

The following table sets out the main responsibilities of manufacturers and importers under the traceability system. Please note, however, that it is not exhaustive and [Implementing Regulation \(EU\) 2018/574 \(IR\)](#) and its accompanying annexes, as well as [Delegated Regulation, \(EU\) 2018/573](#) should be consulted for further details.

Manufacturers and importers of tobacco products responsibility
<p><u>Identifier codes</u></p> <ul style="list-style-type: none"> <li>- Request an economic operator identifier code (Art. 14 IR)</li> <li>- Request a facility identifier code (Art. 16 IR)</li> <li>- Request a machine identifier code (Art. 18 IR)</li> </ul> <p><u>Unique Identifier (UI)</u></p> <p><i>For unit level UIs:</i></p> <ul style="list-style-type: none"> <li>- Request unit level UIs from ID issuer (Art. 9 IR)</li> <li>- Mark unit packets with UIs (Art. 6 IR); add a timestamp (Art. 8.3 IR)</li> <li>- Verification of unit level UIs (Art. 7 IR)</li> </ul> <p><i>For aggregated level UIs:</i></p> <ul style="list-style-type: none"> <li>- Decision to request UIs from ID issuer or self-generate directly in accordance with relevant ISO standards (Art. 10 IR)</li> <li>- If requesting from ID issuer: introduce request (Art. 13 IR).</li> <li>- If generating directly: generate UIs in accordance with relevant ISO standards (Art. 10 IR).</li> <li>- Marking of aggregated packets with UIs (Art. 10 IR); for UIs issued by ID issuers: adding a timestamp (Art. 11.3 IR)</li> </ul> <p><u>Data carriers</u></p> <ul style="list-style-type: none"> <li>- Encoding of (electronically delivered) unit level UIs and aggregated level UIs (Art. 21 IR)</li> <li>- Ensure quality of optical barcodes (Art. 22 IR)</li> <li>- Inclusion of human-readable code into each data carrier (Art. 23 IR)</li> </ul> <p><u>Repositories system</u></p> <ul style="list-style-type: none"> <li>- Establishment of a primary repository (Arts. 24 &amp; 26 IR)</li> <li>- Notify the Commission regarding the identity of the proposed repository provider together with all relevant documentation, including the draft contract (Annex 1, Part A.1 and 2 IR)</li> <li>- Payment of all costs related to the repositories system via the costs charged by the providers of the primary repository (Art. 30 IR)</li> </ul> <p><u>Recording and transmitting of information</u></p> <ul style="list-style-type: none"> <li>- Recording and transmission of information on product movements to the primary repository (Art. 32 IA) within the permitted time frames (Art. 34 IR)</li> <li>- Recording and transmission of transactional information to the primary repository (Art. 33 IR) within the permitted time frames (Art. 34 IR)</li> </ul> <p>Provide equipment</p> <ul style="list-style-type: none"> <li>- Manufacturers are obliged to provide to EOs with the equipment that is necessary for the recording of the tobacco products purchased, sold, stored, transported or otherwise handled.</li> </ul>

That equipment shall be able to read and transmit the recorded data electronically to the repositories system (Art. 15(7) TPD)