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Supplementary Information for Consultation from Essentra

1. Critical factors governing a TT&A system: determining responsibility and accountability

Regulatory specification which limits the commercial options of operators leads to lower competition amongst suppliers which will in turn reduce the cost effectiveness of solutions deployed.

Commercially relevant and competitive solutions operated by the industry will ensure that deployments are rigorously assessed against competing technologies to ensure the most cost effective solution is used and the impact of cost to end consumers and the industry are minimized.

Authentication features that exhibit the appropriate level of robustness to protect consumers and tax revenues should be considered to ensure that where track and trace systems are used the coding is protected from counterfeiters by ensuring the pack featuring the unique code is the genuine unique pack.

By setting an open specification which determines the purpose and the function of the TT&A solution, legislative bodies should be enabled to prescribe the terms of reference for external audit of compliance and effectiveness of the systems and solutions chosen by industry.

2. Methods of adding security features

No single solution or innovation should be considered in isolation, moreover layers or combinations of security which can be varied from time to time thus avoiding creating a counterfeiters blueprint is preferable.

Security features which can readily be separated from the product or packaging and re-applied to counterfeit goods should be deprioritized in the layers chosen by operators and industry

OPEN LIST - Regulators should frame open specification legislation which enhances the ability to deploy variable and layered solutions so that authorities and industry can stay one step ahead of counterfeiters

Should any system be deployed with no list, or an open list, technical standards must ensure that there is no opportunity for misinterpretation of the result measured. Security features although part of an open specification must facilitate and definitive authentic/counterfeit determination without interfering unduly with operating efficiencies of packaging functionality.

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If sensible legislation is implemented there should be no requirement for sharing of commercially sensitive information on features used, and not sharing information would reduce risk of details passing to counterfeiters. Details should be assumed to be on a need to know basis.

The industry / manufacturer should identify seized products as genuine or counterfeit in collaboration and support of regulators. This will ensure reliable measurement using the correct verification technique. It will also enable the company whose product is counterfeited to implement corrective security measures can be taken.

3. Cost and equipment

Open specification allowing commercial competition amongst the supply base for such technologies will improve the cost benefit ratio. Application should be at cost of industry (TT&A will pay for itself in reality) but measurement and compliance should be at cost of regulatory jurisdiction.