Dear [Name],

I would like to thank you for sharing your concerns with us.

Indeed the amendment for an optional provision was proposed by Member states during the discussion in the Council and could be seen to be in line with the provision of energy directive. We are aware of the fact that the arrangements for alcohol and tobacco products are not the same and we underlined that the measure might be impractical, especially for tobacco products, and that Member States are already applying antiforestalling measures.

As you know the decision lies now in the hands of Member States. I would suggest you contacting the Romanian Presidency for more information.

Best regards,

[Name]

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From: [Name] @ec.europa.eu  
Sent: Monday, May 6, 2019 12:04 PM  
To: [Name] @ec.europa.eu  
Cc: [Name] @ec.europa.eu; [Name]  
Subject: RE: CECCM letter on proposed amendment to Article 8 (Recast 2008/118/EC)

Yes it’s the same thing. If you want to say something beyond that, maybe say that it’s an optional provision.
Ahead of tomorrow’s High Level Working Party on Tax Questions (7 May), the Confederation of European Cigarette Manufacturers - CECCM - would like to draw your attention to the proposed amendment introduced to Article 8 (Article 9 in the current Directive) of the Proposal for a Council Directive laying down the general arrangements for excise duty (Recast) reading as follows: “When excise duty rates are changed, stocks of excise goods already released for consumption may be subject, where appropriate, to an increase in, or a reduction of, the excise duty.”

You will find attached CECCM’s particular concerns and views about why this new proposed amendment is problematic.

We thank you in advance for the attention given to our concerns and remain at your disposal should you need further information.

Best regards,

Rue Montoyer,10 | 1000 Brussels | Belgium
T +32 2 | M +32
https://www.ceccm.eu/

EU Transparency Register: 1496873833-97

Confederation of European Community Cigarette Manufacturers (CECCM) AISBL, registered number 0879 438919 ceccm@ceccm.eu

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