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Cc: [redacted]
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Categories: Registered

Thank you for the opportunity to participate in the workshop of May 15th.
Attached we are sending you our additional input following the interesting discussions during the workshop.
We consider this contribution as Confidential Business Information with the Commission and its consultants.
It would be helpful to be able to have a further discussion with the Commission and its consultants which would enable us to provide commercially sensitive background information.

Kind regards,

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POSITION PAPER ON THE IMPLEMENTATION OF ART 15 AND 16 OF THE EU TOBACCO PRODUCTS DIRECTIVE

INTRODUCTION

Honeywell offers a comprehensive range of globally well-tested technologies that will enable an effective and robust implementation of the Traceability and Authentication requirements under the EU Tobacco Products Directive (2014/40/EU).

Building on this expertise, this paper expresses Honeywell's views and recommendations regarding the technical standards that the Commission is considering to adopt for the implementation of these requirements as discussed in the Stakeholder consultation of May 15th, 2017.

As a preliminary remark, it should be noted that the discussion at the Stakeholder Consultation focused predominantly on the various technical and administrative possibilities for compliance with the Tobacco Products Directive. In effect, less attention was given to the formulation of the actual standards that may be considered. We recommend that any technology provider that supplies products and services carries adequate certification to ensure compliance with the requirements of the Tobacco Products Directive, e.g. ISO/IEC 19987:2015 EPCIS, 2016.

In general, we would favour an approach that is technology neutral, setting clear performance objectives/targets. As was noted repeatedly during the Stakeholder Consultation, this area is experiencing substantial innovation which would suffer significantly from "technology lock-in/lock-out". We also would strongly advocate to maintain the maximum level of flexibility to the individual operators, which would encourage innovation and competition.

TRACEABILITY – FORM AND ISSUANCE OF THE UNIQUE IDENTIFYERS (UIs)

We fully support the proposed approach of appointing third party issuers of the UIs. However, we would recommend that the UI generation be linked directly to or be part of the Decentralised Data Stores. As each Decentralised Data Stores will provide T&T processing capability for the manufacturers/importers and the Logistics chain, it would be more practical to directly integrate UI generation. This will ensure faster overall processing and reporting, reduce total implementation time whilst retaining supplier competition, ensure direct secure association between supple chain events and UI usage and reduces possible points of failure.

With regard to the UIs we would recommend the use of GS1 standards wherever possible. However, we recognise the specific requirements of the TPD in terms of UI structure, and therefore, would focus our recommendation on using SSCC (Serial Shipping Container Code) for the identification and tracking of pallets. SSCC is an universally accepted coding standard ("licence plate") used across logistics chains globally and if adopted would minimize impacts on many of the economic operators in the tobacco logistics chain. Use of SSCC would also more easily enable the use of ASNs (Advance Shipment Notice) which can be readily used to send T&T aggregation data associated with a physical shipment (pallet) between economic operators.

TRACEABILITY – RECORDING AND TRANSMITTING OF DATA

We agree with the proposed use of a single or limited number of messaging protocols, e.g. XML and JSON. Ideally this should be secured by encrypting messages in transit by using HTTPS connections, supported by a Public Key Infrastructure (PKI) system.

In our view data sharing between all parties should be based on EPCIS V1.2 and the associated data stores should be EPCIS compliant. EPCIS extensions would enable the additional data required by the TPD to be easily included as part of the data transmission.

We would recommend that the proposed approach of establishing local Buffers is extended to include the ability to enable local compliance checks between the physical shipment of goods and the associated track and trace data capture. For instance, 20 shipping cases must be shipped as part of a delivery order, the local Buffer should provide a compliance check functionality ensuring that the 20 shipping cases have been scanned for track and trace purposes prior to shipping.

It is our view that cloud computing, with servers based in the EU, will provide the most robust and easy to implement technology to meet the requirements of the TPD. Cloud computing is typically based on big data technologies and is fundamentally suited to integrating multiple actors, geographic locations and systems.

TRACEABILITY – PROCESSING, STORAGE AND ACCESS

We would recommend that, as stated previously, the UI generation and Decentralised Repositories are integrated thereby simplifying the overall processing requirements of the end to end T&T solution. The Decentralised repositories could provide near real time processing capability to all actors in the logistics chain, whilst establishing single direct links to the Common Data Repository and Router respectively. This would simplify the overall architecture, reduce points of failure and increase speed of implementation and processing.

In support of the recommendation above, we would propose that the Router can manage requests for UIs from the logistics chain and the subsequent distribution of generated UIs.

We would strongly recommend that detailed analysis is undertaken by the Commission on how to manage shipping cases and pallets that contain a mix of manufacturer/importer products. In particular routing only relevant UIs to the correct Decentralised Repository.

TRACEABILITY – DATA CARRIERS

We fully support the Commission's approach to using a limited number of recognized standards based data carriers. This will reduce implementation timelines and ease adoption throughout the tobacco manufacturing and logistics chain.

SECURITY FEATURE(S)

We strongly support the proposed approach in which the security features can be either affixed to or embedded ("printed") in the package itself. Both the packaging and the tax stamp could act as the carrier of the security features, using both visible and covert technologies.

The Consultants' report confirms that the list of technologies is "work in progress" and that a wide diversity of technologies is available. It is therefore important that the nature of security feature should be as wide as possible. Consequently we suggest to amend the title of the proposed chapter 8 of the Consultant's report to "Technical specifications for the security features" in order to avoid an implied preference for digital security features, which may be more vulnerable to abuse than some other covert technologies (e.g. taggants).

The best defence against abuse (forgery) of the security features is a frequent rotation of the security features used which can be linked to the Unique Identifier.

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