

Written evidence submitted by Tor Imports to the Tobacco and Vapes Public Bill Committee (TVB47).

Executive Summary

1. The proposed legislation makes no attempt to understand the Other Tobacco Products (OTP) supply chain and marketplace and employs a 'one hat fits all approach'. This **ignores widely available, credible analysis that OTPs such as cigars do not attract young legal-age smokers or act as 'gateway products' for consumers**. It ignores the fact that such products remain principally enjoyment products for occasional use, making up a declining component of the overall UK and EU smoking prevalence. It takes no account of the fact that OTP smokers are older consumers exercising an informed choice to smoke cigars or pipe tobacco occasionally.
2. The UK government has a **history of proportionality and differential regulation** concerning different tobacco product categories that recognise their fundamental differences in production, supply routes, distribution, volume, consumer demographic and retail sales. This is absent in the proposed Bill. Tor Imports believes the UK government should rethink and realign itself with previous good governance standards, offering exemptions for certain products where such exemptions would have little or no impact on the purpose and goal of proposed legislation.
3. **Proposed legislation should be based on sound and publicly available scientific and commercial evidence** that considers the differences between tobacco product categories and the impact of said legislation on businesses. This is particularly vital for smaller companies focusing on other tobacco products (OTPs), such as cigars and pipe tobacco, operating in a very different market from the mass-produced cigarette and RYO categories. This is not currently the case for the information used to justify a blanket ban within the Bill. Tor Imports would request a review of the Impact Assessment supporting this Bill and its lack of consideration for all OTP tobacco categories, such as cigars, pipe tobacco and nasal snuff.
4. The UK OTP market is predominately comprised of SMEs at the supply, distribution and retail levels, primarily due to the significant assets and specialised skill sets the OTP market requires. This reflects the niche nature and complexity of the supply chain for products such as cigars and pipe tobacco. The impact of this bill on these commercial entities will be significant and disproportional. With high specialisation and small scale, diversification is exceptionally challenging, and therefore, it is likely **that many current companies will not survive**. Tor Imports would ask that the bill's committee stage appropriately consider the effects on the economy and the broader community.
5. Additional regulation always has unintended consequences; **where legal companies can no longer trade profitability, the illicit trade fills the void, requiring evermore draconian state action around enforcement and punishment**. Australia is an example. Tighter regulations, including standardised packaging, have significantly increased illegal trade, with organised crime replacing legal suppliers and retailers. The Australian government has also had to fund specific enforcement teams to counteract organised crime with the attendant expenses of such actions. (See Appendix 3 for links to Australian reporting)

Introduction - Why it matters to Tor Imports Ltd

I am writing as the Owner and Managing Director of Tor Imports Ltd, which specialises in importing niche tobacco products (OTPs) such as handmade cigars and pipe tobacco.

Based in Central Devon, my company has operated in a rural economy since 1992 and now employs 18 people.

Tor is a family-owned company that imports niche products from primarily family-owned producers based in Central America and supplies family-owned businesses across the UK. We would never be considered Big Tobacco, nor is there any evidence that our products encourage young people to take up smoking.

To put into context, the Tor share of the £10 billion tobacco duty collected in 2023 is 0.02% (source: tobacco statistics commentary – January 2024)

Tor Import's customer base is not just a list of names but a community of other small, family-owned retailers and hospitality venues. These businesses, like ours, are not just economic entities but pillars of the local economy. Any disruption to our operations could have far-reaching consequences for the livelihoods of many in our community.

Tor Imports does not import or distribute cigarettes, roll-your-own tobacco, or cigars that are below 3 grams in weight. (As defined in The Tobacco and Related Products Regulations (2016)). We supply niche low-volume tobacco products that mature adults consume occasionally. Such products should not form any part of the Bill's scope.

The Bill is of grave concern to the future viability of our business and the network of customers we supply. We request that the committee consider the significant impact of Bill (121) on the continued viability of SME companies such as Tor Imports Ltd.

It is disheartening to see that the niche products we offer, which have their own unique market and consumer base, were not adequately considered in the initial or follow-up drafting of the proposed legislation or in the Impact Assessment (IA) published in March 2024 (see Appendix 2)

This lack of consideration feels unjust and disproportional and will have severe consequences for our business and the communities in which we are based.

This bill removes the freedom of certain adults to make decisions for themselves in the future. It risks creating differentiated adult citizenship based purely on date of birth. While Tor Imports acknowledges the health risks associated with smoking, we also believe that all mature adults should have the freedom and autonomy to make their own lifestyle choices.

1. What differentiates OTPs like Cigars and Pipe Tobacco from Cigarettes & Hand Rolled Tobacco?

1.1. They are niche, so niche in fact that the UK government cannot collect accurate, meaningful data as consumption levels are statistically insignificant within the overall UK tobacco market. Neither the DHSC nor the Office for National Statistics currently tracks the incidence of OTP use. In the recent DHSC (OHID) Consultation on mandating quit information messages inside tobacco packs, which closed on 10th October 2023, under 'Option 5: make it a legal requirement to include pack inserts in all tobacco products' the DHSC makes the following statement: -

“it has not been possible to estimate the costs & benefits associated with these more niche forms of tobacco due to limited data available on the prevalence & consumption of these products”.

1.2. Cigars and Pipe Tobaccos fundamentally differ from mass-market tobacco in demographics, consumer price, availability, storage, consumption habits, volumes and alternatives that offer consumers a switching option. (EU Eurobarometer 2023 data is used as no UK data is collected due to the small size of the UK OTP market) Examples include: -

- 82% of European cigars and pipe tobacco consumers are over the age of 35. (See Figure 1, Appendix 1)
- No consumption was recorded across the EU/UK for the demographic 15-24. (Special Eurobarometer 539). (See Figure 2, Appendix 1)
- The average UK consumption of cigars is low, with less than 2% of the adult UK population consuming them. Handmade cigar smokers reported smoking cigars 1.2 days out of 30 days. (See Figure 3, Appendix 1)
- Cigars and pipe tobacco are not attractive to young smokers, nor do they act as an entry product due to cost, with the average box of handmade cigars retailing at over £420 in comparison to a pack of cigarettes available from £12.00.
- Specialist retail outlets are few; most handmade cigars are only sold through the UK's 150 specialist tobacconists. These few outlets comprise over 70% of Tor Imports revenue (Internal data for 2023).
- Specialists are legally defined in the UK. They must make 50% of their turnover from OTPs, and they cannot diversify into other product lines like a Newsagent might by expanding into a new product category. Rapidly, such specialists would become starved of investment and ultimately cease to exist, progressively pushing sales online where enforcement of age regulations is more problematic.
- As well as how they are purchased, handmade products are different from any other tobacco products in terms of how they are stored. The storage of handmade cigars requires a strict humidity and temperature control of 70% relative humidity and a temperature of 18 degrees centigrade. These strict storage requirements require speciality distributors and retailers to sell handmade cigars. (See Table One)
- There are no apparent alternatives (such as vapes for cigarettes). Cigar and Pipe Tobacco smokers consume for pleasure, have no desire to quit and have no switching options available.
- Low-volume niche products such as cigars and pipe tobacco will not forward the government's stated policy aims nor represent a switching opportunity from mass-market products such as cigarettes if exempted from the rising age ban. As evidence of the potential for a low likelihood of consumer switching, we can look at those EU markets that imposed plain packaging on cigarettes and hand-rolled tobacco but exempted cigars and pipe tobacco based on good governance and proportionality (Including the UK). These markets have not seen a consumer switch towards cigars between 2012 and 2023, with overall cigars and pipe tobacco volumes continuing to fall. (See Figure 4, Appendix 1)

1.3. Table 1 further summarises how different cigarettes and hand-rolled tobacco are from the specialist OTP market products such as cigars.

Table One – Example of OTP differentiations - Why Cigars are different from Cigarettes

Process and Procedure	Cigars	Cigarettes
Import and Manufacture	Small family-owned manufacturers, small family-owned UK distributors that import cigars into the UK (4-50 employees).	Large multi-national corporations with subsidiary companies based in each market ('000s of employees).
Product	100's of varied sizes and gauges.	Homogeneous product.
Product	All products that arrive in the UK must be manually labelled with Health Warnings by hand to ensure UK market compliance.	UK-specific products produced, labelled as part of automated production (Printed Health Warnings).
Packaging	Sold in different quantities according to product dimensions (e.g., 6s, 8s, 10s, 20s, 24s, 50s & 100s).	Sold in packs of 20
Packaging	Cedar boxes to prevent insect damage and to optimise humidity (preventing mould on a natural product).	Cardboard packs or plastic-wrapped pouches.
Storage	Specialised humification and temperature control throughout the supply chain at 70% and 18 degrees.	Ambient bulk storage.
Track & Trace	Manual (by hand) labelling processes across small volumes.	Automated process across large volumes.
Retail	Specialist family-run stores that are legally defined by the minimum percentage of turnover derived from *OTP	FMCG products, with most of the volume sold via national grocery stores or convenience multiple chains.
Retail Throughput	Sell-out is often slow - it can be over several years (*SMCG) as the product matures.	Fast throughput via high street throughput is measured in weeks (*FMCG).

***SMCG – Slow Moving Consumer Good | *FMCG – Fast Moving Consumer Good**

2. Previous Governmental consideration of Other Tobacco products

2.1. In a significant Government policy announcement, Neil O'Brien, former Minister for Primary Care and Public Health, stated in his speech on achieving smokefree 2030 at the DHSC Webinar on April 4, 2023:

"...The Khan Review last year advocated the 'New Zealand' approach this would be a major departure from policy pursued over recent decades, which has emphasised personal responsibility and help for people to quit. And it is the help for current smokers to quit that we want to focus on there is much more we can do to help people quit smoking...."

2.2. The UK Government's initiatives to prevent and reduce the consumption of tobacco products have primarily targeted cigarettes and hand-rolling tobacco, the combination of which accounts for the vast majority of tobacco products consumed in Great Britain. (see Figure 3, Appendix 1)

2.3. In many instances, the introduction of policy measures has, by default, been extended to OTPs. This has often been despite a lack of evidence regarding the minor degree to which, if any, the inclusion of OTPs would further the government's stated policy objectives.

2.4. More recently, however, the government has recognised that OTPs comprise products distinct from cigarettes and hand-rolling tobacco in terms of their market structure, distribution networks, the profile of consumers they attract, and their use patterns.

2.5. This led to previous UK administrations using a split definition within the tobacco category. These definitions recognised the differences in tobacco products. They allowed for proportional and sensible exemptions for certain products from specific regulations where implementation would be impossible or where the impacts on the market and its constituent companies would be significant.

2.6. As a result, OTPs have been subject to differential treatment concerning measures such as the UK's standardised packing regulations and health warning requirements. This approach is consistent with sound, evidence-based policymaking and the government's commitment to such.

2.7. The Bill (121), as drafted, has replaced these differentiated definitions (Cigarettes, Hand Rolled Tobacco, Cigarillos, Cigars, Pipe Tobacco and others (e.g. Snuff)) with a far less balanced and generically broad categorisation of 'Tobacco Product'.

2.8. Given the government's oft-stated rationale for its smoking policy – 'to prevent young people from starting to smoke to protect them from the harms of smoking as they grow older', it is readily apparent that the inclusion of OTPs will make no measurable contribution to furthering the government's policy objectives. As previously discussed, the cost, consumer profile and extremely low volumes of such products support this argument.

2.9. Considering the devastating effect the inclusion of OTPs would have on UK small and medium-sized family-owned businesses such as Tor Imports and other business entities such as specialist tobacconists, we urge the government to reconsider the inclusion of OTPs within the Tobacco and Vapes Bill (121) and realign themselves with the previously well-thought-out and practical differentiated strategy.

3. Credibility of data & the Impact Assessment (IA) 2024

3.1. The Impact Assessment supporting the legislation relies exclusively on data about mass-market tobacco products (such as cigarettes), which are primarily manufactured and distributed by multi-national tobacco companies. (See Appendix 3 for IA-specific analysis). This focus of the IA extends to cigarette consumption, sales, revenue, margins, risk reduction, costs, business impacts, and investment levels.

3.2. Whilst the IA mentions cigarettes 130 times, it does not consider cigars, cigarillos, or pipe tobacco adequately; indeed, the word 'cigar' is mentioned only three times.

3.3. Further, at no point within the IA is either the word 'Importer' or 'Distributor' mentioned. These are often small to medium family-owned enterprises, such as Tor Imports, and represent the primary representation and route to market for over 90% of all handmade cigars within the UK.

3.4. The UK's Government command paper 'Stopping the Start: Our New Plan to Create a Smokefree Generation' refers to New Zealand's Smokefree 2025 Action Plan as an example of how such an age ban would work. The committee should note that the new coalition government of New Zealand reviewed and repealed this act before it took effect, reasoning that the negative impact on tax revenues and implementation complexity made the act unworkable in its present form. Therefore, The UK would be embarking on an experiment with little evidence or learnings

of how an age ban may practically be implemented or without any evidence base (from the IA or other international case studies) of the significant cost to companies operating as legally compliant entities within the OTP marketplace

3.5. It should also be noted that the producers of OTPs (for example, handmade cigars) that supply companies such as Tor Imports, whilst not based in the UK, are also predominately small family-owned enterprises. Manufacturing countries such as Honduras, the Dominican Republic, and Cuba see the crafting of cigars as part of their cultural heritage, and a letter recently sent to the Foreign Minister outlined that approximately 300,000 people depend on this industry. Again, no account of this specific supply route or the commercial and cultural impact was considered within the IA.

3.6. Given the Government's commitment to evidence-based policymaking and the lack of evidence presented in support of including cigars/cigarillos, urgent reconsideration of the measure's scope by Parliament is required.

3.7. Although the Government's goal of protecting young people from the harms of smoking and vaping is a laudable one, the inclusion of cigars/cigarillos in the measure to ban the sale of tobacco products to those born on or after 1 January 2009, will do nothing to advance this objective.

3.8. The inclusion of OTPs with little or no consideration of their inherent characteristics and market specifics in comparison to cigarettes and hand-rolled tobacco is an oversight which also comes with significant unintended consequences for SME companies such as Tor Imports Ltd

4. Direct Impact on Tor Imports as a Company

4.1. Tor Imports survives because its expertise (operationally and commercially) is tailored to the niche market within which it operates.

4.2 Unlike cigarettes and RYO tobacco, all our handmade cigars must be stored in controlled conditions at 70% humidity & 18 degrees of temperature. This is a high-cost and specialised supply route with high complexity.

4.3. Our portfolio consists of 496 individual product SKUs. Many of these sell in small numbers each year. This starkly contrasts the highly consolidated brand portfolios of the cigarette and RYO multi-nationals, where typically, a few brands and SKUs sell in the millions each year.

4.4. Each cigar brand or product is unique in size, packaging, and pack configuration. For example, Tor Imports has five main enclosure styles for cigars (Cabinet, hinge, pack, special edition, and bundle), each of which is optimised for storing a specific type of cigar. The smallest is 12cm by 9cm; the largest is 21cm by 33 cm. A cigarette pack is 15 times smaller than our largest format. This means that Tor Imports needs 334 cigar box sizes, all optimised for the different cigars in each box. The product and its variety and specific care requirements dictate that automated mass market processes are impossible to implement. (see Appendix 3)

4.5. There are no market-specific products due to the low volume of the UK specialist cigar market. All cigars Tor imports into the UK are produced to global specifications. A significant element of Tor Import's expertise is the correct and legal manual labelling of these products before release onto the UK market. For example, in 2023, Tor Imports hand-applied more than 172,000 labels on its cigar boxes to ensure compliance with UK regulations. Such is the high volume of the UK's cigarette and RYO market, where brands are specifically produced for the UK market in extensive

automated production facilities, labelling can be directly printed onto packs as an integral part of manufacturing at a low cost.

4.6. These specific skill sets and manual operational processes, along with the relationships and agility that come from being modest in size, give us our competitive advantage over larger companies in the mass-market tobacco sector or other FMCG players in adjacent markets (such as vaping or nicotine pouches). We have neither the scale nor investment required to diversify into new markets.

4.7. The Tobacco and Vapes Bill (2023-24) will effectively close our market down over time, making our now legal business impossible to operate legally within the UK.

4.8. Tor Imports complies with all current Government tobacco legislation and has operated HMRC-approved Customs and Excise Bonded facilities for many years. We acknowledge the harm that smoking does to health and support the government's aims in reducing smoking rates and, specifically, in preventing young people from starting smoking. However, as currently drafted, The Tobacco and Vapes Bill (121) would make compliance extremely difficult and impossible for companies such as Tor Imports Ltd.

4.9. We believe the UK's Government does not intend to burden SMEs with any new legislation disproportionately. However, the proposed Bill (121) will dramatically impact the people who own, operate and work with Tor Imports Ltd.

4.10. Our communities and rural economies will be poorer because of this bill, as will our cigar-making partners in some of the poorest countries in Central America.

4.11. Considering our operation in 2023, eighteen full-time secure jobs in a rural economy would be under threat. There are few such quality jobs available within rural communities.

4.12. The Imported Tobacco Products Advisory Board (ITPAC) analysis in November 2024 valued the specialist tobacco market at £233m (Turnover), representing a total tax contribution to the Exchequer of £93m.

4.13. Five hundred eighteen people were employed directly by specialist manufacturers, distributors, and retailers.

4.14. Other unintended consequences of the inclusion of OTP in the Tobacco & Vapes Bill (121): -

- Significant reduction in consumer choice with an estimate that over 90% of OTP products will no longer be supplied to the UK market. (Internal Tor Imports assessment of own portfolio.)
- The loss of commercial expertise as companies such as Tor Imports become unviable.
- Impact of the closure of Tor Imports on the local economy and broader impact of removing employee expenditure within this local community.
- The UK loses its global leading position in Handmade cigars, with potential knock-on effects on tourism (Especially in Central London)
- The closure of most retail specialist SMEs across the country
- Consumer choice of a legal product will be significantly curtailed.

- The potential for legal and non-legal purchases will increase significantly, primarily via non-UK-based online suppliers
- Potential for illicit operators avoiding UK duty and compliance requirements to fill the gap.

Conclusion and Actions

- We recommend that an updated IA that includes the specific impacts on our products, customer base, suppliers and specific companies be commissioned.
- That the differences between OTPs and mass-market tobacco products and the impacts on their respective markets should be carefully measured, and exemptions should be applied for OTPs.
- We ask that due consideration be given to the active process of an elected government making a legal industry illegal over time.

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Appendix One – Data referenced in the submission

Figure One – OTP as consumed by older consumers and are not initiation products

Cigars/cigarillos are not initiation products consumed by young people

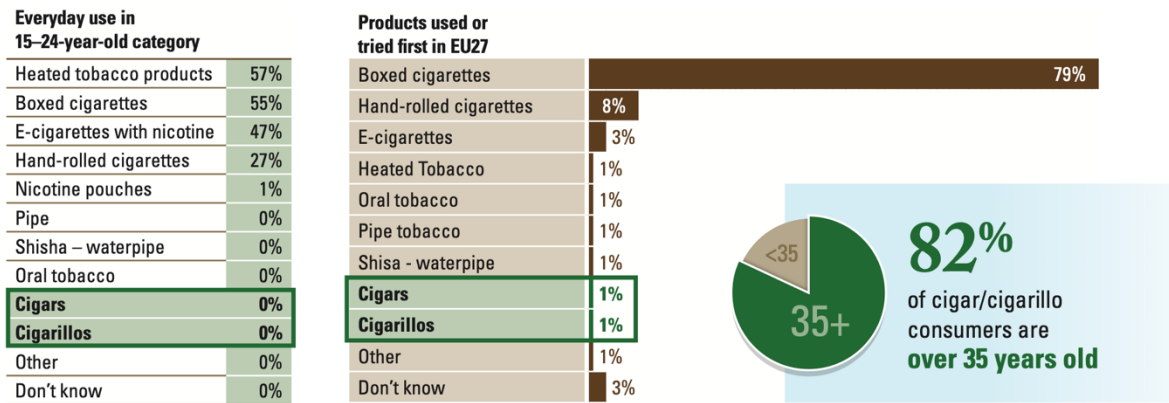


Figure Two – OTPs are predominately consumed on an occasional basis versus cigarettes

Use of tobacco and nicotine products in the EU

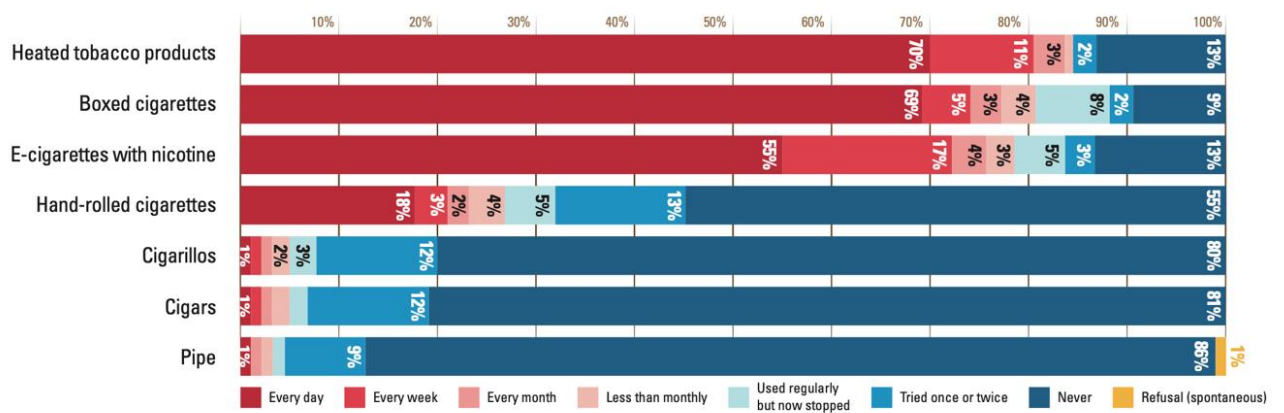
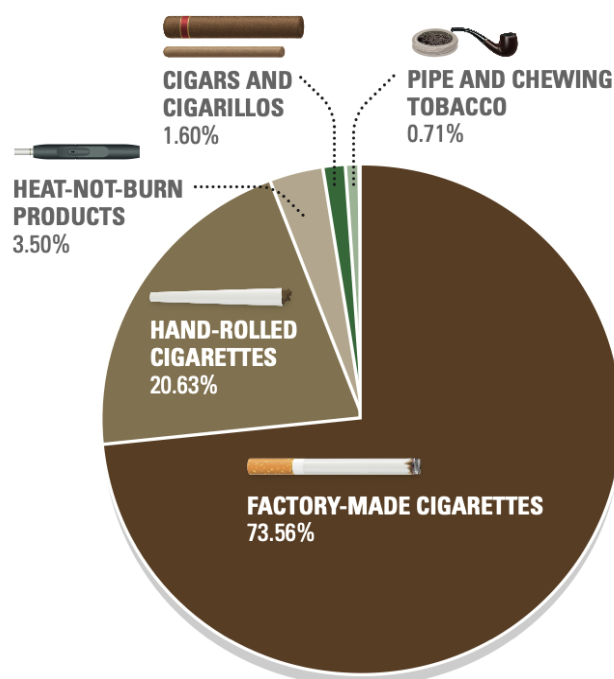


Figure Three - OTP as part of the total tobacco market



Source: REPORT FROM THE COMMISSION on the establishment of a substantial change of circumstances for heated tobacco products in line with Directive 2014/40/EU, June 2022

Figure Four - Cigars and other OTPs are not attractive switching products for higher volume categories such as cigarettes.

Most Member States that have implemented plain packaging have exempted cigars/cigarillos, taking into account their unique characteristics, and also without creating a shift in consumption towards these products – as attested in the table below:

	2014	2015	2016	2017	2018	2019	2020	2021	2022
Belgium	299,9	292,3	285,3	269,9	260,1	252,1	247,6	234,9	227,4
Denmark	126,0	84,0	66,0	56,0	48,0	38,0	41,0	20,0	22,0*
France	1.365	1.327	1.237	1.239	1.239	1.227	1.189	1.142	1.041
Netherlands	463,3	466,3	457,4	434,9	416,3	408,3	405,7	402,9	389,3
Slovenia	31	33	29,8	26,6	21,1	18,6	20	18,6	17,5

Cigars/cigarillos placed on selected markets, expressed in millions of pieces. Yellow highlight indicates entry into force of plain packaging requirements for FMC and RYO¹

Appendix Two – Australian Links on the Growth of Illicit Trade and Organised Crime Activity

1. <https://www.spiked-online.com/2024/09/05/in-australia-the-tobacco-war-has-been-a-disaster/>
2. <https://www.theguardian.com/australia-news/2024/nov/12/victoria-tobacconist-firebombings-fit-and-proper-test>
3. <https://reason.com/2024/06/17/the-deadly-tobacco-drug-war-down-under/>

Appendix Three – IA Analysis

Area of Concern	IA Reference	IA Extract	Observed Issues
Data Used	Whole report	All studies quoted/data based on cigarette smokers. ONS 2022 Adult Smoking Study has been used as a source for UK-based data.	No data on OTP consumption has been collected by ONS since 2016 due to the 'statistical insignificance " of these products.
Modelling of policy impacts on smoking rates/behaviours	Whole Report	The model used to assess the legislation relies exclusively on surveys of youth and adult cigarette smoking from which the smoking of cigars and other tobacco products is excluded in the survey questions: -UCL's Smoking Toolkit Study -ONS Adult smoking habits in the UK -NHS Digital's Smoking, Drinking and Drug use among young people in England	There is no support for the inclusion of OTPs as supporting the Bill's objective of stopping youth initiation and nicotine addiction, a problem which is particular to cigarette and hand-rolling tobacco consumption.
Retail Impact	Whole Report	All data has been based on cigarette sales via retail outlets such as newsagents and supermarkets, which offer a variety of products from which to generate other revenue.	The retail impact is likely to be significantly higher if the loss of OTP sales is taken into account. There are around 150 specialist tobacconists in the UK. Specialist importers and distributors mainly supply them. These businesses will close because of this legislation.
Loss of profit for Retailers	Sections 231 to 236	"We have used the average price of cigarettes and applied this to consumption values to estimate the loss in profit for retailers ".	Loss of profit resulting from a decline in sales of OTPs has not been assessed.
Increase in profits from less expenditure on tobacco	Section 241/242	"It is likely that losses estimated will at least in part be offset by increased profits on goods and services purchased in place of tobacco. Specifically for retailers, these goods will also likely carry a higher profit margin than tobacco".	There are no alternative products to OTPs that can be substituted in the case of Specialist Tobacconists. OTP margins are between 25% to 40%, not the stated 6% for cigarettes. Impact on OTPs not assessed or quantified.
Impact on Wholesalers	Section 252 - 255.	"The methodology for estimating lost profits for wholesalers is the same as for retailers above, with the only change being the overall profit per pack lost". "Therefore, based on an estimated 4 billion fewer factory-made packs of cigarettes sold between 2027 and 2056,	Cigarette data used. Impact on OTPs not assessed or quantified.

		Table 23 shows the estimated total costs in lost profits to wholesalers in England and the UK (borne by all tobacco wholesalers, and over 30 years)".	
Impact on Manufacturers and Shareholders:	Section 256-260	Profit estimates for manufacturers are based on information obtained through the Standardised Packaging of Tobacco (SPoT) impact assessment consultation. For manufacturers, this was £0.22 per pack of factory-made cigarettes. In 2027 prices, this is £0.29.	OTPs not considered as not subject to SPOT. <u>Significant data has been shared on this in previous consultations.</u>
Impact on Tourism	Section 299	"The smoke-free generation policy may make the UK a less attractive place to come for tourists, immigrants, and international students who are smokers. As we do not have evidence on the impact this policy would have on tourism and immigration, we have not been able to quantify this impact. However, for the reasons explained above, we expect this impact to be minimal".	UK reputation for centre of excellence for OTPs and particularly cigars. It attracts collectors, tourists, and connoisseurs who visit the UK for this purpose. Their spending on hotels, restaurants, and shopping is significant. The impact on tourism is significant.
International investment	Section 303	"As we do not have evidence on the impact this policy would have on international investment, we have not been able to quantify this impact".	OTPs and particularly cigars, attract investment through hotels and restaurants who sell the product and invest significantly in their offering or their clients. International Cigar Brands invest in the UK market.
Small and Micro Business Assessment (SaMBA)	Section 318, 319	"Although we are aware of a limited number of small and micro tobacco product manufacturers that are based in the UK, who mainly appear to produce a diverse range of specialist tobacco products, we have not been able to identify sufficient data on these businesses to estimate the loss in profit for these specific businesses as a result of the smokefree generation policy". 319. "With reference to the RPC's SaMBA checklist, the very limited data we have	Significant representations were made clearly setting out the impact on these businesses and have been made in previous consultations. The Consultation response stated that the views of anyone connected to the tobacco industry had been disregarded-using Article 5.3 of the WHO Framework Convention.

		been able to identify does not enable us to: i) identify the number of businesses in scope of the regulation; ii) the market share of these businesses; iii) what the impact would be in these businesses - not least because we do not have data on what proportion of their sales are overseas to determine what proportion of their sales are unaffected by this policy"	Manufacturers and Importers are obliged to submit this data to DHSC every year so it is readily available. Track and Trace requirements also mean this information is readily available.
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January 2025.