

Overview of coding requirements - Update 11 September 2017

Country	Product Code		National Health Reimbursement Number					Timing	Conclusion Human readable			Conclusion 2D barcode		
	Use GTIN as Product Code (PC)	PC no GTIN but...	Required on pack ?	Embedded in PC?	Required as Human readable?	Required as 5th element in 2D Barcode?	Use System look up to access NHRN		When will regulations be formally confirmed by Health Authority ?	4 lines GTIN	4 lines no GTIN	4 lines GTIN + NHRN	4 elements	5 elements
Austria - SMP (1)	No	NTIN with PZN embedded	No	Yes (NTIN with PZN embedded)	No	No	No	Not known yet	No	Yes	No	Yes	No	
Austria - MMP	Yes	or NTIN with PZN embedded (if compatible with other markets)	No	No, in case of GTIN	No	No	Yes	Not known yet	Yes	No	No	Yes	No	
Belgium (2)	Yes	N.A.	No	No	No	No	Yes	Not known yet	Yes	No	No	Yes	No	
Bulgaria	Yes	N.A.	No	No	No	No	No		Yes	No	No	Yes	No	
Croatia	Yes	N.A.	No	No	No	No	No		Yes	No	No	Yes	No	
Cyprus	Yes	N.A.	No	No	No	No	No		Yes	No	No	Yes	No	
Czech Republic	Yes	N.A.	No	No	No	No	No		Yes	No	No	Yes	No	
Denmark (3)	Yes	NTIN with Vnr embedded	No	No	No	No	No	tbd	tbd	tbd	No	Yes	Not likely	
Estonia	Yes	N.A.	No	No	No	No	No	As published in OJ on 09.02.2016	Yes	No	No	Yes	No	
Finland (3)	Yes	NTIN with Vnr embedded	No	No	No	No	No	tbd	Yes	Yes	No	Yes	No	
France	No	NTIN with CIP embedded	Yes	Yes	mandatory on the pack)	No	No	Q1/2017?	No	Yes	No	Yes	No	Use of GTIN + look up under discussion
Germany - SMP	No	NTIN or PPN (PZN embedded in both)	Yes	Yes (NTIN or PPN with PZN embedded)	Yes	No	No	tbd in Q4/2017 ?	No	Yes	No	Yes	No	
Germany - MMP	Yes	or PPN (with 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	tbd in Q4/2017 ?	No	No	Yes	No	Yes	
Greece (4)	No	NTIN												
Hungary	Yes	N.A.	No	No	No	No	No		Yes	No	No	Yes	No	
Iceland (3)	Yes	NTIN with Vnr embedded	No	No	No	No	No	tbd	tbd	tbd	No	Yes	Not likely	
Ireland	Yes	N.A.	No	No	No	No	No		Yes	No	No	Yes	No	
Italy		Bollino												
Liechtenstein														
Latvia	Yes	N.A.	No	No	No	No	No		Yes	No	No	Yes	No	
Lithuania	Yes	N.A.	No	No	No	No	No		Yes	No	No	Yes	No	
Luxembourg (5)	Depending on country of origin		No	No	No	No	Yes	Q1/2017 (tbc)	Depending on country of origin					
Malta	Yes	N.A.	No	No	No	No	No		Yes	No	No	Yes	No	
Netherlands	Yes	N.A.	No	No	No	No	No		Yes	No	No	Yes	No	
Norway (3)	Yes	NTIN with Vnr embedded	No	No	No	No	No	tbd	tbd	tbd	No	Yes	Not likely	
Poland	Yes	N.A.	No	No	No	No	No	tbd	Yes	No	No	Yes	No	
Portugal (6)	Yes	N.A.	Yes	Yes	Yes	Yes	No	To be approved Sept 2017	No	No	Yes	No	Yes	
Romania	Yes	N.A.	No	No	No	No	No		Yes	No	No	Yes	No	
Slovakia	Yes	N.A.	No	No	No	No	No		Yes	No	No	Yes	No	
Slovenia	Yes	N.A.	No	No	No	No	No	Confirmed by authorities	Yes	No	No	Yes	No	
Spain (7)	No	NTIN (EAN13)	Yes	Yes (NHRN: 6 digits number + Control digit. Embedded in EAN13 code (847000 + NHRN+ CD))	Yes (pre-printed by law on the upper right-hand corner on the front of the box, not close to the 2D bar code in all cases (two available options: 1) embedded in PC and 2) as 5th element)	To be required in the 2D bar code in all cases (two available options: 1) embedded in PC and 2) as 5th element)	No	Ministerial Order under elaboration (expected to be released in Q2/2017)	No	Yes (option 1: NTIN as Product Code)	Yes (Option 2: NHRN included as 5th line)	Yes (if NHRN is embedded in NTIN, see option 1)	Yes (if NHRN is placed as 5th element)	
Sweden	Yes	NTIN with Vnr embedded	No	No	No	No	No		Yes	Yes	No	Yes	No	
Switzerland	Yes	NTIN												
UK	Yes	N.A.	No	No	No	No	Yes	Q3/2017	Yes	No	No	Yes	No	

Yet to be completed and validated by relevant country associations

N.A.: Not Applicable

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

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

(5) 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..

(6) Portugal: according to information contained in INFARMED circular of 29 August 2017

(7) Spain: the Spanish Medicines Agency wants to have the National Health Reimbursement Number to be included in the data matrix.