

EU SYSTEM OF TOBACCO TRACEABILITY: COMMON REPORTING MISTAKES



This document has been created at the request of the EU Expert Subgroup on Traceability and Security Features. It sets out a list of common mistakes observed during the first number of months the EU Secondary Repository and Router have been in operation.

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Summary of changes

Date	Version	Done by	Comment
23/09/2019	1.0	Dentsu Aegis Network	
04/10/2019	x	EC SANTE B2	Verification
11/10/2019	1.1	Dentsu Aegis Network	
14/10/2019	x	EC SANTE B2	Verification

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1 Introduction

This document describes the most common reporting mistakes observed during the first number of months of operations of the EU Secondary Repository and Router. Its main purpose is to assist **economic operators** in **reviewing** the practical aspects of their internal procedures and practices in view of ensuring their activities' full compliance with the applicable rules on tobacco traceability.

Economic Operators should review the key reporting mistakes highlighted in this document.

The presence of reporting mistakes suggests that economic operators could be at risk of not meeting their regulatory obligations under the applicable legislation¹, which may affect the compliance status of products in circulation.

During the initial months of the system's operations the following categories of data quality issues were identified:

- Master data missing or inaccurate;
- Wrong or missing event information;
- Errors in the use of events including sequencing.

[1] [Directive 2014/40/EU of the European Parliament](#) and of the Council of 3 April 2014 on the approximation of the laws, regulations and administrative provisions of the Member States concerning the manufacture, presentation and sale of tobacco and related products, OJ L 127, 29.4.2014, p. 1–38; [Commission Implementing Regulation \(EU\) 2018/574](#) of 15 December 2017 on technical standards for the establishment and operation of a traceability system for tobacco products, OJ L 96, 16.4.2018, p. 7–55.

2 Master data

The registries (master data) compiled by ID issuers and sent to the Secondary Repository, containing information on economic operators, facilities and machines, should be up-to-date and complete. They should contain information on all the economic operators, facilities and machines operating in the EU tobacco track and trace system and related mandatory information.

Cases of missing or incomplete data have been observed.

Economic operators, facilities, machines missing in the registries

Problem

When EOID/FID/MID are absent because the economic operators/facilities/machines have not been registered with the ID Issuer, the distribution will attempt to send messages with "UNKNOWN" or self-generated EOIDS/FIDs/MIDs.

Impact

These data gaps create inconsistencies in the reporting resulting in codes being generated that cannot be linked to registered data.

Action needed

Economic Operators should review and, if needed, correct the EOID, FID, MID information reported to the ID Issuer. Ensure that all economic operators/facilities/machines under their perview are registered.

Incomplete or missing addresses

Problem

Economic operators sometimes/regularly enter addresses in the registries with incomplete (e.g. city missing) or missing (e.g. empty field) information.

Impact

Economic Operator, Facility or Machines cannot be clearly identified.

Action needed

Economic Operators should review and, if needed, correct the address information.

NB. As part of the proposed changes to the Data Dictionary and the List of Specifications 1.3, the address field will be split and an additional validation will be implemented. As a part of this upgrade, ID Issuers may ask Economic Operators to reconfirm their reported addresses.

Non-Romanised characters

Problem

Non-Romanised characters being used in mandatory text fields. These fields should conform to the ISO8859-15:1999 character set, that is only use the Latin (Roman)s alphabet.

The implementing regulation¹ requires that text fields be completed with characters from the Romanised alphabet.

The address and name fields are some of the fields most affected.

Impact

Economic Operators do not comply with their obligation to request identifier codes in line with the applicable rules¹.

Action needed

Economic Operators should review and, if needed, correct the address and text information according to the List of Specifications².

[1] [Commission Implementing Regulation \(EU\) 2018/574](#) of 15 December 2017 on technical standards for the establishment and operation of a traceability system for tobacco products

[2] [Data Dictionary 1.2](#) Data Type definition section 2.1

3 Event data

Economic Operators report events to the Router and the Secondary Repository. Often there are mistakes in the information contained in the events. The most common mistakes are highlighted below.

Wrong UI codes capture

Problem

Economic Operators report messages containing a list of UIs that are not recognised by the Secondary Repository because the UIs in question are transmitted in the wrong format (e.g use of SGTIN format/codes where data qualifiers have not been removed).

Impact

Messages containing such codes are accepted on a temporary basis but trigger a transition period warning.¹

UIs reported in an incorrect format cannot be linked to UIs recorded in the Secondary Repository, leading to breaks in the traceability chain.

Misreporting of this nature renders affected products non-compliant with the TPD and as such they could be seized by the competent authorities.

Examples

A SSCC wrongly reported as (00)740088XXXX365372 containing the application identifier (00) should be reported as 740088XXXX365372

A GS1 SGTIN aUI
01038XXXX587097214017XXXX170206324014382922
containing the application identifiers (01), (21) and (240) should be reported as 038XXXX5870974017XXXX1702063

Action needed

Economic Operators should review and, if needed, correct the format of the UI captured and transmitted to the Router and Secondary Repository according to the List of Specifications. Economic Operators must assess whether a UI benefits from the transitional period rules.

[1] The transition period extends from 20 May 2019 to 20 May 2020. During the transition period, Economic Operators can report pre-TPD unique identifiers. Pre-TPD unique identifiers should be removed from events and processed by the traceability system.

Human readable UI mismatch

Problem

Economic Operators reports a human readable UI during the application event (EUA 3.1 message) that does not match the information printed on the packs.

Impact

Incorrect information reported.

Inconsistent information in the Secondary Repository.

Misreporting of this nature renders affected products non-compliant with the TPD and as such they could be seized by the competent authorities.

Example

Information printed on the pack:



XXXX5fSBFcW2F

Information reported by the Manufacturer to the Secondary Repository:

```
[
  {
    "id": " XXXX5fSBFcW2FQdXX19061507",
    "shortIdentifier": " XXXX5fSBFcW2FQdXX",
    "humanReadableIdentifier": " XXXX5fSBFcW2FQdXX",
    "clientId": "XXXX9a7epn5a2hn4tg5ai4rI",
    "deploymentType": 2
  }
]
```

The human readable code printed on the pack is XXXX5fSBFcW2F while the code declared in the application message (3.1) is XXXX5fSBFcW2FQdXX.

Action needed

Economic Operators should review and, if needed, correct the human readable information.

Wrong TP_ID **Problem**

Economic Operators when requesting unique identifiers for products intended for the EU market refer to an incorrect TP_ID, e.g. "00000-00-00000" (in IRU - 2.1 messages).

Impact

Incorrect information reported.

Inconsistent information in the Secondary Repository.

Misreporting of this nature renders affected products non-compliant with the TPD and as such they could be seized by the competent authorities.

Action needed

Economic Operators should review and, if needed, correct the TP_ID information.

Corrupt link between aggregated and subordinate UIs

Problem

Economic Operators report the link between the aggregated UI and the subordinate UIs incorrectly by listing the aggregated UI in the same list as the subordinate UIs.

Impact

The aggregated information is inaccurate, as at least one of the subordinate UIs cannot be recorded.

Misreporting of this nature renders affected products non-compliant with the TPD and as such they could be seized by the competent authorities.

Example

```
{
  "F_ID": "XXXU10s8KO",
  "aUI": "XXX5684901748819",
  "Aggregation_Type": 2,
  "Aggregated_UIs1": null,
  "Aggregated_UIs2": ["XXX5684901748819", ...],
  "aUI_comment": null,
  "Event_Time": "19071612",
  "EO_ID": "XXXU1ZnFQk",
  "Code": "xxxxxxx-00cf-5724-9a71-0dd19dc1fe50_xxxxxt",
  "Message_Type": "EPA",
  "Signature": {"Origin": 1, "Scopes": [2, ...]}
}
```

Event Time "yyMMddHH" format

Action needed

Economic Operators should review the system that reports the aggregation events (3.2) and correct the aggregated and subordinate UIs information as necessary.

Problem

The time of an event, as indicated in each message, must be reported in the format "yyMMddHH". Some Economic Operators do not follow this prescribed format.

Impact

Failure to use the correct format leads to the event time recorded in the Secondary Repository not reflecting the actual event time for the corresponding message. This leads to misreporting.

Misreporting of this nature renders affected products non-compliant with the TPD and as such they could be seized by the competent authorities.

Example

```
{ "Payment_Date":"2019-07-24", "Payment_Type":4, "Payment_Amount":281950.7,
.....,
"Event_Time":"30011017",
"EO_ID":"XXXXAA2ZMM61",
"Code":"xxxxxxx-4920-5cff-b3cc-2e6c3783ecd6_6b2j9a7epn5a2hn4tg5ai4r",
"Message_Type":"EPR"
```

This event will have an event date of 10 January 1930.

Action needed

Economic Operators should review and, if needed, correct the Event_Time information.

4 Event transmission

Economic Operators report events to the Router and the Secondary Repository. A number of common mistakes during such reporting have been observed, as described below.

Events not reported

Problem
The reporting of the application event (EUA – 3.1 message) is not reported by the Economic Operator prior to the aggregation event (EPA – 3.2 message).
A dispatch event (EDP – 3.3 message) is not reported by the Economic Operator prior to the arrival event (ERP – 3.4 message).

Impact

- If the application of the UI is not recorded in the Secondary Repository, any supply-chain event reported thereafter will generate a transition warning 299 response. This warning means that the UI has been excluded from the main reports.
- The sequence of the reporting of messages is not compliant with the legislation. This renders the product non-compliant and the competent authorities can seize it.

Action needed

Economic Operators should ensure that all events are reported in the order of occurrence. They should review and, if needed, correct the reporting of the event mechanism to ensure that events are transmitted to the Router and Secondary Repository in a timely manner without buffering.

Multiple Aggregation Events on the same UI

Problem
Economic Operators report multiple aggregation events (EPA – 3.2 message) with the same parent UI without reporting any disaggregation events (3.6 message).

Impact

- The reuse of a self-generated aggregated level UI requires that the subsequent aggregation event is preceded by a disaggregation event.
- Misreporting of this nature renders affected products non-compliant with the TPD and as such they could be seized by the competent authorities.

Action needed

Economic Operators must report a disaggregation event when reusing a self-generated aggregation-level UI. It is not permitted to reuse aggregated UIs delivered by a national ID issuer.

Incorrect Event sequence transmission

Problem

Economic Operators report product movements in the wrong order. For example, arrival events (ERP – 3.4 message or EVR – 3.7 message) are reported prior to the related dispatch events (EDP – 3.3 message).

Impact

Economic Operators do not comply with their duty to transmit the events in order of their occurrence as defined in Article 34 (1) of the Commission Implementing Regulation (EU) 2018/574 of 15 December 2017.

Action needed

Economic Operators should ensure that all events are reported in the order of occurrence. They should also validate that their systems are processing and transmitting the events in the sequence of processing.

Timing of message transmission

Problem

Economic Operators report events outside of the time window defined in the legislation.

Impact

Economic Operators do not comply with their duty to transmit the events in the order of their occurrence as defined in the legislation.

Action needed

Economic Operators should validate that their systems are processing and transmitting the events in line with the time window defined in the legislation.

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