



## MEETING OF THE SUBGROUP ON TRACEABILITY AND SECURITY FEATURES

### - SUMMARY RECORD -

**Date: 14 February 2019**

**Place: Brussels**

#### **1. Welcome and Introduction**

SANTE welcomed all participants to the second Meeting of the Subgroup on Traceability and Security Feature of the year. The Chair outlined that the meeting was composed of an open and a closed session. During the open part of the meeting, repository providers and all appointed ID issuers were invited to participate. The main aim of this part was it to provide a forum for discussion among service providers involved in the traceability system and regulators. During the closed part of the meeting, participation was restricted to public authorities. The Chair reminded the group that the minutes from the webinar of 12 February would be considered as a part of the minutes of Meeting of the Subgroup of 14 February. Minutes of the previous meeting were still in circulation for comments.

The Chair presented the agenda for the open part of the meeting. The group approved the agenda. No additional points were added.

#### **2. Presentation by 'Dentsu' on modalities of the secondary repository services**

Dentsu Aegis Network Switzerland AG, provider of the secondary repository, gave a presentation on the latest updates related to the establishment of the secondary repository and the router, including technical aspects of the envisaged system structure. The group was informed that draft technical specifications and the draft data dictionary had been shared with repository providers and ID issuers for initial comments. Final publication of these documents would be 21 February 2019. Dentsu furthermore outlined different aspects of data integrity and confidentiality and how these would be safeguarded within the system. The presentation also set out the timeline for further steps in the implementation process. Dentsu then presented the outcome of the first technical workshop with other service providers, which took place on 7 February 2019. In this regard, Dentsu thanked other repository providers and the ID issuers for the good and productive cooperation. Finally, Dentsu outlined a number of open issues that had arisen during the workshop, which the group then discussed.

On verification of company information in the context of requests for identifier codes, the group agreed that this was the responsibility of individual ID issuers, who would enter into a business relationship with the requesting parties. This was also necessary to settle any fees charged. The verification could take place ex-ante or ex-post, but ID issuers should take into account the required time limits for issuing identifier codes, as well as the volume of requests expected in the initial phase of the system.

On the possibility for ID issuers to allow for speedy issuing of UIs, SANTE reminded that the legislation provided for a time limit of two working days (for electronic delivery) and that the requesting parties had the possibility to cancel any request by means of a recall message within one working day. Where, upon wish of the requesting party, the ID issuer agreed to speed up the issuing of UIs within a shorter time frame than the legally required two working days, the group agreed that the requesting party should be informed about and effectively assume the financial risks. Once the UIs are generated and issued, the recall message becomes ineffective and all fees related to the generating and issuing of such UIs as well as their storage in the repositories system apply and will be borne by the requesting party. From that moment, the unwanted UIs can be only deactivated.

On registration requirements in the case of vending machines (VMs) and vending vans (VVs), SANTE referred to previous discussions of the Subgroup, as well as the messaging requirements set out in Annex II to the Implementing Regulation. VMs fall into the category of first retail outlets and had to be registered as facilities. VVs, on the other hand, demonstrated a specific mode of transportation and the van used to carry out the transport would be identified through the information on the 'transport vehicle' in the respective dispatch message that was sent to the traceability system.

On the question of transloading vs. short-term storage, SANTE referred to Q5 of the published Questions & Answers document on the website, which clarified that, regardless of its duration, storage had to be differentiated from transloading events.

SANTE thanked Dentsu for the very valuable presentation and the good progress that had been made, also considering the time constraints under which all parties operated.

### **3. Introduction and feedback from providers of primary repositories**

The Chair invited providers of primary repositories present in the room to give a short presentation and feedback. Overall, all providers confirmed and thanked for the good cooperation with Dentsu. First tests with economic operators had been initiated and showed promising results.

One repository provider asked whether recalled and non-validated messages would have to be kept in the repository system. SANTE reminded that all information recorded in the system had to be stored in accordance with the applicable retention periods. The legislation required the secondary repository to contain a copy of all data stored in the primary repositories. It followed from this that all messages transmitted to the primary repository, even those that did not pass the validation process, had to be forwarded to the secondary repository. The failed validation had to be appropriately reflected in the records of the concerned repositories.

Another participant raised a question regarding the splitting of transactional information that economic operators transmitted to the router. Splitting would always involve the risk

of harming the integrity of the data. SANTE took note of these remarks. In terms of transactional data, it explained that splitting of a message should only take place at the level of the data fields related to the unit level unique identifiers concerned. The latter allowed for identifying the primary repositories to which the transactional information had to be forwarded by the router. Other data fields, such as total net sum, should not be split but a full copy of these data fields should be forwarded to each of the primary repositories concerned.

#### **4. Discussion between public authorities, ID issuers and providers of repository services**

One Member State enquired into the possibility to provide national authorities with access to Dentsu's 'knowledge base', which contained the technical documents for ID issuers and repository providers. Dentsu informed Member States that that it would create special profiles for national authorities and for national administrators.

On validation of the information in requests for unit level UIs, in particular the existence of identifier codes (i.e. EOIDs, FIDs and MIDs), the legislation required that this must take place at the level of the secondary repository. More specifically, the router, which will receive each generated UI for validation before it gets transmitted to the primary repository. Upon the request of a number of Member States, Dentsu offered to provide a separate interface that would allow ID issuers to receive confirmation on the existence of foreign identifier codes (i.e. such that were generated by another ID issuer). For reasons of data protection, this information would be limited to a simple existence check. SANTE clarified that this was an additional feature, not required under the legislation. While it would enable ID issuers (if they wished to do so) to carry out pre-validation checks before generating UIs, it would not remove the obligation of the final and official validation of generated UIs to take place at the level of the router.

One service provider asked for clarification on the application of Article 4(5) of the Implementing Regulation. SANTE reiterated that there was a legal obligation for Member States to appoint an ID issuer and to ensure the operational functionality of that entity in time.

On the deactivation of UIs, it was clarified that the repositories system had to ensure that unique identifiers not used within the six months timeframe of validity were automatically deactivated. In addition, such deactivation could also take place manually and at an earlier point in time, either executed by a national authority (e.g. in the context of an enforcement action) or by the economic operator itself (e.g. where a pre-ordered set of UIs was no longer needed / where it failed validation and could not be used).

Another question concerned an information request regarding the graphical interfaces that would be made available to public authorities. Dentsu thanked for this intervention and responded that it would be happy to engage with Member States in relation to their wishes (e.g. specific automatic query functions). Dentsu promised to look into the possibility of organising a specific meeting with Member States to discuss this matter more in detail. Member States agreed and thanked for this proposal.

One participant noted that it would be desirable to receive further information on the look-up tables, i.e. the flat files. SANTE recalled that each ID issuer would be responsible for preparing and regularly updating the flat files which were necessary for determining the information compressed in the product code (see Article 8(1)(c) of the

Implementing Regulation) in the offline mode. In line with Article 20(3) of the Implementing Regulation, the full collection of all the flat files maintained by the ID issuers should be stored with the secondary repository. That will allow the authorities to download the flat files from one place for regular updates of the portable reading devices. SANTE clarified that the flat files should not be mistaken for the registries of all economic operators, facilities and machines. Information-wise the former overlapped with the latter only insofar as the UIs combined with the flat files were supposed to inform about the mandatory content of message 2.1 of Annex II, including the extraction of information from the concerned identifiers used in that message.

Another Member State asked SANTE whether the competent ID issuer appointed in one Member State only had to register economic operators located on its own territory. SANTE referred to the rules on competence, as set out in Articles 14, 16 and 18 of the Implementing Regulation. Member States should furthermore take into account that rules on the request of identifier codes for importers were different. Some participants noted that they carried out verification checks on requesting entities (e.g. based on the VAT number). During the discussion, the registration obligations for the purpose of issuing identifiers were distinguished from the administrative registration of manufactures and importers that the ID issuer would need to carry out for the purpose of charging the fees for generating and issuing UIs. In response to a follow-up question, SANTE confirmed that the derogation in the second sentence of Article 4(1) of the Implementing Regulation did not affect the rules on competent ID issuers in relation to requests for identifier codes. An ID issuer competent for a Member State, who applies the derogation, therefore may have to process requests for unique identifiers originating from economic operators with identifier codes assigned by other ID issuers.

Finally, one of the participants sought clarification on the data element ‘other economic operator ID’ in message 1.1 of Annex II. SANTE explained that this information was mainly of use in two specific cases. First, importers who placed their products on more than one national market would receive identifier codes from all competent ID issuers. Second, if an economic operator, who operated under one single legal entity, was responsible for facilities in two or more Member States, it would receive identifier codes from all competent ID issuers. The data element in question would allow for proper linking of all identifiers belonging to the same economic operator. During the discussion, it was underlined that, in most cases, multinational corporations operated through their national subsidiaries, which constituted separate legal entities. Hence, this second example was less likely to occur in practice.

The Chair closed the discussion and informed the group that the open session had ended. All representatives not belonging to a Member State delegation were asked to leave the room. SANTE thanked service providers for their participation and for the interesting and valuable debate that took place.

## **5. Update from Member States on ID issuer**

The Chair announced that the first part of the closed session meeting would be dedicated to the status of the ID issuer appointment in Member States. SANTE stressed again the importance for Member States to appoint an operational ID issuer in time. Timely appointment remained the highest priority for the Commission at this point. During the update round, SANTE presented the answers from Member States to the questionnaire on the ID issuer, which were collected in the morning. The answers provided at the meeting would be annexed to the summary record of the meeting. On other aspects (competent

authority, UI delivery method, Article 4(1) derogation, etc.), Member States were asked to send any updates that may have occurred directly by e-mail. The latter was important in particular with respect to the application of the second sentence of Article 4(1) IR for which SANTE intended to make a list available online. This would be especially helpful for stakeholders and ID issuers.

As soon as the update round was concluded, SANTE informed the group that, due to the absence of some Member States, the promised informal vote on the two options of the reading of the term ‘machine’ would have to be postponed to the next Subgroup Meeting.

SANTE also encouraged Member States to appoint a national administrator as soon as possible.

## **6. AOB**

One Member State wished to clarify whether internal financial transactions taking place within the same company should be recorded. SANTE stressed that the legislation is clear on that point in that every financial event related to an invoice, payment and order needs to be recorded in the system following the occurrence of the event and once it can be linked to the UIs concerned. This also meant that, where no invoice is issued, no transactional data needs to be recorded.

Another Member State enquired whether a harmonisation of UIs at the EU level was foreseen. SANTE explained that the legislation, within its boundaries, leaves a certain degree of freedom to ID issuers who are ultimately responsible for generating and issuing UIs. To that end, Article 8 and Article 11 of the Implementing Regulation set out the required structure and content of unit and aggregated level UIs generated by the ID issuers. Where the UIs are generated by economic operators, Article 10 of the Implementing Regulation specifies that individual codes must be generated in accordance with ISO/IEC 15459-1:2014 or ISO/IEC 15459-4:2014. These requirements set out the basis for ensuring uniqueness of the codes. With regard to encoding and reading of UIs in optical format, the legislation stipulates the permitted data carriers. In this regard, the reading of UIs by scanners should furthermore be facilitated by means of integrating data qualifiers and separators into the UI string, in line with ISO/IEC 15459-3:2014, which is intrinsically linked to ISO/IEC 15459-2:2015 referred to in Article 3(4) of the Implementing Regulation.

Several participants raised questions as to the reading of Article 15(7) TPD in relation to the obligation of manufacturers to provide economic operators with the equipment necessary for the recording of tobacco products purchased, sold, stored, transported or otherwise handled. Notably, it was discussed whether this provision should be read as a one-time obligation or rather a continuous obligation. The group agreed that a one-time payment to economic operators would not be compliant with the obligations set out in that provision. In particular, Article 15(7) required that the equipment provided to economic operators must enable them to read and transmit the recorded data electronically to the repositories system. Reading and transmitting of data was an ongoing obligation that applied to economic operators for as long as they would be involved in the trade of tobacco products. The group regarded it as unlikely that any equipment provided would be able to fulfil this obligation over a longer period without requiring maintenance, or even replacement.

One Member State informed the Commission that a manufacturer in their country had not yet notified the Commission about the proposed provider of the primary repository and the related data storage contract, and was wondering whether notifying was still possible. SANTE responded that every notification received would be treated within the required deadline of three months, as set out in Annex I of the Implementing Regulation. At the same time, SANTE reminded that enforcement of the legislation on tobacco traceability was the responsibility of Member States.

On the deactivation of an economic identifier code by authorities in duly justified cases, SANTE explained to the group that a deactivation of the code would have a ‘cascade effect’ in that it would lead to the automatic deactivation of all related facility and machine identifier codes (see Article 15(4) and 17(4)). It was reminded that an alert could be introduced in the system in order to avoid that a deactivated economic operator attempts to register a second time.

Finally, the group discussed whether Union legislation on tobacco traceability set out a requirement for manufacturers/importers of tobacco products to reimburse the development of a mobile app, which could be used by national authorities to read the information encoded into UIs. Participants agreed that no such requirement was contained in Union legislation per se. However, Article 8 of the FCTC Protocol stipulated that each Party to the Protocol may require the tobacco industry to bear any costs associated with that Party’s obligations under this Article.

## **7. Closing remarks**

The Chair thanked the participants for the valuable discussion during the meeting. Participants were reminded about the upcoming meetings. Minutes of today’s meeting, including Member State updates on the ID issuer, and questions discussed during the webinar session of 12 February will be circulated for approval.

The Chair closed the meeting.

## List of participants

Austria	(Federal Ministry of Labour, Social Affairs, Health and Consumer Protection and Ministry of Finance - Tax and Customs Administration)
Belgium	(Excise & Customs and FPS HEALTH FPS Health and Food Chain Safety and Environment)
Bulgaria	(National Customs Agency)
Croatia	(Agencija za komercijalnu djelatnost and Customs Administration)
Cyprus	(Department of Customs and Excise, Republic of Cyprus and Permanent Representation)
Czech Republic	(Ministry of Agriculture and STC)
Denmark	(Danish Safety Technology Authority)
Estonia	(The Ministry of Finance of Estonia)
Finland	(Supervisory Authority for Welfare and Health)
France	(FRENCH CUSTOMS)
Germany	(Bundesdruckerei GmbH and Bundesministerium für Ernährung und Landwirtschaft)
Greece	(Independent Authority for Public Revenues and Ministry of Finance, General Secretariat for Information Systems)
Hungary	(National Tax and Customs Administration)
Ireland	(Department of Health and Office of the Revenue Commissioners)
Italy	(Custom monopolies agency)
Latvia	(State Revenue Service)
Lithuania	(State Tax Inspectorate Under the Ministry of Finance of the Republic of Lithuania)
Luxembourg	(Customs and Excise Administration and ID issuer Luxembourg)
Malta	(Customs Department)
Netherlands	(Ministerie van Volksgezondheid, Welzijn en Sport and Belastingdienst)
Poland	(Ministry of Finance)
Portugal	(Imprensa Nacional Casa da Moeda)
Romania	(C.N. Imprimeria Națională S.A. and National Agency for Fiscal Administration)

Slovakia (Ministry of Finance, Financial Directorate and Slovak Permanent Representation)

Slovenia (Ministry of Health of the Republic of Slovenia)

Spain (Agencia Tributaria. Ministerio de Hacienda y Administraciones Públicas Comisionado para el Mercado de Tabacos. Ministerio de Hacienda y Administraciones Públicas and Ministry of Finance.)

Sweden (Public Health Agency Sweden)

United Kingdom (HM Revenues and Customs)

**Observers**

Norway (Norwegian Ministry of Health and Care Services and Norwegian Directorate of Health)

**Commission:**

DG SANTE	Filip Borkowski Jan Hoffmann Sascha Maria Löwenstein Anna Mirandola Jean-Marie Misztela
DG OLAF	Clare Twomey Markus Goerres

**Annex I**  
**Update from Member States on appointment/operation of ID issuers**

<b>AUSTRIA</b>	
<b>Name of ID issuer</b>	Monopolverwaltung (state monopoly agency)
<b>Name of subcontracted party (if applicable)</b>	Bundesrechenzentrum (Austrian Federal Computing Center)
<b>Method of appointment</b>	In house
<b>Date of appointment (definite or best estimate)</b>	13.10.2018
<b>Unique identification code</b>	LEAT1
<b>Date of operation (definite or best estimate)</b>	Test phase will start in March 2019

<b>BELGIUM</b>	
<b>Name of ID issuer</b>	INCERT (most possible option)
<b>Name of subcontracted party (if applicable)</b>	No
<b>Method of appointment</b>	Ministerial decree
<b>Date of appointment (definite or best estimate)</b>	April
<b>Unique identification code</b>	
<b>Date of operation (definite or best estimate)</b>	

<b>BULGARIA</b>	
<b>Name of ID issuer</b>	Printing Works of the Bulgarian National Bank
<b>Name of subcontracted party (if applicable)</b>	Yes
<b>Method of appointment</b>	Resolution of the National Assembly
<b>Date of appointment (definite or best estimate)</b>	November 2018 / State Gazette of 27.11.2018
<b>Unique identification code</b>	LEBGR
<b>Date of operation (definite or best estimate)</b>	April 2019

<b>CROATIA</b>	
<b>Name of ID issuer</b>	Agencija za komercijalnu djelatnost d.o.o. (AKD D.O.O)
<b>Name of subcontracted party (if applicable)</b>	-
<b>Method of appointment</b>	Ordinance
<b>Date of appointment (definite or best estimate)</b>	Date of appointment-Ordinance entered into force on 19.07.2018_State Gazette,No. 61/2018 from 11.07.2018 National application of Article 4(1)-derogation- Ordinance on Amendments of Ordinance- entered into force on 15.12.2018, State Gazette, No. 110/2018, from 7.12.2018.
<b>Unique identification code</b>	LEAKD Information related to unique identification code of appointed ID issuer has been made publically available <a href="http://wp1.edifice.org/iso-15459-license-plate-2/list-of-license-plate-codes-assigned-by-edifice/">http://wp1.edifice.org/iso-15459-license-plate-2/list-of-license-plate-codes-assigned-by-edifice/</a>
<b>Date of operation (definite or best estimate)</b>	March 2019

<b>CYPRUS</b>	
<b>Name of ID issuer</b>	Greek ID issuer - General secretariat of information systems
<b>Name of subcontracted party (if applicable)</b>	-
<b>Method of appointment</b>	-
<b>Date of appointment (definite or best estimate)</b>	-
<b>Unique identification code</b>	LE GR 1
<b>Date of operation (definite or best estimate)</b>	-

## CZECH REPUBLIC

<b>Name of ID issuer</b>	State printing works of securities
<b>Name of subcontracted party (if applicable)</b>	Atos IT Solutions
<b>Method of appointment</b>	Resolution of the Government of the Czech Republic
<b>Date of appointment (definite or best estimate)</b>	17.10.2018
<b>Unique identification code</b>	LESTC
<b>Date of operation (definite or best estimate)</b>	March 2019/April 2019

<b>DENMARK</b>	
<b>Name of ID issuer</b>	Wordline SA
<b>Name of subcontracted party (if applicable)</b>	
<b>Method of appointment</b>	Public procurement
<b>Date of appointment (definite or best estimate)</b>	05.03.2019
<b>Unique identification code</b>	LEWL2
<b>Date of operation (definite or best estimate)</b>	Ready to be tested in March

<b>ESTONIA</b>	
<b>Name of ID issuer</b>	-
<b>Name of subcontracted party (if applicable)</b>	-
<b>Method of appointment</b>	Contract after negotiation
<b>Date of appointment (definite or best estimate)</b>	ASAP and in time
<b>Unique identification code</b>	-
<b>Date of operation (definite or best estimate)</b>	-

<b>FINLAND</b>	
<b>Name of ID issuer</b>	To be determined/ Decision will be made on the 12 <sup>th</sup> of March 2019
<b>Name of subcontracted party (if applicable)</b>	To be determined
<b>Method of appointment</b>	Tender for a concession (procurement process)
<b>Date of appointment (definite or best estimate)</b>	Beginning of April 2019
<b>Unique identification code</b>	To be determined
<b>Date of operation (definite or best estimate)</b>	May 2019

<b>FRANCE</b>	
<b>Name of ID issuer</b>	-
<b>Name of subcontracted party (if applicable)</b>	-
<b>Method of appointment</b>	Decree State Council
<b>Date of appointment (definite or best estimate)</b>	Estimated March 2019
<b>Unique identification code</b>	-
<b>Date of operation (definite or best estimate)</b>	20.03.2019

<b>GERMANY</b>	
<b>Name of ID issuer</b>	Bundesdruckerei GmbH
<b>Name of subcontracted party (if applicable)</b>	-
<b>Method of appointment</b>	Legal act / contract / decree
<b>Date of appointment (definite or best estimate)</b>	Best estimate: In due time
<b>Unique identification code</b>	QCBDR
<b>Date of operation (definite or best estimate)</b>	Best estimate: The ID issuer will be fully operational on 10 <sup>th</sup> May 2019.

<b>GREECE</b>	
<b>Name of ID issuer</b>	General secretariat of information systems
<b>Name of subcontracted party (if applicable)</b>	Pending (contract with subcontractor to be signed in next weeks)
<b>Method of appointment</b>	Ministerial Decree
<b>Date of appointment (definite or best estimate)</b>	26.06.2018
<b>Unique identification code</b>	LEGR1
<b>Date of operation (definite or best estimate)</b>	-

<b>HUNGARY</b>	
<b>Name of ID issuer</b>	ND Nemzeti Dohanykereskedelmi Nonprofit Zrt.
<b>Name of subcontracted party (if applicable)</b>	Still cannot be named (ongoing)
<b>Method of appointment</b>	Decree 72/2018, Government decree
<b>Date of appointment (definite or best estimate)</b>	06.05.2018
<b>Unique identification code</b>	LEHU1
<b>Date of operation (definite or best estimate)</b>	Still depends

<b>IRELAND</b>	
<b>Name of ID issuer</b>	Allexis s.r.o.
<b>Name of subcontracted party (if applicable)</b>	N/A
<b>Method of appointment</b>	Public procurement
<b>Date of appointment (definite or best estimate)</b>	End of February 2019 (estimated).
<b>Unique identification code</b>	QCALL
<b>Date of operation (definite or best estimate)</b>	1 May 2019

<b>ITALY</b>	
<b>Name of ID issuer</b>	Custom Monopolies agency
<b>Name of subcontracted party (if applicable)</b>	-
<b>Method of appointment</b>	National decree
<b>Date of appointment (definite or best estimate)</b>	April 2019
<b>Unique identification code</b>	Not yet
<b>Date of operation (definite or best estimate)</b>	April 2019

<b>LATVIA</b>	
<b>Name of ID issuer</b>	VAS „Latvijas Radio un televīzijas centrs
<b>Name of subcontracted party (if applicable)</b>	SIA “ZZ Dats”
<b>Method of appointment</b>	Law
<b>Date of appointment (definite or best estimate)</b>	29.12.2018
<b>Unique identification code</b>	IAC not acquired yet
<b>Date of operation (definite or best estimate)</b>	Operational by end of the March

<b>LITHUANIA</b>	
<b>Name of ID issuer</b>	State tax inspectorate
<b>Name of subcontracted party (if applicable)</b>	Worldline and Insoft
<b>Method of appointment</b>	Public procurement for subcontractor
<b>Date of appointment (definite or best estimate)</b>	January 2019, finished
<b>Unique identification code</b>	After agreement/contract with company Worldline on March 15 <sup>th</sup> Waiting response from 'AIM' for prefix 'KLT'
<b>Date of operation (definite or best estimate)</b>	As soon as possible

<b>LUXEMBOURG</b>	
<b>Name of ID issuer</b>	Incert G.I.E.
<b>Name of subcontracted party (if applicable)</b>	-
<b>Method of appointment</b>	Ministerial Decree
<b>Date of appointment (definite or best estimate)</b>	23.11.2018
<b>Unique identification code</b>	-
<b>Date of operation (definite or best estimate)</b>	End of March

<b>MALTA</b>	
<b>Name of ID issuer</b>	Opsec
<b>Name of subcontracted party (if applicable)</b>	N/A
<b>Method of appointment</b>	Public negotiation procedure
<b>Date of appointment (definite or best estimate)</b>	13.11.2018
<b>Unique identification code</b>	Now issued through ITSA: WAAØ
<b>Date of operation (definite or best estimate)</b>	End of April 2019

<b>NETHERLANDS</b>	
<b>Name of ID issuer</b>	ATOS
<b>Name of subcontracted party (if applicable)</b>	Worldline
<b>Method of appointment</b>	Concession
<b>Date of appointment (definite or best estimate)</b>	31.01.2019
<b>Unique identification code</b>	Ordered
<b>Date of operation (definite or best estimate)</b>	01.03.19 – pilot 20.03.19 – roll-out phase 20.05.19 – go live

<b>POLAND</b>	
<b>Name of ID issuer</b>	Polish Security Printing Works (PWPWS.A.)
<b>Name of subcontracted party (if applicable)</b>	N/A
<b>Method of appointment</b>	Legislative process is still in progress
<b>Date of appointment (definite or best estimate)</b>	April 2019
<b>Unique identification code</b>	QCPWPW
<b>Date of operation (definite or best estimate)</b>	No later than 15 May

<b>PORTUGAL</b>	
<b>Name of ID issuer</b>	Imprensa Nacional Casa de Moeda - INCM
<b>Name of subcontracted party (if applicable)</b>	N/A
<b>Method of appointment</b>	Decree
<b>Date of appointment (definite or best estimate)</b>	Concluded 15/02/2019
<b>Unique identification code</b>	It will be based on GS1
<b>Date of operation (definite or best estimate)</b>	02.05.2019 / Start testing in March

<b>ROMANIA</b>	
<b>Name of ID issuer</b>	Compania Nationala Imprimeria Nationala S.A. , The national printing house of Romania
<b>Name of subcontracted party (if applicable)</b>	N/A
<b>Method of appointment</b>	Government decision (No. 1020/2018 M.O.F 38/15.01.2019)
<b>Date of appointment (definite or best estimate)</b>	15.01.2019
<b>Unique identification code</b>	LECNI
<b>Date of operation (definite or best estimate)</b>	Recently appointed, not clear yet.

<b>SLOVAKIA</b>	
<b>Name of ID issuer</b>	Datacentrum (Public Authority under the Ministry of Finance)
<b>Name of subcontracted party (if applicable)</b>	Subject of public procurement
<b>Method of appointment</b>	Legal act
<b>Date of appointment (definite or best estimate)</b>	01.05.2019
<b>Unique identification code</b>	LEDTC
<b>Date of operation (definite or best estimate)</b>	To be determined after appointment

<b>SLOVENIA</b>	
<b>Name of ID issuer</b>	Not yet appointed
<b>Name of subcontracted party (if applicable)</b>	
<b>Method of appointment</b>	Public tender will be published online. The legal base for tender was adopted on 7.03.2019. It was published in OJ on 8.3 (OJ, No 14 14.2019)
<b>Date of appointment (definite or best estimate)</b>	May 2019
<b>Unique identification code</b>	
<b>Date of operation (definite or best estimate)</b>	May 2019

<b>SPAIN</b>	
<b>Name of ID issuer</b>	Fabrica Nacional de Moneda y timbre (www.fnmt.es)
<b>Name of subcontracted party (if applicable)</b>	Not yet decided
<b>Method of appointment</b>	Ministerial order HAC 1365/2018 (BOE OJ nr. 308-22/DEC/18)
<b>Date of appointment (definite or best estimate)</b>	Definite: 23.12.2018 (BOE (OJ) nr. 308 of 22.12.2018)
<b>Unique identification code</b>	1E
<b>Date of operation (definite or best estimate)</b>	20 of March (testing) 20 of May (production)

<b>SWEDEN</b>	
<b>Name of ID issuer</b>	Public Health Agency Sweden appointed by 1 March, but actual ID issuer will be procured
<b>Name of subcontracted party (if applicable)</b>	Procurement started (last day for tender 19 <sup>th</sup> of March)
<b>Method of appointment</b>	Public procurement
<b>Date of appointment (definite or best estimate)</b>	End of April
<b>Unique identification code</b>	Pending procurement
<b>Date of operation (definite or best estimate)</b>	May 2019, with possible delay

<b>UNITED KINGDOM</b>	
<b>Name of ID issuer</b>	De la Rue
<b>Name of subcontracted party (if applicable)</b>	Atos
<b>Method of appointment</b>	Concession contract
<b>Date of appointment (definite or best estimate)</b>	February 25 <sup>th</sup> 2019
<b>Unique identification code</b>	QCGDLR
<b>Date of operation (definite or best estimate)</b>	In time for May