

Table 2: MS coding requirements

Member State		Product Code (PC)		National Health Reimbursement Number (NHRN)					Timing	Conclusion	
		GTIN	Other	On pack	In Product Code	Human readable	In UI	Use system look-up	Formal confirmation by Health Authority	Overview human readable	Number of elements in 2D barcode
<i>Austria – SMP</i> ⁽¹⁾	AT	No	NTIN with PZN embedded	No	Yes (NTIN with PZN embedded)	No	No	No	Not known yet	4 lines: no GTIN	4
<i>Austria– MMP</i> ⁽¹⁾	AT	Yes	NTIN with PZN embedded (if compatible with other markets)	No	No, in case of GTIN	No	No	Yes	Not known yet	4 lines: GTIN	4
<i>Belgium</i> ⁽²⁾	BE	Yes		No	No	No	No	Yes	Not known yet	4 lines: GTIN	4
<i>Bulgaria</i>	BG	Yes		No	No	No	No	No		4 lines: GTIN	4
<i>Croatia</i>	HR	Yes		No	No	No	No	No		4 lines: GTIN	4
<i>Cyprus</i>	CY	Yes		No	No	No	No	No		4 lines: GTIN	4
<i>Czech Republic</i>	CZ	Yes		Yes	No	No	No	No	Amendment bill under development	4 lines: GTIN	4
<i>Denmark</i> ⁽³⁾	DK	Yes	NTIN with Vnr embedded	No	No	No	No	No	Confirmed by authorities	4 lines: GTIN 4 lines: no GTIN	4
<i>Estonia</i>	EE	Yes		No	No	No	No	No	As published in OJ on 09.02.2016	4 lines: GTIN	4
<i>Finland</i> ⁽³⁾	FI	Yes	NTIN with Vnr embedded	No	No	No	No	No	TBD	TBD	Most likely 4

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<i>France</i> ⁽⁴⁾	FR	Maybe on MMP	NTIN with CIP embedded	Yes	Yes	Yes (CIP mandatory on the pack)	No	No	Q4/2017	4 lines: no GTIN	4
<i>Germany- SMP</i> ⁽¹⁾	DE	No	NTIN or PPN (PZN embedded in both)	Yes	Yes (NTIN or PPN with PZN embedded)	Yes	No	No		4 lines: no GTIN	4
<i>Germany- MMP</i> ⁽¹⁾	DE	Yes	PPN (PZN embedded)	Yes	No, in case of GTIN Yes, in case of PPN	Yes	Yes, in case of GTIN No, in case of PPN	No		5 lines: GTIN + NHRN	5
<i>Greece</i> ⁽⁵⁾	EL	No	NTIN								
<i>Hungary</i>	HU	Yes		No	No	No	No	No		4 lines: GTIN	4
<i>Iceland</i> ⁽³⁾	IS	Yes	NTIN with Vnr embedded	No	No	No	No	No	TBD	TBD	Most likely 4
<i>Ireland</i>	IE	Yes		No	No	No	No	No		4 lines: GTIN	4
<i>Italy</i>	IT		Bollino								
<i>Liechtenstein</i> ⁽¹⁰⁾	LI	Yes	NTIN (EAN 13) with embedded Swissmedic registration number	No	No	No	No	No	Regulation of TPA Art. 17 is expected for 2019	4 lines: GTIN or NTIN	4
<i>Latvia</i>	LV	Yes		No	No	No	No	No		4 lines: GTIN	4
<i>Lithuania</i> ⁽⁶⁾	LT	Yes		No	No	No	No	No	Expected 2018	4 lines: GTIN	4

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<i>Luxembourg</i> ⁽⁷⁾	LU	Depending on country of origin		No	No	No	No	Yes		Depending on country of origin	
<i>Malta</i>	MT	Yes		No	No	No	No	No		4 lines: GTIN	4
<i>Netherlands</i>	NL	Yes		No	No	No	No	No		4 lines: GTIN	4
<i>Norway</i> ⁽³⁾	NO	Yes	NTIN with Vnr embedded	No	No	No	No	No	TBD	TBD	Most likely 4
<i>Poland</i>	PL	Yes		No	No	No	No	No	TBD	4 lines: GTIN	4
<i>Portugal</i> ⁽⁸⁾	PT	Yes		Yes	No	Yes	Yes	No	Confirmed by informative note by INFARMED published in September (legislation on final stages of discussion, sent to stakeholders for comments)	5 lines: GTIN + NHRN	5
<i>Romania</i>	RO	Yes		No	No	No	No	No		4 lines: GTIN	4
<i>Slovakia</i>	SK	Yes		No	No	No	No	No		4 lines: GTIN	4
<i>Slovenia</i>	SI	Yes		No	No	No	No	No	Confirmed by authorities	4 lines: GTIN	4
<i>Spain</i> ⁽⁹⁾	ES	Yes	NTIN (EAN13 with NHRN embedded)	Yes	Yes if a NTIN is used. If a GTIN is used, NHRN is included as 5th element of the 2D barcode	Yes (pre-printed by law on the upper right-hand corner on the front of the box, not close to the barcode)	Yes, if a GTIN is used	No	Informative Note of the AEMPS (published in July 2017)	Either 4 lines (NTIN as PC) or 5 lines (GTIN + NHRN)	Either 4 lines (NTIN as PC) or 5 lines (GTIN + NHRN)

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Sweden	SE	Yes	NTIN with Vnr embedded	No	No	No	No	No		4 lines: GTIN 4 lines: no GTIN	4
Switzerland ⁽¹⁰⁾	CH	Yes	NTIN (EAN 13) with embedded Swissmedic registration number	No	No	No	No	No	Regulation of TPA, Art. 17a is expected for 2019	4 lines: GTIN or NTIN	4
UK	UK	Yes		No	No	No	No	Yes	To be finalised by Q3/2017	4 lines: GTIN	4

(1) SMP: Single Market Pack; MMP: Multi-Market Pack.

(2) Belgium currently uses the CNK-code as Product Code and as NHRN but the decision has been taken to switch to a GTIN product code with look-up tables for finding the corresponding CNK-code.

(3) Denmark, Finland, Iceland, Norway, Sweden: GTIN for new products and NTIN for existing products (termination date for new NITNs is set on 09/02/2019). The Vnr is not used as a NHRN and shall not be uploaded to the EU Hub as a National Code in the Market Specific Data. The Vnr is not affected by e-verification. It is an old system which still is used but for other purposes. Whether a company will use a unique NTIN or a GTIN for e-verification doesn't matter. It is only important that the code is unique. The current NTIN can only be retained if it is unique to the pack (not always the case today in Sweden). In the NTIN, the Vnr is embedded but that is not at any significance for e-verification. If a company change to GTIN as the unique product code, there is no impact on the Vnr, it can be kept (and is printed on the pack) but of course it can never be embedded in the GTIN.

(4) France: Use of GTIN on multi market packs and look-up under discussion.

(5) Greece: under discussion by Greek authorities: according to latest intelligence they are likely to opt for GTIN with no inclusion of the national reimbursement number.

(6) Lithuania: In order to implement the requirements of the DR, the draft amendments to the Law on Pharmacy were prepared a public consultation was held until 15 September 2017. The draft should now be submitted to the Lithuanian government and Parliament.

(7) Luxembourg: Luxembourg currently uses the PZN as Product Code for products originating from Germany and the CIF-CIP as Product Code for products originating from France; it will use GITN for products originating from Belgium.

(8) Portugal: The stakeholders have decided to adopt the GTIN (not imposed by INFARMED). The NHRN is already printed on the packaging in human readable format as it is the national marketing authorization number and is also used for reimbursement.

(9) Spain: the Spanish Medicines Agency wants to have the National Health Reimbursement Number included in the data matrix. The NHRN is a 6 digit number plus a control digit. It is embedded in EAN13 code (847000 + NHRN+ CD). The NHRN must also be printed on the upper right-hand corner on the front of the box, not close to the bar code by law.

(10) Switzerland and Liechtenstein apply both the Swiss TPA. The new TPA Art. 17a allows Swiss Stakeholders to implement and use the same security features as foreseen by the EU Delegate Regulation 2016/161 on a voluntary base.