



# **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.**

- If a wholesale vendor installs and owns 100 vending machines (self-service) in pubs which he services, does he have to scan the product leaving his warehouse into each individual machine in the pub or can he class the 100 vending machines and his business/warehouse as 'the retail outlet' and only the manufacturer who supplies him has to scan into his business/warehouse?
- If a Cash & Carry/ Warehouse breaks down master cases and creates a new 'mixed packaging' of various products from different manufacturers, a new UI has to be applied to this "mixed package". Does this new UI need to reflect the UI of all manufacturers and all cartons in the 'mixed pack'? What if the UI is over 100 characters?
- How shall batches be captured that will not be recorded as outgoing goods via the given system? For example in the case of sale to consumers

- Some customers in Cash-and Carry- wholesale markets are not resellers (first retail outlets) but industrial or commercial end consumers (e.g. craftsmen, employees or owners of restaurants). This category of customers purchases tobacco products with the sole intent of own-consumption; How does the market deal with this type of customers, as consumers of TP don't require an Ui code according to art.14?
- Regarding the delays in the calendar at the EU scale, and regarding the lack of texts yet in each member state, it will be impossible for SMEs to implement the T&T system in due time. Could SMEs have an additional 1 year implementation period?
- For small SMEs, manufacturing less than 120 million of packs per year, it is too complicated and too expensive to implement Track and Trace if each member state decides of it's own UI issuer/UI code. Could SMEs use a simplified system in which the relevant UI issuer/UI code are those from the manufacturing country?

- Does the Commission consider making adjustments of the implementation regulation for SMEs distributing cigarettes and RYO, as SMEs and micro businesses distributing other tobacco products only have to implement it until the 20<sup>th</sup> of May 2024?
- How will the Commission ensure that the fees charged by the UI issuer will be fair, reasonable, and maintained at an absolute minimum?
- What will the European Commission do to ensure that European manufacturers can still export their products, though they will be marked with the UI codes?



**THANK YOU  
FOR YOUR ATTENTION**