

Targeted stakeholder consultation on the implementation of an EU system for traceability and security features pursuant to Articles 15 and 16 of the Tobacco Products Directive 2014/40/EU

Fields marked with * are mandatory.

This is a targeted stakeholder consultation. The purpose of this consultation is to seek comments from stakeholders:

- directly affected by the upcoming implementation of an EU system for traceability and security features pursuant to Articles 15 and 16 of the new Tobacco Products Directive (Directive 2014/40/EU), or
- considering to have special expertise in the relevant areas.

In the Commission's assessment, the following stakeholders, including their respective associations, are expected to be directly affected:

1. manufacturers of finished tobacco products,
2. wholesalers and distributors of finished tobacco products,
3. providers of solutions for operating traceability and security features systems,
4. governmental and non-governmental organisations active in the area of tobacco control and fight against illicit trade.

Not directly affected are retailers and upstream suppliers of tobacco manufacturers (except the solution providers mentioned in point 3 above).

The basis for the consultation is the Final Report to the European Commission's Consumers, Health and Food Executive Agency (CHAFAEA) in response to tender n° EAHC/2013/Health/11 concerning the provision of an analysis and feasibility assessment regarding EU systems for tracking and tracing of tobacco products and for security features (hereafter the Feasibility Study). The Feasibility Study was published on 7 May 2015 and is available at http://ec.europa.eu/health/tobacco/docs/2015_tpd_tracking_tracing_frep_en.pdf. The interested stakeholders are advised to review the Feasibility Study before responding to this consultation.

The comments received in the course of this consultation will be an input to the further implementation work on a future EU system for traceability and security features. In particular, the comments will be taken into account in a follow-up study.

Stakeholders are invited to submit their comments on this consultation at the following web-address <https://ec.europa.eu/eusurvey/runner/trace> until 31 July 2015. The web-based survey consists of closed and open questions. For open questions stakeholders will be asked to provide comments up to the limit of characters indicated in the question or to upload (a) separate document(s) in PDF format up to the limit of total number of standard A4 pages (an average of 400 words per page) indicated in the question. Submissions should be - where possible - in English. For a corporate group one single reply should be prepared. For responses from governmental organisations, which are not representing a national position, it should be explained why the responding body is directly affected by the envisaged measures.

The information received will be treated in accordance with Regulation 45/2001 on the protection of individuals with regard to the processing of personal data by the Community (please consult the [privacy statement](#)). Participants in the consultation are asked not to upload personal data of individuals.

The replies to the consultation will be published on the Commission's website. In this light no confidential information should be provided. If there is a need to provide certain information on a confidential basis, contact should be made with the Commission at the following email address: SANTE-D4-SOHO-and-TOBACCO-CONTROL@ec.europa.eu with a reference in the email title: "Confidential information concerning targeted stakeholder consultation on the implementation of an EU system for traceability and security features". A meaningful non-confidential version of the confidential information should be submitted at the web-address.

Answers that do not comply with the specifications cannot be considered.

A. Respondent details

*A.1. Stakeholder's main activity:

- a) Manufacturer of tobacco products destined for consumers (finished tobacco products)
- b) Operator involved in the supply chain of finished tobacco products (excluding retail)
- c) Provider of solutions
- d) Governmental organisation
- e) NGO
- f) Other

*A.1.c. Please specify:

- i) Provider of solutions for tracking and tracing systems (or parts thereof)
- ii) Provider of solutions for security features (or parts thereof)
- iii) Data Management Providers (or parts thereof)

*A.2. Contact details (organisation's name, address, email, telephone number, if applicable name of the ultimate parent company or organisation) - if possible, please do not include personal data

Text of 1 to 800 characters will be accepted

[REDACTED]
Brand Protection Director - EU, Authentix

[REDACTED]
[REDACTED]
[REDACTED]

7 Chessingham Park
Dunnington, York YO19 5SE UK

*A.3. Please indicate if your organisation is registered in the Transparency Register of the European Commission (unless 1d):

Yes No

*A.4. Extract from the trade or other relevant registry confirming the activity listed under 1 and where necessary an English translation thereof.

• **a1397ac6-e3df-47bd-99f7-9e1a017f7f72/Authentix Brand Overview -Presentation- Update July 2015 - JW Brand Owner.pptx**

B. Options proposed in the Feasibility Study

B.1. Please rate the appropriateness of each option for tracking and tracing system set out in the Feasibility Study in terms of the criteria listed in the tables below

B.1.1. Option 1: an industry-operated solution, with direct marking on the production lines carried out by tobacco manufacturers (for further details on this option, please consult section 8.2 of the Feasibility Study)

| | Appropriate | Somewhat appropriate | Neutral | Somewhat inappropriate | Inappropriate | No opinion |
|---|-----------------------|-----------------------|-----------------------|------------------------|-----------------------|----------------------------------|
| *Technical feasibility | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Interoperability | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Ease of operation for users | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *System integrity (e.g. low risk of manipulation) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Potential of reducing illicit trade | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Administrative/financial burden for economic operators | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Administrative/financial burden for public authorities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

B.1.2. Option 2: a third party operated solution, with direct marking on the production lines carried out by a solution or service provider (for further details on this option, please consult section 8.3 of the Feasibility Study)

| | Appropriate | Somewhat appropriate | Neutral | Somewhat inappropriate | Inappropriate | No opinion |
|--|-----------------------|-----------------------|-----------------------|------------------------|-----------------------|----------------------------------|
| *Technical feasibility | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Interoperability | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Ease of operation for users | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *System integrity (e.g. low risk of manipulation) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Potential of reducing illicit trade | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| * Administrative/financial burden for economic operators | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| * Administrative/financial burden for public authorities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

B.1.3. Option 3: each Member State decides between Option 1 and 2 as to an entity responsible for direct marking (manufacture or third party) (for further details on this option, please consult section 8.4 of the Feasibility Study)

| | Appropriate | Somewhat appropriate | Neutral | Somewhat inappropriate | Inappropriate | No opinion |
|--|-----------------------|-----------------------|-----------------------|------------------------|-----------------------|----------------------------------|
| *Technical feasibility | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Interoperability | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Ease of operation for users | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *System integrity (e.g. low risk of manipulation) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Potential of reducing illicit trade | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| * Administrative/financial burden for economic operators | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| * Administrative/financial burden for public authorities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

B.1.4. Option 4: a unique identifier is integrated into the security feature and affixed in the same production process (for further details on this option, please consult section 8.5 of the Feasibility Study)

| | Appropriate | Somewhat appropriate | Neutral | Somewhat inappropriate | Inappropriate | No opinion |
|---|-----------------------|-----------------------|-----------------------|------------------------|-----------------------|----------------------------------|
| *Technical feasibility | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Interoperability | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Ease of operation for users | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *System integrity (e.g. low risk of manipulation) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Potential of reducing illicit trade | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Administrative/financial burden for economic operators | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Administrative/financial burden for public authorities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

B.1.5. Please upload any additional comments on the options referred to in question B.1 (max. 5 pages)

B.2. Please rate the appropriateness of each option for security features set out in the Feasibility Study in terms of the criteria listed in the tables below

B.2.1. Option 1: a security feature using authentication technologies similar to a modern tax stamp
 (for further details on this option, please consult section 9.2 of the Feasibility Study)

| | Appropriate | Somewhat appropriate | Neutral | Somewhat inappropriate | Inappropriate | No opinion |
|--|-----------------------|-----------------------|-----------------------|----------------------------------|----------------------------------|-----------------------|
| *Technical feasibility | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| *Interoperability | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| *Ease of operation for users | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| *System integrity (e.g. low risk of manipulation) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| *Potential of reducing illicit trade | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| * Administrative/financial burden for economic operators | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| * Administrative/financial burden for public authorities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

B.2.2. Option 2: reduced semi-covert elements as compared to Option 1 (for further details on this option, please consult section 9.3 of the Feasibility Study)

| | Appropriate | Somewhat appropriate | Neutral | Somewhat inappropriate | Inappropriate | No opinion |
|--|-----------------------|-----------------------|-----------------------|------------------------|----------------------------------|-----------------------|
| *Technical feasibility | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| *Interoperability | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| *Ease of operation for users | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| *System integrity (e.g. low risk of manipulation) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| *Potential of reducing illicit trade | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| * Administrative/financial burden for economic operators | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| * Administrative/financial burden for public authorities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

B.2.3. Option 3: the fingerprinting technology is used for the semi-covert and covert levels of protection (for further details on this option, please consult section 9.4 of the Feasibility Study)

| | Appropriate | Somewhat appropriate | Neutral | Somewhat inappropriate | Inappropriate | No opinion |
|--|-----------------------|-----------------------|-----------------------|------------------------|----------------------------------|-----------------------|
| *Technical feasibility | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| *Interoperability | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| *Ease of operation for users | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| *System integrity (e.g. low risk of manipulation) | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| *Potential of reducing illicit trade | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| * Administrative/financial burden for economic operators | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| * Administrative/financial burden for public authorities | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

B.2.4. Option 4: security feature is integrated with unique identifier (see Option 4 for traceability)
 (for further details on this option, please consult section 9.5 of the Feasibility Study)

| | Appropriate | Somewhat appropriate | Neutral | Somewhat inappropriate | Inappropriate | No opinion |
|---|----------------------------------|-----------------------|-----------------------|------------------------|-----------------------|-----------------------|
| *Technical feasibility | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *Interoperability | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *Ease of operation for users | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *System integrity (e.g. low risk of manipulation) | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *Potential of reducing illicit trade | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *Administrative/financial burden for economic operators | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *Administrative/financial burden for public authorities | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

B.2.5. Please upload any additional comments on the options referred to in question B.2 (max. 5 pages)

- **57fc5d46-38d1-44a8-9014-001a882fdd29/Authentix was requested by UK HMRC to input to EU consultation.docx**

C. Cost-benefit analysis

C.1. Do you agree with?

| | Agree | Somewhat agree | Neither agree nor disagree | Somewhat disagree | Disagree | No opinion |
|--|-----------------------|-----------------------|----------------------------|----------------------------------|-----------------------|-----------------------|
| *The benefit analysis presented in section 11.3.1 of the Feasibility Study | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| *The cost analysis presented in section 11.3.2 of the Feasibility Study | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

*C.1.1. If you selected option "Disagree" or "Somewhat disagree" in the previous question, please upload your main reasons for disagreement (max. 5 pages)

• 5c8dc320-6c24-41be-8100-5763e6bb2e21/Authentix was requested by UK HMRC to input to EU consultation.docx

D. Additional questions

The questions in this section relate to different possible building blocks and modalities of the envisaged system (questions D.1, D.3, D.4, D.6, D.8, D.10, D.12, D.14 and D.16). When replying please take into account the overall appropriateness of individual solutions in terms of the criteria of technical feasibility, interoperability, ease of operation, system integrity, potential of reducing illicit trade, administrative/financial burden for economic stakeholders and administrative/financial burden for public authorities.

*D.1. Regarding the generation of a serialized unique identifier (for definition of a unique identifier, see Glossary in the Feasibility Study), which of the following solutions do you consider as appropriate (multiple answers possible)?

- a) A single standard provided by a relevant standardization body
- b) A public accreditation or similar system based on the minimum technical and interoperability requirements that allow for the parallel use of several standards;
- c) Another solution
- d) No opinion

D.2. Please upload any additional comments relating to the rules for generation of a serialized unique identifier referred to in question D.1. above (max. 2 pages)

*D.3. Regarding (a) data carrier(s) for a serialized unique identifier, which of the following solutions do you consider as appropriate (multiple answers possible)?

- a) Solution based on a single data carrier (e.g. 1D or 2D data carriers)
- b) Solution based on the minimum technical requirements that allow for the use of multiple data carriers;
- c) Another solution;
- d) No opinion

*D.4. Regarding (a) data carrier(s) for a serialized unique identifier, which of the following solutions do you consider as appropriate (multiple answers possible)?

- a) System only operating with machine readable codes;
- b) System operating both with machine and human readable codes;
- c) No opinion

D.5. Please upload any additional comments relating to the options for (a) data carrier(s) for a serialized unique identifier referred to in questions D.3 and D.4 above (max. 2 pages)











*D.6. Regarding the physical placement of a serialized unique identifier, when should it happen (multiple answers possible)?

- a) Before a pack/tin/pouch/item is folded/assembled and filled with products;
- b) After a pack/tin/pouch/item is folded/assembled and filled with products;
- c) No opinion

D.7. Please upload any additional comments relating to the placement of a serialized unique identifier referred to in question D.6. above (max. 2 pages)

D.8. Which entity should be responsible for?

| | Economic operator involved in the tobacco trade without specific supervision | Economic operator involved in the tobacco trade supervised by the third party auditor | Economic operator involved in the tobacco trade supervised by the authorities | Independent third party | No opinion |
|---|--|---|---|-------------------------|----------------------------------|
| *Generating serialized unique identifiers | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Marking products with serialized unique identifiers on the production line | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Verifying if products are properly marked on the production line | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Scanning products upon dispatch from manufacturer's/importer's warehouse | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| *Scanning products upon receipt at distributor's/wholesaler's premises | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| | | | | | |

| | | | | | |
|---|---|---|---|---|---|
| *Scanning products upon dispatch from distributor's/wholesaler's premises |  |  |  |  |  |
| *Aggregation of products |  |  |  |  |  |

D.9. In relation to question D.8. above, please specify any other measures that your organisation considers relevant

Text of 1 to 1200 characters will be accepted

*D.10. Regarding the method of putting the security feature on the pack/tin/pouch/item, which of the following solutions do you consider as appropriate (multiple answers possible)?

- a) A security feature is affixed;
- b) A security feature is affixed and integrated with the tax stamps or national identification marks;
- c) A security feature is printed;
- d) A security feature is put on the pack/tin/pouch/item through a different method;
- e) No opinion

D.11. Please upload any additional comments relating to the method of putting the security feature on the pack referred to in question D.10 above (max. 2 pages)

• **2bb92a51-0777-4d7b-a4bb-f4bfa37e3ef5/Authentix was requested by UK HMRC to input to EU consultation.docx**

*D.12. Regarding the independent data storage as envisaged in Article 15(8) of the TPD, which of the following solutions do you consider as appropriate (multiple answers possible)?

- a) A single centralised storage for all operators;
- b) An accreditation or similar system for multiple interoperable storages (e.g. organised per manufacturer or territory);
- c) Another solution
- d) No opinion

D.13. Please upload any additional comments relating to the independent data storage referred to in question D.12. above (max. 2 pages)

*D.14. In your opinion which entity(ies) is/are well placed to develop reporting and query tools (multiple answers possible)?

- a) Provider of solutions to collect the data from the manufacturing and distribution chain;
- b) Provider of data storage services;
- c) Another entity
- d) No opinion

D.15. Please upload any additional comments relating to the development of reporting and query tools referred to in question D.14. above (max. 2 pages)

*D.16. Do you consider that the overall integrity of a system for tracking and tracing would be improved if individual consumers were empowered to decode and verify a serialized unique identifier with mobile devices (e.g. smartphones)?

- a) Yes
- b) No
- c) No opinion

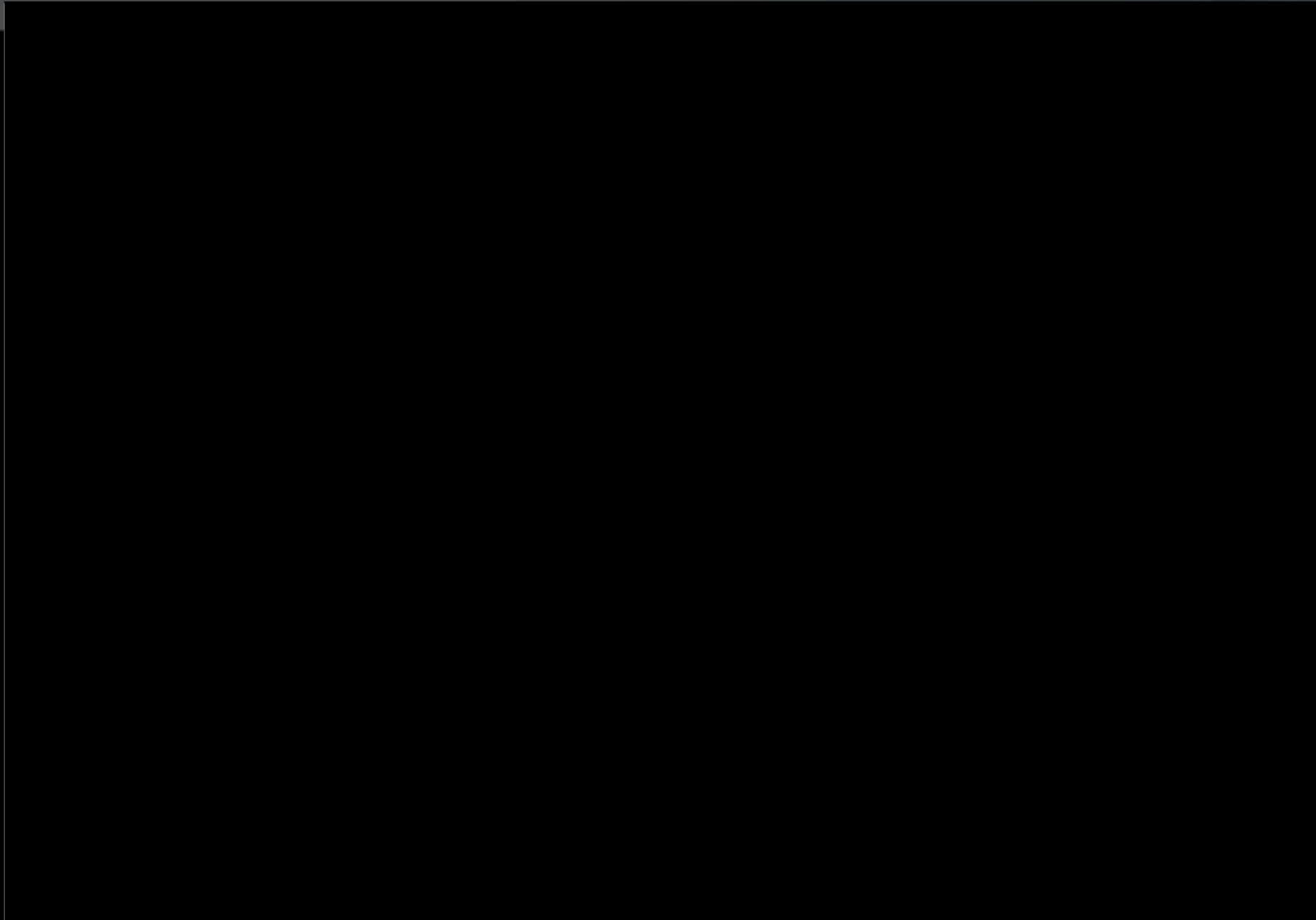
D.17. Please upload any additional comments on the subject of this consultation (max. 10 pages)

Contact

✉ SANTE-D4-SOHO-and-TOBACCO-CONTROL@ec.europa.eu

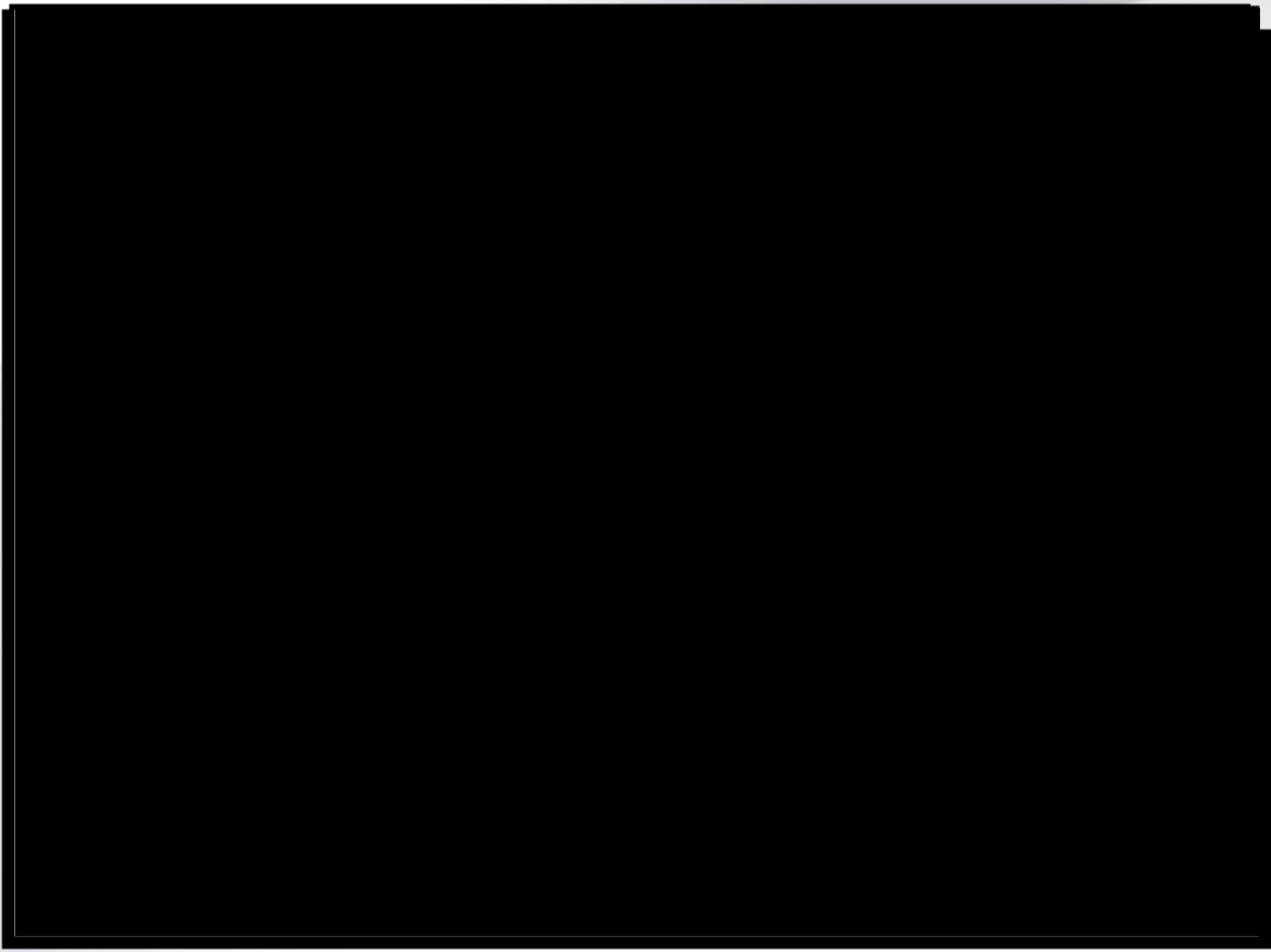
Attachment A4

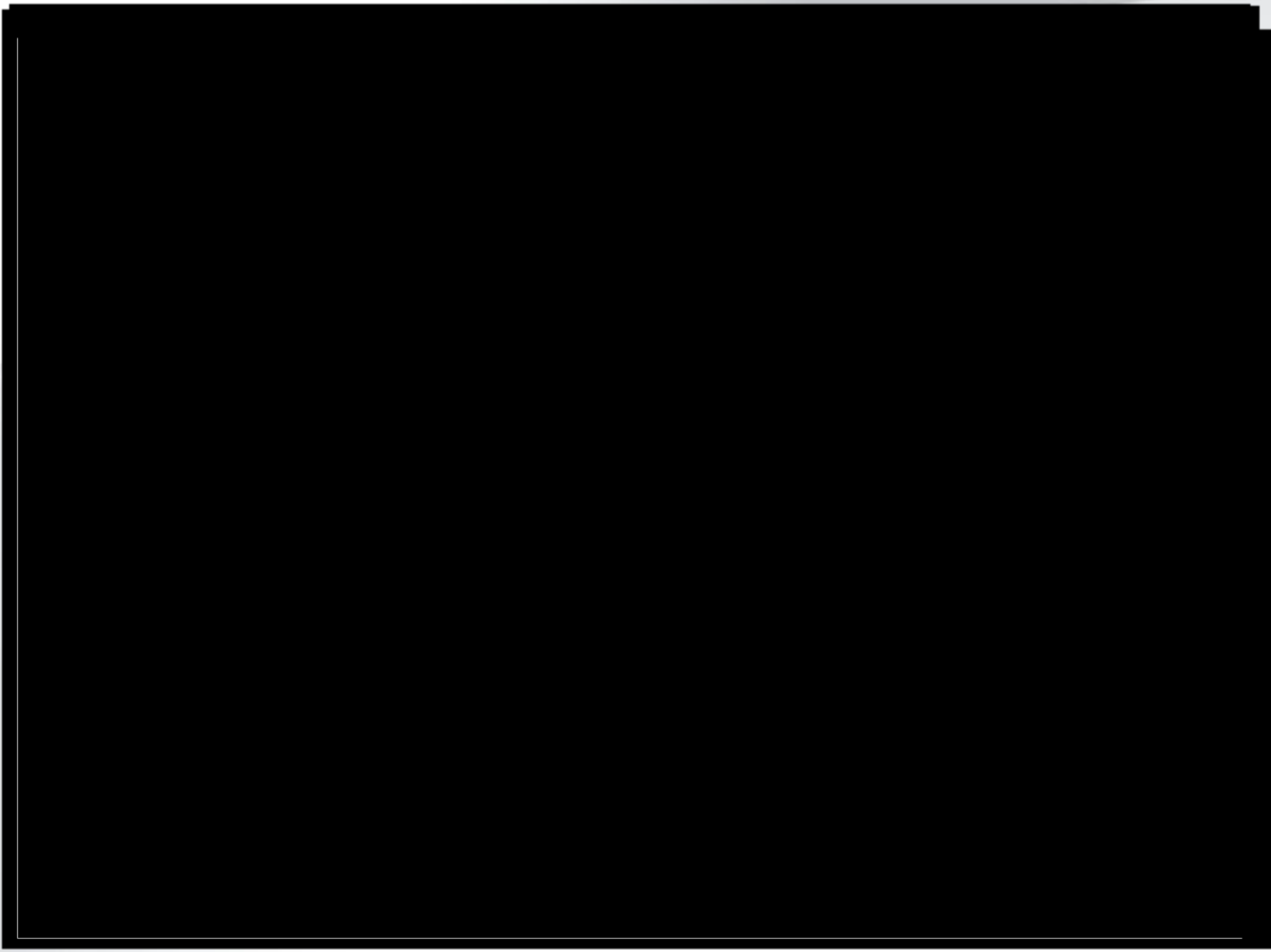


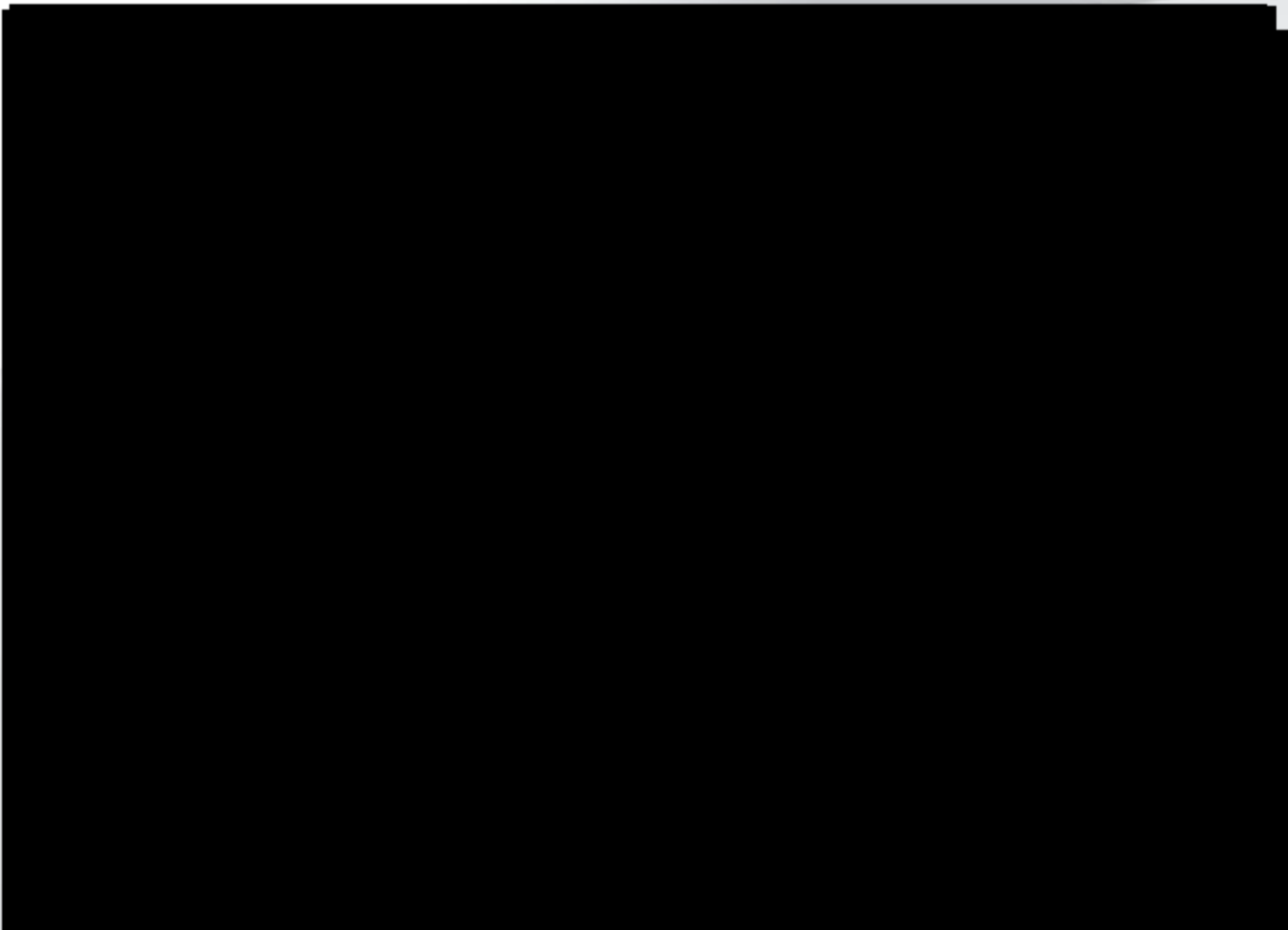




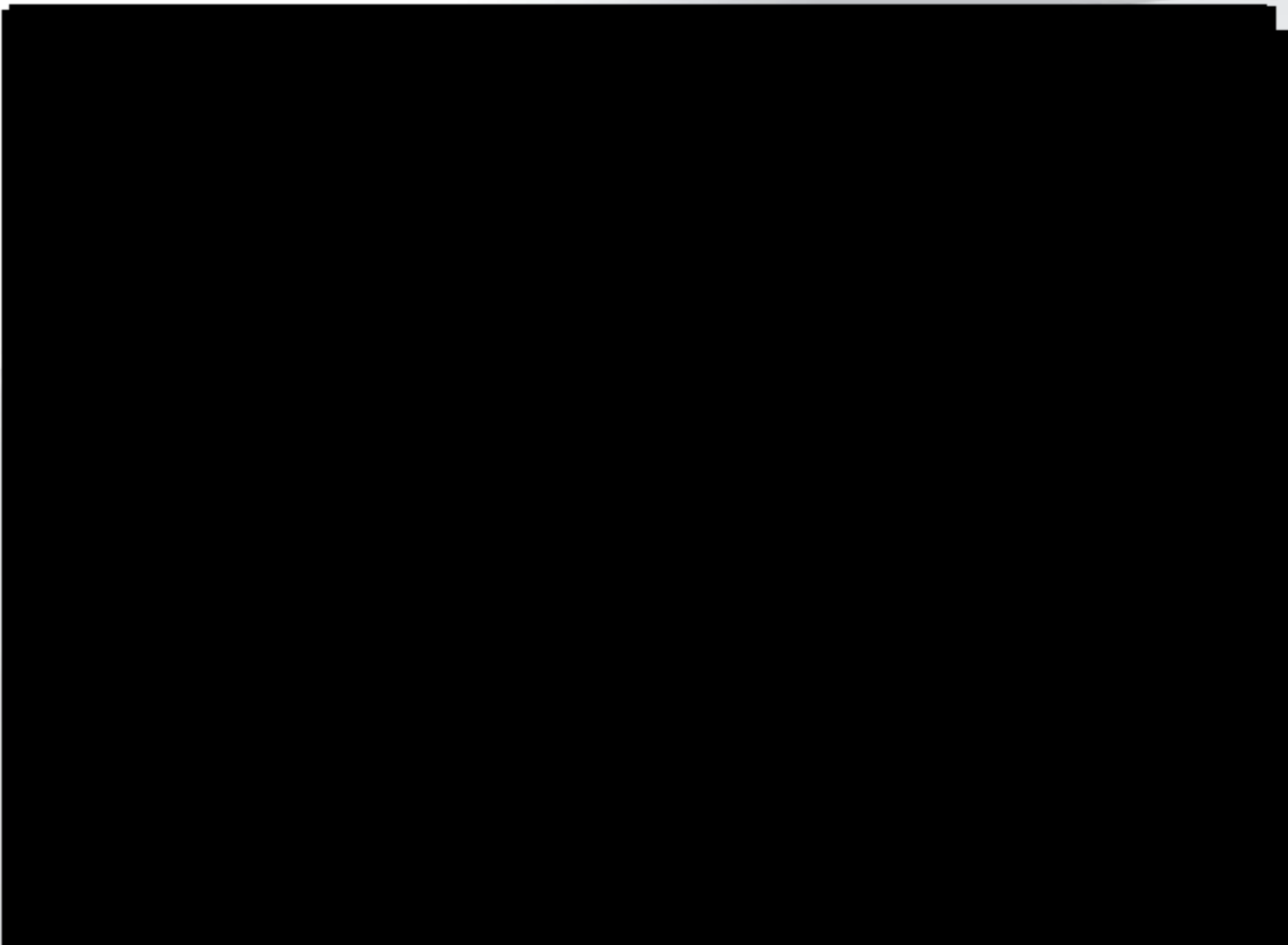


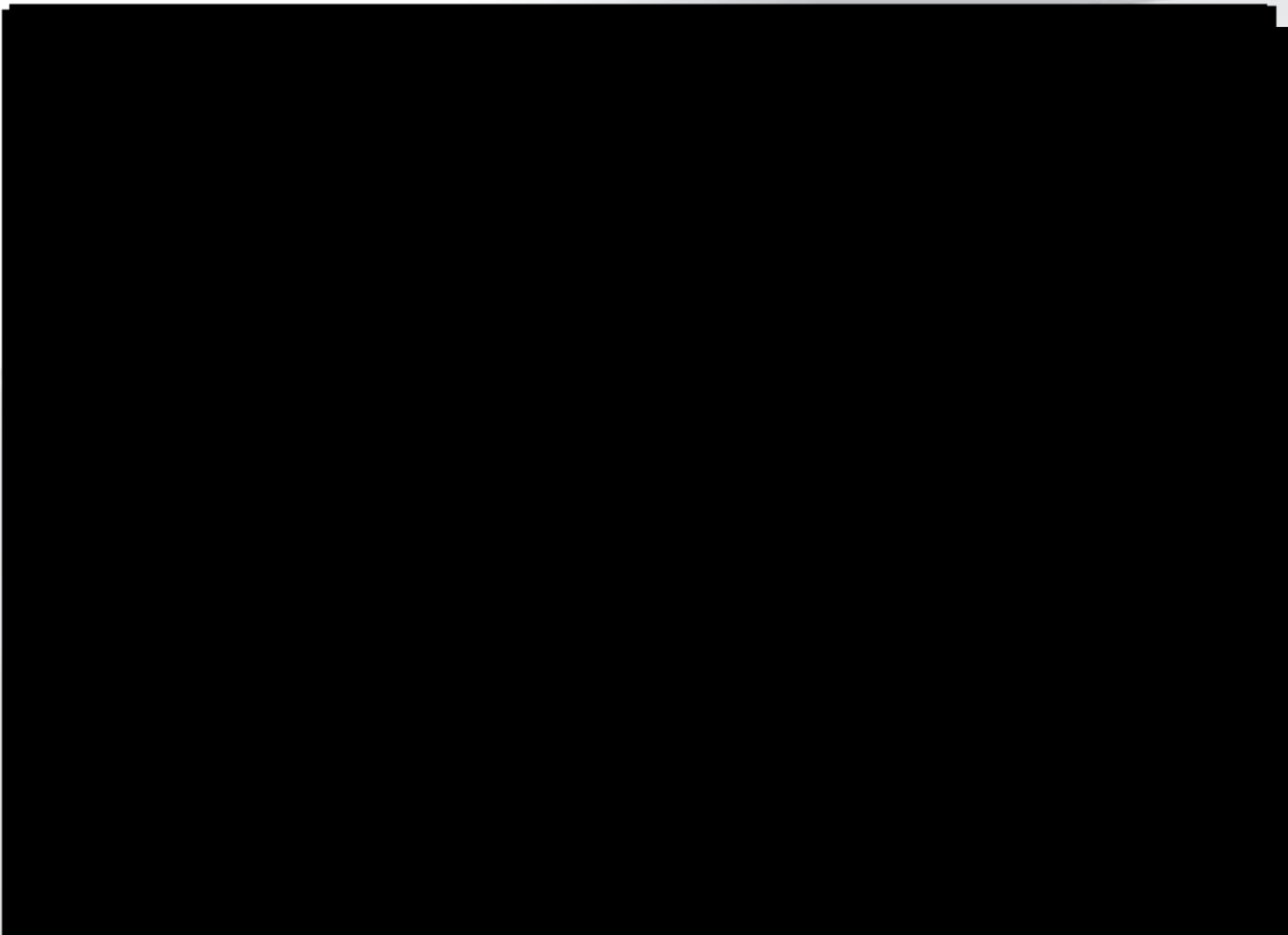


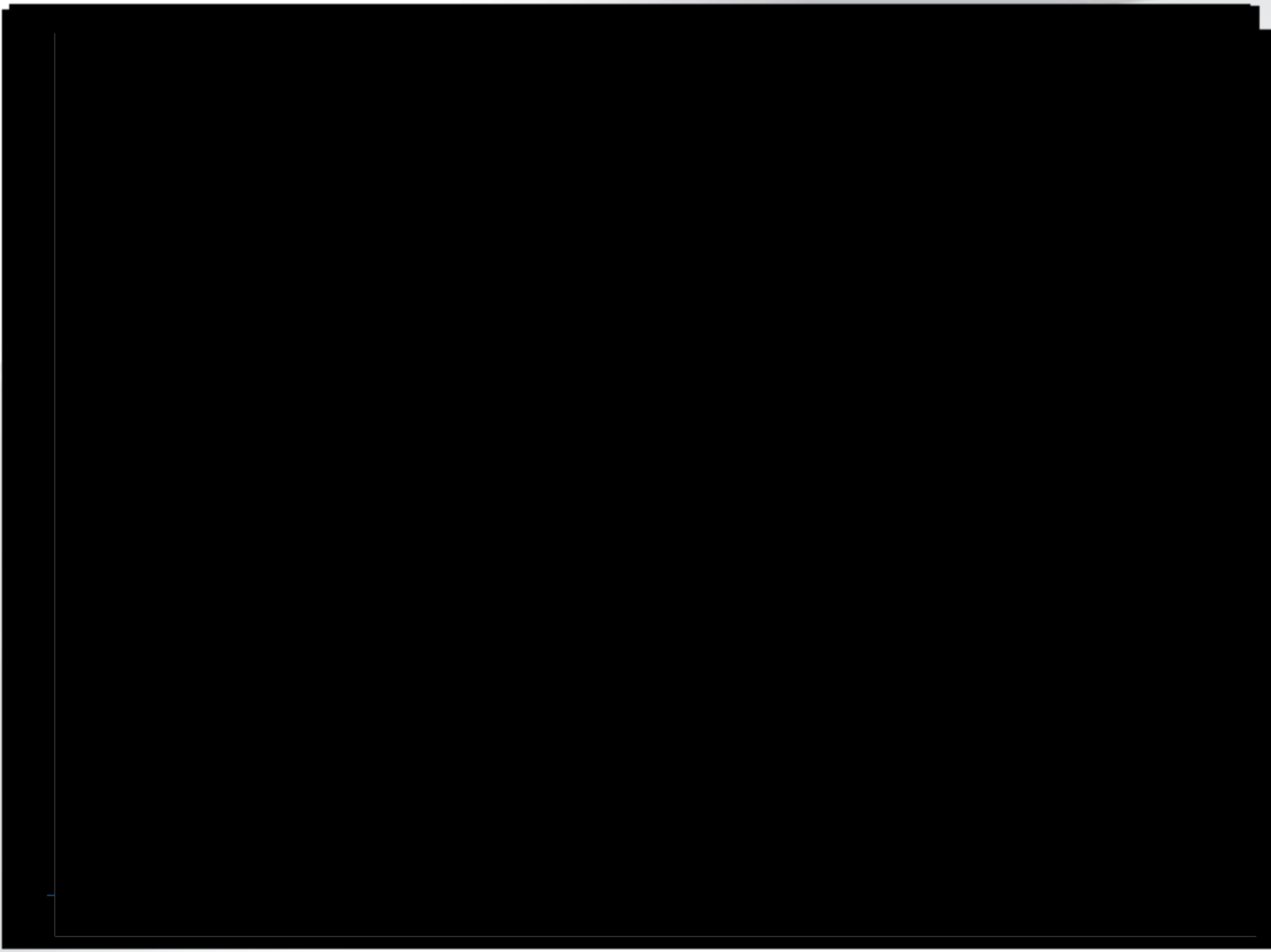


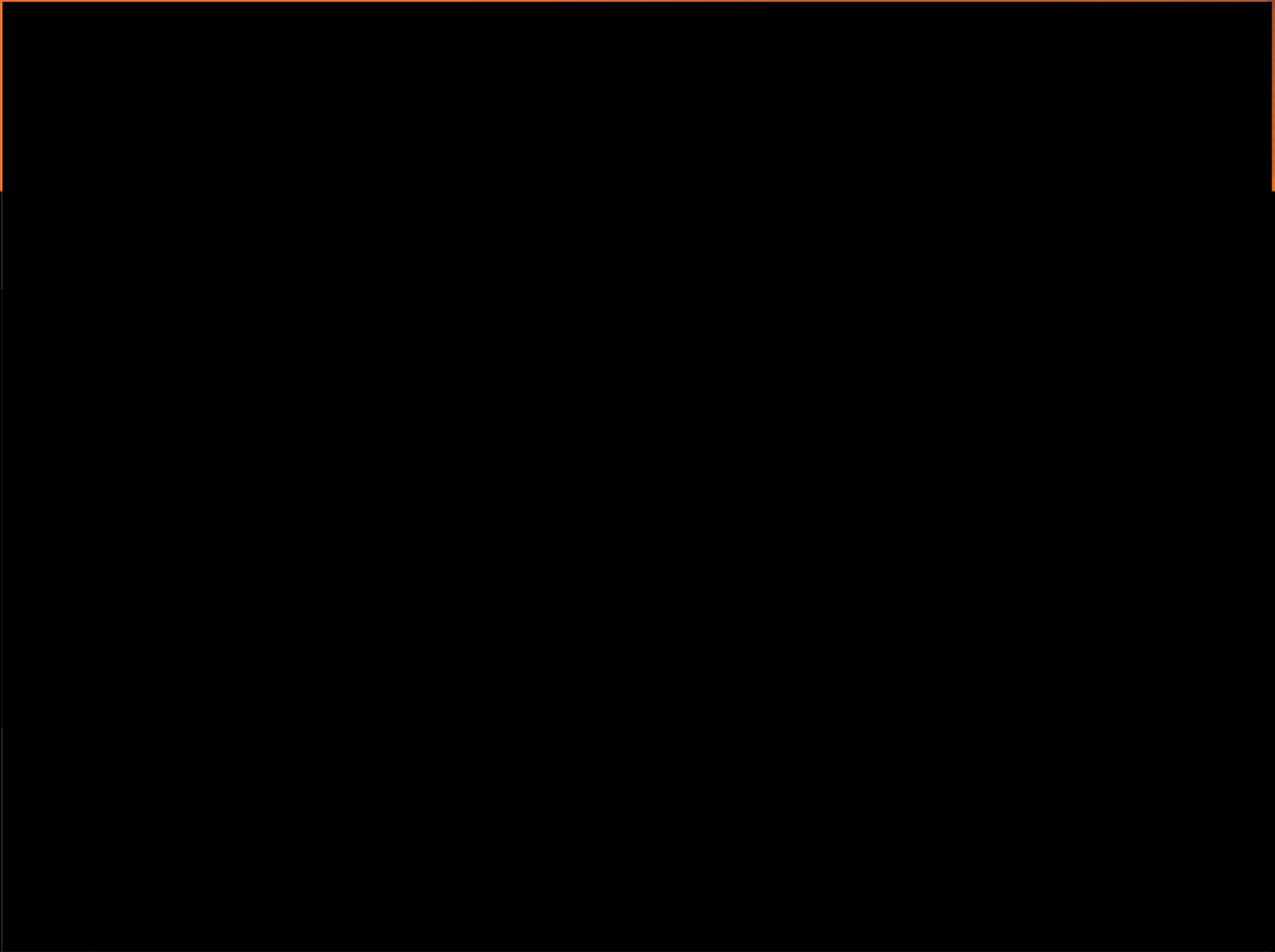












Attachment B.2.5

Authentix was requested by UK HMRC to input to EU TPD2 consultation:

We believe a harmonisation and upgrade to the current covert authentication products used in tobacco will demonstrate high security authentication in plain packaging, improved communications, better real time knowledge of authentication activity & economies of scale for the EU & all 28 states.

This can be achieved through standardisation of the taggant based covert mark across all carriers (tear tape, tax stamp or carton) & converters (printers, tear tape manufactures etc) and an implementation of the next generation of Bluetooth & multi-taggant signal reader + App, Map & Statistics based solution.

For the “next step” in an efficient & effective, covert taggant based authentication security feature we would recommend:

Authentix “Next Step”:

- **Authentix back ground** – Authentix are a global, leading edge manufacture of carrier (label, seal, tax stamp, carton to tape etc) & converter (printer, tear tape manufacture etc) independent, impenetrable, covert, and invisible, infra-red taggant/reader based solutions. Authentix supplies solutions to some of world’s largest brand owners & governments. We are renowned for a first class and global technical support infrastructure. For North & South America our offices are in Dallas, Texas and for EMEA this is based out of York UK.

The suggested Authentix “Next Step” solution:

- **One EU Covert Standard** – Authentix HVX3000 covert taggant solution on all carriers via all converters. A trusted, impregnable authentication technology.
- **Authentix HVX BlueTooth 3000 Readers** – EU & the 28 States enforcers (trading standards etc) can read & authenticate all brands regardless whether via tear tape, tax stamp or carton
- **Authentix “Real Time” App** – EU & all 28 States will be able to see authentication activity by volume, genuine & fake reads, by brand, location & person reading all reported in real time via a trusted impenetrable technology
- **Brand Owners Signals** – Each can have distinct signals only viewable by the brand owner but viewable to all EU & 28 States authorities under the “one EU standard” program
- **EU signal** – Where a specific brand owner signal is not needed there will be an EU standard with additional brand pack identity input via the App
- **Genuine/Fail** – Genuine products will read as green & fake products red. The fake product will need the brand type input via the App
- **Future Proofed** – New Authentix three dimensional, bi-exponential application via the same reader expand the available signals and is backward compatible. Unique future security
- **Current State Process’s & Increased Choice** – Limited disruption to current process’s (tear tape or tax stamps etc) but gives the States choice of carrier/converter

I hope the Authentix “Next Step” solution helps in creating a path forward for TPD2 whilst maintaining the best of the current process and adding efficiency, effectiveness & choice.

██████████
Brand Protection Director – EU, Authentix

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Attachment C.1.1

Authentix was requested by UK HMRC to input to EU consultation:

I believe an upgrade to the current HMRC system will show a better return to governments & brand owners than the tax stamp philosophy promoted by the attached report. The main reason for this is the reduced disruption to brand owners production processes versus a tax stamp applicator. The application of verifiable tamper evident (tear tape), serialisation (code jetted onto the pack) and covert security (on tape & pack) features are already established and separated, make it more challenging for a counterfeiter versus one combined tax stamp.

For an upgraded, efficient & effective, covert authentication security feature we would recommend:

Authentix:

- **Authentix back ground** – Authentix are a global, leading edge manufacture of carrier (label, carton to tape etc) & converter (printer, tear tape manufacture etc) independent, covert, invisible, infra-red taggant/reader based solutions. Authentix supplies solutions to some of world's largest brand owners & governments (re oil & gas excise authentication). We are renowned for a first class and global technical support infrastructure. For Europe this is based out of York UK.

The suggested solution:

- **On carton 1*1cm mark via print** – Non removable but easily accessible by authorities on pack or in baggies for post sales litter picking. Unlike tear tape & overwrap film that appear to be considered in TPD as not being part of the pack
- **On tape invisible taggant mark (for sticks) & label (for RYO/MYO) via print at 50% of current level** – To allow verification of tear tape (sticks) / label (RYO) if these are considered tamper evident features
- **Efficient** – Combined costs of “on carton” & “on tape” mark will be the same as the on tape only current system creating better value for money whilst meeting the needs of the EU TPD
- **Each Manufacture has a “Distinct Signal” but authorities can read all** – Distinct but open to authorities. We could go further with the soon to be launched Authentix bi-exponential taggant system. This effectively extends the available invisible IR taggant signals. This would allow a potential link to batch codes
- **Latest Design Scanning Reader** (attached) – Distance read for flexibility i.e. baggies versus in contact read which is restrictive. Modern fob based design for ease of use. LED's on top & rear for clear Y/N identification. Vibrate for discrete authentication. USB recharging
- **Blue Tooth Enabled Reader** – Link authentication to smartphone app/gps etc information and/or to serialisation App when reading
- **Future Proofed** – New Authentix three dimensional, bi-exponential application via the same reader as mono-exponential signal. So backward compatible. Unique future security
- **Manufacturing productivity** – No disruption to brand owners manufacturing lines

I hope this helps in creating a path forward efficient/effective solution whilst maintaining the best of the current process. This to counter the tax stamp alternative that is being promoted for the convenience of a technology supplier.

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