account? "Payment Type" (1,3 or 4)
- Is it necessary to state clearly that the actual manufacturer is responsible for the records and marking the products with unique identifiers and uses its own manufacturer's identification number for this purpose?



**THANK YOU
FOR YOUR ATTENTION**