

Dr Filip Borkowski  
Deputy Head of Unit B2 – Cross-border Healthcare and Tobacco Control  
Directorate General for Health and Food Safety  
Rue Breydel 4  
1040 Brussels

Brussels, 9 April 2019

**Re: Request for clarification regarding Article 15 of the Tobacco Products Directive**

Dear Dr Borkowski,

The CECCM member companies and Philip Morris International are fully committed to complying with the provisions of Article 15 of Directive 2014/40/EU by 20 May 2019.

As the Commission's information note to the Working Party on Public Health<sup>1</sup> sets out, the 20 May 2019 deadline for the traceability system to become fully operational may not be attainable for one or multiple ID issuers. The information note also states that in such a scenario, there is "a high chance that this results in disruptions of the intra-EU trade as well as the extra-EU trade".

We take note that there is a meeting of the Subgroup on Traceability and Security Features on 12 April, during which the member state experts will discuss this topic.

We would appreciate, at this time, any clarification or guidance from the Commission as to how the industry can ensure the smooth running of the tobacco supply chain should the situation arise that an ID issuer is not in a position to register economic operators in time for the traceability system to become operational on 20<sup>th</sup> May and deliver the unique identifiers as mandated by Directive 2014/40.

We hope to hear from you soon given the pressing nature of the issues concerned.

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<sup>1</sup> Politico, *Commission: Tobacco track-and-trace system at risk of delay* (1 April 2019), available at [https://www.politico.eu/pro/commission-tobacco-track-and-trace-system-at-risk-of-delay/?utm\\_source=POLITICO.EU&utm\\_campaign=6656702d97-EMAIL\\_CAMPAIGN\\_2019\\_04\\_01\\_01\\_07&utm\\_medium=email&utm\\_term=0\\_10959edeb5-6656702d97-190069097](https://www.politico.eu/pro/commission-tobacco-track-and-trace-system-at-risk-of-delay/?utm_source=POLITICO.EU&utm_campaign=6656702d97-EMAIL_CAMPAIGN_2019_04_01_01_07&utm_medium=email&utm_term=0_10959edeb5-6656702d97-190069097)

Yours sincerely,

Alisdair Gray  
Secretary General  
CECCM



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