EU Tracking and Tracing System for tobacco products

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<th>Date</th>
<th>13-nov-2017</th>
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<tr>
<td>Subject</td>
<td>Comments on EU Tracking and Tracing System for tobacco products</td>
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**Description**

Overall evaluation

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This is my overall evaluation for the new EU system for traceability and security features in the field of tobacco products. It is based on the TTIS Final Report First Draft Main Report v01 and related to the IT artefacts of the system, the physical security features and anti-tampering devices of the system and the Model Contract is outside my area of expertise.

**Overall evaluation**

Without having in-depth knowledge of the tobacco industry, my overall impression of the system regarding the software architecture is that the high level design looks complete and solid, with extensive use cases and it is well thought out. The canonical data model, data flow diagrams and business processes, messaging structure, functionalities and features do not look complex overall.

It is a huge project spanning 28 Member States, multiple systems and solution providers and an ambitious roadmap. There are challenges in designing and implementing datastores and message brokers that can handle massive amounts of data and messages throughput.
The roadmap for the technological roll-out is scheduled for beginning of 2018 and a production implementation of May 2019.

“The main assumption is that all the legislative work will be finalised by the end of December 2017, so that the technical roll-out can effectively begin in the beginning of 2018 — Main Report p35”

I assume after all the legislative work is finalised this one main milestone for the technical roll-out will be expanded into more detailed milestones and tasks. I have no information on how the approach will be regarding the technical implementations by the different providers.

A list of some high level tasks includes (in no particular order):

- Selecting/approving surveillance storage provider
- Selecting/approving ID issuer solution providers
- Selecting/approving Primary Data Storage providers
- Selecting external auditors
- Selecting anti-tampering/security features
- Technical implementation for each system (hardware/software)
- Changes to be made to internal systems
- Testing
  - Local tests
  - Integration tests
  - Security tests
  - Audit tests
The Surveillance Storage provider plays a central role in the whole system and selected/proposed by the Primary Data Storage Providers:

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<th>Surveillance Storage</th>
<th>Providers of Primary Data Storage</th>
<th>Surveillance Data Storage</th>
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<td>As required by art. 15.9 of the TPD, the European Commission must approve the suitability, independence and technical capabilities, as well as the contract, of the third party providing the Primary Data Storage.</td>
<td>Contracted jointly by the primary data storage providers, with the costs of the Surveillance Data Storage charged to the manufacturers and importers.</td>
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How will this selection/proposal procedure take place? "Manufacturers and importers shall propose the providers of the Primary Data Storage." Implies the Surveillance Storage provider will be selected after (all?) Primary Data Storage provider(s) are selected and approved by the European Commission.

The time frame for the selection criteria for all the different providers in the Member States is unknown and could potentially take weeks or months which of course decreases the time left for development.

Many systems and parties in different countries are involved. A strong project management team that leads this project is crucial for the success of the system. Therefore this is an important advise:

“For all these reasons, it is advised to establish a strong governance that can oversee the System in the short, medium and long term; and also to ensure the constant evolution of the System to guarantee its effectiveness in fighting illicit trade. This governance must be achieved by clearly allocating the responsibilities of the management and implementation of the System to the different actors. – Draft Main Report p36”

As I have previously mentioned a technical platform for solution providers could be helpful for sharing knowledge on functional and technical issues during development to speed up development. That is of course if providers want this. In case of competition between vendors that do not want to share technical information this has no added value. E.g. it does have value where two providers of systems have input/output data that relates to another system of another provider (in another country).

“…. Several ID Issuer solutions can be established by independent third parties in order to promote fair and open competition at EU level… - Draft Main eport p56”
Although the delivery time frame to implement the system by May 2019 seem very ambitious I do think it is possible with a strong project management team to deliver it in time.