



Ms Anna Bobo-Remijn  
Unit B.3  
DG Environment  
European Commission

26 May 2020

**Single Use Plastics & EPR: Delivering a Practical and Effective Solution  
for Tobacco Products**

Dear Ms Bobo-Remijn

The Industry Working Group made up of the members of Tobacco Europe (Japan Tobacco International, Imperial Brands and British American Tobacco) and Philip Morris International, were grateful to have the opportunity to meet with DG Environment on 20 February to discuss some of the main elements associated with Article 8 of the SUP Directive and the work we have commissioned from Eunomia in relation to EPR for tobacco product filters.

Eunomia has now completed a set of "Proposals for Development of Article 8(4) Guidelines on Criteria for Costs of Cleaning up Litter" which we are forwarding for DG Environment's consideration. As you will see, the Eunomia Proposals set out a step wise approach to developing EPR schemes. We hope the Commission will find this work useful in drafting EPR Guidelines in consultation with Member States, on the costs of cleaning up litter, set out in the Directive.

The Proposals' starting point is to determine what services are necessary to deliver EPR, moving through to the creation of a standard for cleanliness, the delineation of necessary costs, and how this should be underpinned by cost-efficiency, transparency and a proportionate method for calculating costs. The Proposals conclude with some suggestions as to how best to frame the use of multiannual fixed amounts to fund EPR schemes.

Should there be any aspects of our Proposals where further detail would be of use to the Commission, we would of course be delighted to follow up with you directly.

On a separate issue, our sector fully understands the challenges the EU Institutions face in continuing ongoing business. Our aim is, above all, to play a constructive role and provide any useful feedback when needed. With this in mind, on the specific issue of marking requirements under Article 7, our understanding is that adoption of the relevant Implementing Act is now foreseen for November 2020.

This delay would be problematic as the lead time to change packaging designs requires approximately 12 months from the time when technical specifications become available for the compliance date for products placed on the market on 3 July 2021.

We fear that the delayed adoption of the Implementing Act will limit our ability to change packaging designs for the new marking requirements in due time. This will inevitably result in finished goods and already produced packaging materials becoming obsolete, generating significant packaging material waste.

Given this challenge, it would be helpful if the Commission was able to consider a delay to the deadline from 3 July 2021 to 1 January 2022. This would allow for, in each Member State, the

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implementation of the new marking together with the annual rotation of the Combined Health Warning (prescribed by the Tobacco Products Directive) that will happen from May 2021 to January 2022.

We hope it is possible to consider this request, and we stand ready to explore this with you in more detail at your earliest convenience.

Yours sincerely

Alisdair Gray  
Tobacco Europe