



[REDACTED]
Unit B2 – Team Track & Trace
Unit B2 – Cross-border healthcare and tobacco control
Directorate-General for Health and Food Safety
European Commission
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May 27, 2019

**Re: Traceability system for tobacco products
Commission Implementing Regulation (EU) 2018/574 and Commission Decision (EU) 2019/691;
“Temporary absence” of competent ID issuers**

Dear [REDACTED]

We refer to the Commission Decision (EU) 2019/691 which allows manufacturers to request unique identifiers from issuers approved in a different Member State if there is a temporary absence of ID issuer in the Member State for which we require codes.

We wish to inform you that we are using this facility for several Member States where, despite the ID issuer being appointed, the system is still not operational. The reasons for this are as follows:

- Some Member States appointed their ID issuer at the last minute just before the 6 May 2019 deadline. As this date was unrealistically close to the 20 May 2019 introduction of the traceability system, the technical interfaces necessary for the systems to go live are still being developed.
- We have previously indicated to both the Commission and Member State authorities that we need at least 4 weeks from the date the appointed competent ID issuers are ready to provide codes, to the date we can go live. We are still within this timeframe for many ID issuers and our technicians are working flat out to put in place all measures necessary to secure the smooth operation of the system.
- Had we not done this, it would not only have adversely affected our business, but it would have also adversely affected the smooth functioning of the internal market. Further, the objectives of the traceability system, including the elimination of illicit trade in tobacco products, would have been compromised.

This state of affairs is temporary and understood by the Member States. It is inevitable that we experience some hiccups in a highly complex technical implementation for the traceability of tobacco products throughout the EU.

Please rest assured that we are confident that all these issues will be resolved in the [REDACTED]

Yours sincerely,

[REDACTED]
[REDACTED]
[REDACTED] Corporate Development, Western Europe

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