
From: Crijnen, Marcel [M.Crijnen@sigaar.nl]
Sent: lundi 16 mai 2011 13:24
To: MORRIS Alick James (EMPL)
Subject: RE: European Cigar Manufacturers Association
Attachments: ECMA response to TPD consultation 141210.pdf; ECMA views on RAND report 191010.pdf

Dear Mr Morris,

Many thanks for your e-mail last Friday and for our telephone conversation earlier today.

As agreed I herewith send you a copy of our response to the public consultation on the possible revision of the tobacco products directive, as well as our views on the RAND report "Assessing the impacts of revising the tobacco products directive".

ECMA, the European Cigar Manufacturers Association, represents 20 cigar companies with 24 factories in the EU, employing some 6.000 persons (production, sales and management) in the EU. ECMA members together account for over 90% of the cigars produced in the European Union. Cigar manufacturing is characteristically small scale and craft based, consisting of many small to medium sized businesses. Cigars are being produced and sold in a wide array of models, sizes, brands, types of packaging and prices. The variety of products means that cigars are generally produced in small production runs. With an annual consumption of approximately 6.3 billion pieces, cigar consumption represents barely 0,8% of the total consumption of tobacco products in the European Union.

Summarising the consequences of possible labelling and packaging changes in the tobacco products directive, RAND concluded: "While cigar manufacturers would face lower administrative burden than cigarette manufacturers, for each measure the burden of complying with regulation would fall more heavily on them. The reason is that cigar manufacturers are much smaller enterprises and each of their products (i.e. SKUs) is typically of smaller quantity". As regards the current ingredients reporting requirements, table 5.3 of the RAND report shows that the ongoing administrative burden (in euro cents per piece) from the current reporting requirements is 30 to 100 times higher for cigar manufacturers compared to cigarette manufacturers.

In our view the foregoing implies that a "one size fits all approach" for all tobacco products does not work, as it - already - creates a disproportionate burden for the cigar industry. We fear that the revision of the tobacco products directive would lead to an even higher administrative burden and loss of jobs in the cigar sector, unless a clear differentiation between the various tobacco products is being made.

As said over the phone, we would highly appreciate to be given the opportunity to present our views in more detail during a personal meeting with you or one of your colleagues.

With best regards,
Marcel Crijnen
Secretary General

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27/07/2011

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Verzonden: vrijdag 13 mei 2011 12:12
Aan: Crijnen, Marcel
CC: Costas.CONSTANTINO@ec.europa.eu; Antonis.Angelidis@ec.europa.eu
Onderwerp: RE: European Cigar Manufacturers Association

Dear Marcel Crijnen

Thank you for this information on the concerns of your organisation with regard to the work of DG SANCO on the possible revision of the Tobacco Products Directive. In DG EMPL we seek to work in a coordinated way with our colleagues in DG SANCO to ensure the coherence of EU policies on worker protection and public health. For this reason we follow in detail the work of DG SANCO in so far as it has a potential impact on workers health and safety, such as the Green Paper on a Smoke Free Europe and subsequent Recommendation.

We would be most willing to meet with you to discuss any concerns which are relevant to the protection of workers health and safety. For example our ongoing work on the consultation of the EU social partners on a possible initiative to protect workers health from risks arising from exposure to Environmental Tobacco Smoke at the workplace. However, it is my understanding that the Tobacco Products Directive does not appear to raise such issues. Nevertheless, if you feel that there are such issues perhaps you could let us know and we can then discuss them, perhaps initially by phone and later by a meeting in Luxembourg if this is considered necessary.

Regards

Alick Morris

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From: Crijnen, Marcel [mailto:M.Crijnen@sigaar.nl]
Sent: Thursday, May 12, 2011 5:09 PM
To: MORRIS Alick James (EMPL)
Subject: European Cigar Manufacturers Association

Dear Mr Morris,

As I could not reach you by phone earlier this afternoon, I herewith would like to draw your attention to the following.

As you may have seen I have received your name and e-mail address from your secretariat to whom ECMA, the European Cigar Manufacturers Association, was

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referred by the secretariat of Mr Richelle. ECMA had contact Mr Richelle earlier this week with the request to be given the opportunity to inform him about the consequences of the upcoming revision of the tobacco products directive for the cigar sector. As Mr Richelle suggested that we should contact your unit, we would very much appreciate to discuss our concerns with you during a personal meeting. Would you be so kind to let us know whether it would be possible to meet with you during one of the next few weeks?

Yours sincerely,

Marcel Crijnen
Secretary General

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