



Industry Working Group on Plastic

Position on SUP Product Marking for Unit Packaging of Cigarettes and other Tobacco Products with Filters

Background

The following position represents the views of the members of the Industry Working Group on Plastic, comprising the four leading producers of tobacco products in Europe.

Our intention is to provide a constructive solution to any practical challenges that may arise in applying product marking requirements as set out by Article 7 of the Directive on Single Use Plastics. The industry is supportive of the need to raise consumer awareness about the negative impact of littering on the environment, including the use of on-pack marking.

Our position is that any marking needs to be applied in a technically feasible and proportionate manner in order to achieve its desired effect, and crucially, any symbols or statements should be located in a separate area to the pictorial health warnings.

Aligning Annual Rotation of the Combined Health Warning

Given the labelling and packaging obligations set out by Chapter II of the Tobacco Products Directive, our concern is that delaying adoption of the Implementing Act to November 2020 will limit our ability to change packaging designs for the new marking requirements. Without sufficient lead times, this will inevitably result in finished goods and already produced packaging materials becoming obsolete, generating significant packaging material waste.

Our proposed solution would be to align the annual rotation of the combined health warnings with the printing process. If the Commission delayed the implementation deadline of 3 July 2021 to 1 January 2022 this would allow for a more realistic transition period for producers and the supply chain to work towards.

Minimum Sizes for Markings

Our understanding is that the Commission will propose minimum sizes for markings, irrespective of their placement, which could raise challenges for some pack formats. For packaging formats where the available surface would not allow to apply the minimum size of the respective product marking on the foreseen unit packs' surface, manufacturers should be given the flexibility to apply the marking on another available surface of the outside of the unit pack, as long as the readability for consumers is ensured. Readability can be ensured by stipulating a minimum font size and font type.

Our concern is that it could be disproportionate and anti-competitive if the marking rules led to a situation by which existing pack formats would become obsolete if they did not comply with the specifications set out in the Implementing Act.

In addition, alternative placement should not be ruled out simply because the consumer testing work being carried out by the Commission had indicated certain results for the front and / or back of pack.

Lateral Placement

Placing product marking on the lateral side of the cigarette pack would not have any impact on the presence of tax stamps (where used).