

Annex 1. MS position on extension of scope of UI/ATD

Member State		Unique Identifier		Anti-Tampering Device			
		White List	Reimbursement	ATD on OTC	ATD removal from OTC	ATD on whitelist MP	Under discussion and considering extending the scope of ATD
Austria	AT	No	Not yet decided	Yes, voluntary	No	Yes, voluntary	-
Belgium	BE	Yes, if reimbursed	Yes	Yes, voluntary	No	Yes, voluntary	-
Bulgaria	BG	No	No	Yes, voluntary	No	Yes, voluntary	-
Cyprus	CY	Yes, following approval on a case by case basis	Yes, following approval on a case by case basis	Yes, voluntary	Yes, voluntary	Yes, voluntary	-
Czech Republic	CZ	No	No	Yes, voluntary	No	No	
Germany	DE	No	No	Yes, voluntary	No	Yes, voluntary	-
Denmark	DK	No	No	Yes, voluntary	No	Yes, voluntary	-
Estonia	EE	No	No	Yes, voluntary	No	Yes, voluntary	-
Greece	EL	Longer transition	Longer transition	Longer transition	Longer transition	Longer transition	Greece has an additional six year transition
Spain	ES	Yes, if reimbursed	Yes	Yes, voluntary (risk based)	No	Yes, voluntary (risk based)	NCA may request its inclusion for safety reasons
Finland	FI	No	No	Yes, voluntary	No	Yes, voluntary	-
France	FR	No	No	Yes	No	Yes, voluntary	-
Croatia	HR	No	No	Yes, voluntary	No	Yes, voluntary	-
Hungary	HU	No	No	Yes, voluntary	No	Yes, voluntary	-
Iceland	IS						
Ireland	IE	No	No	Yes, voluntary	No	Yes, voluntary	-
Italy	IT	Longer transition	Longer transition	Longer transition	Longer transition	Longer transition	Italy has an additional six year transition
Liechtenstein	LI						
Lithuania	LT	No	No	Yes, voluntary	No	Yes, voluntary	
Luxembourg	LU	Yes, following MoH approval	No	Yes, following MoH approval	No	Yes, following MoH approval	
Latvia	LV	No	No	Yes, voluntary	No	Yes, voluntary	-
Malta	MT	No	No	Yes, voluntary	No	Yes, voluntary	
Netherlands	NL	No	No	Yes, voluntary	No	Yes, voluntary	-
Norway	NO	No	No	Yes, voluntary	No	Yes, voluntary	-
Poland	PL	No	No	Yes, voluntary	No	No	-
Portugal	PT	Yes, if reimbursed	Yes	Yes, voluntary	No	Yes, voluntary	-
Romania	RO	No (to be confirmed, national legislation under approval process)	No (to be confirmed, national legislation under approval process)	Yes (to be confirmed, national legislation under approval process)	No	Under discussion	Considering extending the scope of the ATD
Sweden	SE	No	No	Yes, voluntary	No	Yes, voluntary	-
Slovenia	SI	Under discussion	Under discussion	Yes, voluntary	No	Yes, voluntary	-
Slovakia	SK	No	No	Yes, voluntary	No	Yes, voluntary	-
United Kingdom	UK	No	No	Yes, voluntary	No	Yes, voluntary	-