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TRACKING

Dentsu International

EU SECONDARY REPOSITORY QUESTIONS AND ANSWERS RECEIVED FROM STAKEHOLDERS BEFORE THE RELEASE OF THE 2.0 FINAL SPECIFICATIONS AND DATA DICTIONARY

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1. Introduction

1.1 Purpose of the document

This document presents the most relevant questions that were received during the consultation phase after the release of the draft List of Specifications 2.0 and draft Data Dictionary 2.0 on August 21, 2022.

The consultation phase lasted until September 15, 2022.

Questions and answers have been sorted by the general topic they address.

Note: Any new questions raised after the release of this document will not be added to the document as its purpose is to present questions raised during the consultation phase.

2. Questions regarding the transition from 1.4.6 to 2.0.0, grace periods, and testing environments

Question	Answer
The latest date for compliance is 21st December 2023, which is just before the Christmas and New Year holiday date for a technical cut-over. Can Dentsu allow for an extended overlap period – either allow transactions with the new standard to be sent 2-4 weeks before that date or continue to allow transactions matching the old standard for another month?	The date is set by regulation and Dentsu does not have the capacity to change the date. After raising this topic to DG Santé, they have specified that no grace period is foreseen for the new regulation. As for a transition period accepting both types of messages, it's the same issue, we need to raise the matter to the authorities as the change in message format is by regulation on a specific date.
Could you please confirm if primary will also need to disable the transition and grace period validations for UIs during the years 2019 and 2020?	No, the Primary Repository, Secondary Repository, and Router will still treat UIDs during the years 2019 and 2020 like today.
Is there any provision for a grace period or any cutover approach for field changes in EDP 3-3, EIV 4-1, and EPR 4-3 messages?	There will be a hard switch between the old version of the messages with the new version of the messages. Details on the cut-over will be shared at a later stage via Service Now communication.
We can see that the new specifications have formally removed the "transition period validation" that was put in place to support the legal process of continuing to sell products produced before May 2019 for a period of 1 year. This "Transition Period Validation" was the technical solution to match the law in this respect. For the May 2024 introduction of OTP, we have a legal 2-year period to continue selling OTP products produced before 20 May 2024, however, there is no technical validation solution in place as of May 2019. Why do we not have a technical solution in place for OTP 2024 that aligns with the legislation, as we did at the start of TPD 2019? Relying purely on operators to identify pre-May 2024 stock vs. post-May 2024 stock is very complicated and will result in a significant amount of errors.	After consulting this point with DG Santé, they've stated that the previous adaptation that lasted until 31 August 2020 was an exception, and under the new regulation, it cannot be legally justified to reintroduce this mechanic.

In the specifications version 2.0, a distributor who is in possession of the products will need to report product movements along with their identifier codes (EOID/FID) to the Router. This is the opposite of the previous specifications for third-party logistics companies, where it was explicitly requested to report via the manufacturer's primary. This is a big and significant change in the way of working and systems, with implications for manufacturers trying to meet their reporting obligations. With this new way of reporting, the manufacturer loses all visibility of logistics reporting events sent to the repositories by the third-party distributors and hence will need to develop new processes and integration to separately capture these logistics events from third-party operators to allow the owners of the stock (manufacturers) to report the invoice, order, and payment events. Furthermore, the system's technical validation will cause errors when simply reporting stock from the third-party operator facility. What is the proposed mechanism to move the stock from the current manufacturer's FID to the new 3PL operator's facility? We appreciate and understand how this could have been misinterpreted or misunderstood in the past, however, historically this was a topic of debate and hence the previous versions of the specifications added technical clarity by specifying these 3rd party operators to report via the manufacturer primary. To completely overturn and change the technical solution with limited notice is risky and very time-consuming. Taking into account the wording of specification 1.4.6 vs. 2.0, is there a possibility to delay this change until the next update of the specification?	The reporting obligations are set out in the implementing regulation. After consulting this point with DG Santé, they've stated that there are no plans for any new grace period or delay mechanisms to be introduced. Please raise further concerns to the authorities.
A cutover timeline with all milestones outlined would be needed. How will this work and what will be a detailed timeline for the transition? Will there be an exact time or downtime? TODO formulate better	Exact occurrences on the cut-over will be communicated further down the line via Service Now. The current approach will be a hard cut-over with downtime.
When will the Dentsu test page be updated to the new specification and can we assume that testing with these codes is approved by Dentsu? When will this update happen and what is planned there? Will an API be available?	As of now, there are no plans to update the UI Generation Test Tool. This tool is out of the scope of Dentsu's obligations. ID Issuers are expected to provide QA systems that allow stakeholders to test the new code generation with the new format after Secondary Repository QA goes live on the 21st of October 2023. If we update the tool we will let all stakeholders know via Service Now communication.

Will there be a cutoff to using codes issued pre-2.0? Will they be accepted once 2.0 is deployed? Will there be a grace period for these codes?	There is no need for a cut-over of codes. Both pre-2.0 codes and post-2.0 codes are valid and compatible in the system, see this explanation: "The validation VAL_UI_HR_EXIST states: "It is only possible to perform this validation for codes issued after the go-live date of the v2.0 of the specifications. Therefore, this validation shall only be performed by the Primary Repositories and Secondary Repository when the IRU message contains the upUI(s) list when received from the ID Issuers, otherwise, it is not possible to perform the validation."; -> This sentence intends that the Primary Repository should be able to evaluate for each upUI(L) if the application of the validation VAL_UI_HR_EXIST applies or not. In essence, if the associated upUI(i) to the upUI(L) to be validated is issued before the 2.0 goes live, then the validation must be skipped. If, on the contrary, the associated upUI(i) of the upUI(L) to be validated is issued after go-live, then there will be an upUI(s) to which to validate against, and therefore the validation must be performed. This allows for backward compatibility on EUA (3.1) validation with older codes."
Could Dentsu allow for a grace period or any cutover approach for timestamp change from seconds to milliseconds in the Data Type Time(L) and the Message Time Long (MTL) field?	If the system receives a message time long with precision to the SECOND, then we will programmatically convert it to MILLISECOND precision (by adding 0's) and NOT reject the message.
After 21.10 we still need to be able to test the old version and to test the transition. How Dentsu will manage this? In regards to the test environments, what is the proposal for testing the functionality of a new Private repository solution if only the 2.0 infrastructure (Router, Secondary) is available in the test environments? We still need to be able to test the pre-2.0 solution since the 2.0 will not go live before 21.12. So what is the strategy from Dentsu to approach this required testing?	It is not a current regulatory requirement to maintain QA systems for the previous version of the specs. We will update the QA system to v2.0 of the specs as of the 21st of October 2023 and there will be no QA system available for previous versions at that stage. Please note that this has been the same approach since pre-May 2019. Please note also that the new QA / UAT environment applies from the 21st of December 2023 as it's when the regulation starts.
Grace period for the new IRUs. How this will be handled? How long will the IDs that have been provided in IRUs in the old format before 21.12 be accepted?	There is no grace period for the IRUs, there will be a hard cut-over from the current version to the new version. Primary Repositories are expected to be able to handle the 3.1 EUA message for old and new codes as explained in a previous section.
How will the transition be performed? what are the guidelines to correctly move from Denstu 1.4.6 to 2.0.0? Should we have to accept 2 formats, which is impossible to have 2 entire systems co-existing...? Will there be a shutdown period?	Exact occurrences on the cut-over will be communicated further down the line via Service Now. The current approach will be a hard cut-over. So there will not be any point in time where the 2 message formats will coexist.
We have heard the qualification environment will be ready by the 21st of October, will you provide endpoints and credentials for the final version? Is there any chance QA will be ready before the 21st of October?	The endpoint and credentials are the same as the existing Secondary QA environment. On the 21st of October, we will update that environment to the 2.0 version. We cannot perform this earlier.

It is possible under certain circumstances that 3PL keeps sending a message to the manufacturer PR when a 3PL acts only for this manufacturer and not on the router? In this case, 3PL may act in a similar way as a third-party IT service provider. Manufacturers need to have a better insight into their goods.	Please raise this question to the competent authorities.
It's written that paragraph §4.7.2 "Reporting EOID, FID & MID" has been rephrased but there is no paragraph 4.7.2 in the document. What is the new paragraph number?	The whole 4.7 section has been rewritten for the release version.
If there is no compatibility with the previous URL, how to manage the delivery of all components (secondary, primary, router, UID Issuer, EO IT Systems)? Do you plan a period when there is no activity in TPD since the system won't be compatible with each other? Could you explain the timeline for the delivery of each component (Primary, Secondary, Router, UID Issuer)?	There will be a hard switch between the old version of the messages with the new version of the messages. Our current approach (to be confirmed) is that we will create a downtime (the first real one since the beginning of the system) until all messages received are consumed by the system (time to be confirmed, in the range of minutes), then come up online with the new APIs. If any sender has any message not set, we will have to treat it as an exception via support. Senders could mitigate this by cascading a similar approach on their side.
Would it be possible to delay the deadline for the request for the ID Issuer to split the IRU request into different requests with a maximum of 10k codes per request (20K considering both upUI(i) and upUI(s)), which today is meant for December 21st in prod environment and October 21st in QA environment? In our case, this leads to a huge amount of work because we need to reinvent the logic that sends IRU requests to the router.	Please raise this question to the competent authorities.
Is there an agreed agenda related to the readiness of all ID Issuers so we can start testing end-to-end all the scenarios impacted by the new Amendment?	The EU Secondary Repository and Router QA system will be updated to the new version as of the 21st of October 2023, but there is no timeline provided to us by each ID Issuer.

3. Questions regarding upUIs and their format

Question	Answer
Could you please confirm if there is any change in the upUI(L) definition for version 2.0	up UI(L) format has not changed from previous versions, it's the same
Could you please confirm the message types where this new upUI(i) data type is used	upUI(i) is the format of the upUIs present in the IRU message (when codes are delivered from Router to Primary) and is the format present today. The difference is that before 2.0 the data type did not have a name, but now this name is defined in the regulation as upUI(i)
Could you please confirm if there is any change in the upUI(s) definition for version 2.0	up UI (s) from a Primary Repository point of view was only present in the EUA (3.1) message before specifications 2.0. In the EUA (3.1 Activation) message, the manufacturer transmits the upUI(L) and the "Human Readable". This human-readable is the upUI(s). The format is defined by the ID Issuer and the difference with specifications 2.0 is that now the upUI(s) are delivered as part of the IRU message from the Router to the Primary Repository, which enables the new validation of the upUI(s) in the EUA (3.1 Activation) message. As a summary: IRU will send to the Primary Repository the formats upUI(i) and upUI(s); the Manufacturer will report in EUA (3.1 Activation) the upuI(L) and upUI(s). The upUI(L) must be the upUI(i)+timestamp, and the upUI(s) reported in the EUA (3.1 Activation) must match the upUI(s) reported in the IRU.
We need some details about the notion of "Human Readable Code" (6.2) We send "ID Issuer Prefix + Serial Number + Product Code" to manufacturers or importers, but we don't know if they need this code for the "Human Readable Code" part. So, what is the pattern we need to use to communicate this "Human Readable Code"?	The Human Readable code should have been defined since 2019 in the ID Issuer specifications. ID Issuers define the Human Readable format, which may or may not contain the Product Code part in the serialized element. Please check ID Issuer specifications, which lay down what manufacturers/importers have had to follow for the previous years. The only difference now is that the Human Readable needs to be generated also by you to avoid confusion on the Manufacturer/importer side in regards to which is the Human Readable.
To send the "Human Readable Code", what is the content of the ID file expected by manufacturers or importers? Currently, we send a file that contains an array with the "ID Issuer Prefix + Serial Number + Product Code" codes	As of specifications 2.0, the ID Issuer needs to submit to the Manufacturer/Importer the 2 formats of the codes set out in the regulation: - up UI(i) => This corresponds to the existing format transmitted today, which you rightfully describe as "ID Issuer Prefix + Serial Number + Product Code" - up UI (s) => Which corresponds to the Human Readable format and it depends on how you specify it. As per the message to transmit this information to the manufacturer, it is up to you as ID Issuer to define in the ID Issuer specifications how this message should look to accommodate the new requirements.

Can you give me more information on this: Section 3.3.3.4.2 Application Validation: • Updated “upUIs” to “upUI(i)” as the new data type is more explicit. On which message this change applies? Do I understand correctly that you are no longer supporting upUIs, instead we will need to use the format upUI(i).	Not exactly. Before specifications 2.0 the format of the UIs delivered by the ID Issuers did not have a name and we decided to name it "upUIs" (not to be confused with upUI(s)). After the regulation revision has been published, the authorities have named the UIs transmitted by the ID Issuers as "upUI(i)". The only message affected by this renaming is the IRU message (which is a message not described in the regulation, but a necessary technical message to operate the system), which affects the following flows: - Generated by ID Issuers when sending newly issued UIs to the Router. ID Issuers have now to send upUI(i) (which is the same as the former upUIs) and the new upUI(s) which is the former "Human Readable". Before, ID Issuers were only transmitting upUIs (which corresponds to upUI(i)) - Transmitted by the EU Router to the Primary Repositories.
upUI(s) = human readable and if so how the upUIh field is playing into this?	upUI(i) = Pre 2.0 format of the codes inside the IRU message. This format did not have a name before and due to the revised regulation, now it does; upUI(s) = Human Redable. Depending on the ID Issuer specifications, this format MAY or MAY NOT be the same as the up UI(i) (in particular, it depends if the serialized element contains the product code or not); upUI(L) = upUI(i)+Timestamp; Please note that NO NEW FORMAT has been introduced, just that in the revision we have a clearly defined name for a format that has been in the system since the beginning.
Could you confirm that the 2 sets of codes provided by an ID Issuer differ only in format (e.g. to include ProductCode as part of the HR) or if they can also differ in SNs?	The 2 lists replied to will be the upUI(i) and the upUI(s). Depending on the specifications of each ID Issuer in what constitutes the "serialized element", the upUI(i) MAY BE equal to the upUI(s) or they may differ in information blocks. The expectation is that they refer to the same serial number, not a different list of serial numbers.

4. Questions regarding data types and formats

Question	Answer
Please confirm if the primary is required to validate the new country code "XZ" in the message received.	The Primary Repository is expected to accept XZ as a valid country code for all messages where the data type "Country" is in use
The description mentions the exceptions XI and XZ but not XK. Either add XK or simply refer to the complete list in chapter 2.6.1	Thank you, As amended, we have referred to section 2.6.1. This change will be visible when the specifications are released as of the 21st of September 2023
The enumeration of P_type has been slightly modified to remove value 10 for TPD. Will there be any chance the same modification will also be applied to the UK to keep consistency between regulation and message values?	Please ask the UK authorities.
Time(L) format : YYYY-MM-ddTHH:mm:ss.SSSZ: Should we continue to accept the older format (without ms) and generate the ms to 000? , would it be allowed?	Yes, this will be the approach that we will take on Seconary and Router. It is a legal responsibility of the sender to report at the millisecond level, but there is no need to block this on a technical level, as seconds are a superset of milliseconds
There are two fields for Producer, 2 fields for Model, and 2 fields for Number. Only one field Producer, one field Model, and one field Number seems enough. We suggest to have only one field. If not possible, we suggest keeping the same length for the Producer, Model, and Number fields.	These fields are explicitly required in the amendment of the Implementing regulation published by the authorities and they can't be changed or ignored. However, just to clarify, they are distinguished by a prefix, which is P_ for machine parts (M_entirety = 0), and M_ for "entire" machines (M_entirety = 1). In regards to the length, they all share the same length of 20 characters, there was a mistake however in messages RMA (3.4.7) and CMA (3.4.8) where the P_ had 200 chars, this has been corrected, and thanks for the feedback
It seems that the Subtype is not exported in the ProductLookup. Do you confirm it? What is the goal of this field if not exported? If two products are strictly identical except for the Subtype, do they have the same product code?	This was overlooked on our side, thanks for the comments. We have included the subtype in the flat files. Two products that are strictly identical except the subtype are different products, and now it will technically work due to the change in the ProductLookup.

Some fields, especially the address fields, are mentioned as "mandatory post data dictionary v2.0 goes live". What does it mean exactly? How will the go-live be managed? What happens if the EO is registered before the 2.0 goes live but changed after the 2.0 goes live: Which fields must be used? New address fields are really short: EO_street length is 300 although EO_Address_StreetOne is 5000! Could you keep the same length for the address fields, please? Why have duplicated address fields? The field before and after 2.0 seems identical except for the postcode which is now mandatory. Could you avoid duplicate fields, please? We suggest having only five address fields since there is only one change in the regulation: the postcode becomes mandatory.	There is no intention from Dentsu to force all ID Issuers to update their existing registries to the new fields outlined by the regulation. This is the reason why the old format for the address is supported, but from 2.0 onwards only the new fields described in the regulation are accepted. The postal code is not the only change as the field names themselves have to change and the specifications must cover exactly the regulation. Since the new address fields are very explicit in what they describe, we believe the current limits are sufficient to declare the information required.
The comments for the field PrevMID_ID seem wrong May the PrevMID_ID be filled by a MID from another UID issuer? May the PrevMID_ID be filled by a MID belonging to another EO and/or F?	Thanks, amended the PrevMID_ID's comments. "May the PrevMID_ID be filled by a MID from another UID issuer? " No. "May the PrevMID_ID be filled by a MID belonging to another EO and/or F?" This depends on the specification of each ID Issuer, from a Secondary Repository point of view all the EO-IDs, F-IDs, and M-IDs issued by a specific ID Issuer may be updated or modified by the ID-Issuer with the usage of message ULO/PLO as necessary.
Eo_email is a Text(5000) while in the datatype (2.1) the type “Email” is Text(80) with regex. Which one are we going to use?	Thanks for the feedback, adjusted all email's lengths to 80 chars
M_Producer, model e number is Text(200) while in the datatype (2.5.3) is Text(20). Which one are we going to use?	Thanks for the feedback, this was a typo, we will use Text(20)
The info about the new fields (P_units, p_syubtype_exists, P_subtype_name) is missing. Does it mean that the creation of new ProductLookupIds doesn’t have to consider those data and they don’t need to be sent to the secondary repository (via flat files)?	We have overlooked this part and now has been corrected, thanks for the feedback. The subtype is part of the product lookups
We have seen that in the Other_FID_n and M_plist, there is a list of FIDs/MIDs. Which character do we need to use to split those data when sending the data via PLO? (For example, we may not use comma (“,”) otherwise the CSV won’t work correctly)	You may split the list of values inside OtherFID_N and M_plist using the character "#", but not ";". The ";" is the one used to separate fields within the CSV declaration, you can check the sample at 3.9.3.4. The "#" should never be part of a M_ID or F_ID since it is not part of the invariant set of ISO646
Does MTL (Message_Time_Long) contain the time in milliseconds format for the message to primary from the Router? After cutover, will the primary need to modify the MTL in the message from the Router to include the time in milliseconds format? Also please confirm if primary also needs to allow both milli sec and seconds format for router messages.	Yes to both questions.

The address fields had max-length Text(5000) in specifications changes version 1.4.6 and the Text(5000) max-length is changed for address fields in specifications changes version 2.0 for EDP, ETL, EIV, and EPO. Please confirm if the primary should remove the Text(5000) max-length for both BAT and Router messages.	Yes, lengths should be adjusted in the entire repositories system to the new values (Primary Repositories, Secondary Repository, and Router)
About the new SubType fields, is it required to register the products again if they have a subtype associated?	There is no registration of products in the Repositories system. If you refer to the EU-CEG system please ask the authorities.
Do you know if some ID Issuers announce they will change their format?	We are not aware. Please keep in mind that ID issuers are not required to inform Dentsu of any changes in their specifications.
In connection with the change of identifiers where "Novel tobacco product" changes its dictionary identifier from 10 to 11, and "Other" from 11 to 12, are there any planned conversions of the existing data?	No, the Secondary Repository will show the data related to Product Types as of today until v2.0 is released and the new values after 2.0 are released.

5. Questions regarding technical validations

Question	Answer
In the Validation Control "VAL_UI_ORD_REACTIVATION_NOT_ALLOWED" only the IRA (2.2) is marked as in scope in section 3.3.4 Validation Scope (page # 59) However, section 3.3.3.5.2 Application and deactivation sequence validation, mentions - New Validation Control: VAL_UI_ORD_REACTIVATION_NOT_ALLOWED scope added IRR. Could you please confirm and update the section 3.3.4 Validation Scope	You're right, updated.
Please confirm if IRR and EDX are in the scope for Validation Control VAL_ENT_ACTIVE_FID. The "EU_Secondary_ListOfSpecifications_Changes_1_4_6_to_2_0_0-Draft.pdf" shows VAL_ENT_ACTIVE_FID -> Added EDX and IRR to the scope, whereas the "EU_Secondary_DataDictionary_2_0_0-Draft.pdf" shows the scope ISU – ISA – IRU – IRA - IRR – EUA – EPA.	This validation applies only to the Router, not the Primary Repository. We have added EDX to 3.3.3.7 Identification Code validation - VAL_ENT_ACTIVE_FID
The Entity Validation Control VAL_ENT_ACTIVE_EOID shows EDX (3.8) not in scope in section 3.3.4 Validation Scope (page # 59) However, section 3.3.3.7 Identification Code validation, shows EDX (3.8) within the scope of Validation Control VAL_ENT_ACTIVE_EOID Could you please clarify and update section 3.3.4 Validation Scope?	Thanks, amended. This validation applies only to the Router, not the Primary Repository. We have added VAL_ENT_ACTIVE_EOID - EDX to 3.3.4 Validation Scope
Primary has received the IRU 2-1 message before the date of compliance 21/12/2023, however, the application of pack codes through EUA 3-1 is received at Primary after the compliance date. The Validation Control VAL_UI_HR_EXIST will return an error as its Human Readable form upUI(s) does not exist in the preceding IRU 2-1 message. Could you please confirm if there is any grace period / cutover approach or relaxation for Validation Control VAL_UI_HR_EXIST in this scenario?	This is not correct. The validation VAL_UI_HR_EXIST states: "It is only possible to perform this validation for codes issued after the go-live date of the v2.0 of the specifications. Therefore, this validation shall only be performed by the Primary Repositories and Secondary Repository when the IRU message contains the upUI(s) list when received from the ID Issuers, otherwise, it is not possible to perform the validation."; -> The intention of this sentence is that the Primary Repository should be able to evaluate for each upUI(L) if the application of the validation VAL_UI_HR_EXIST applies or not. In essence, if the associated upUI(i) to the upUI(L) to be validated is issued before the 2.0 goes live, then the validation must be skipped. If, on the contrary, the associated upUI(i) of the upUI(L) to be validated is issued after go-live, then there will be an upUI(s) to which to validate against, and therefore the validation must be performed. This allows for backward compatibility on EUA (3.1) validation with older codes to be able to allow them to be used within their 6 months of expiration time. Note that this also allows to validation of an EUA (3.1) with mixed upUIs from before and after

	2.0 since each upUI(L) can be validated individually. Therefore we don't see the need for a grace period.
F_ID validation was changed for all messages but it should not be added to IDA (2.3). Could this point be clarified in the spec? VAL_ENT_EXIST_FID is not valid for destruction.	VAL_ENT_EXIST_FID only checks that the FID exists in the system, it has no relationship whatsoever with the LOCATION_VALIDATION. Nothing has changed in this regard from the pre-2.0 version.
VAL_ENT_ACTIVE_FID should also apply for EDX	Yes, it has been corrected for the release version
VAL_UI_HR_EXIST: Existing control is already applied on message EUA 3.1 to upUI(i). Additional control is required on the same message for the same code but in a different format. First, this will have an impact on the performance of checking twice codes. Second, does that mean that no control is done on message IRU from the Id-issuer which implies for primary to process and store wrong data that can not be used if errors are raised?	First - Yes it will have a performance impact on the entire system, but it's necessary to ensure that the are no erroneous or duplicate human readable codes. Second - There is no difference between the current system and the new system with an additional list of human-readable UIs, the IRU will be validated like today and the assumption is the ID Issuer delivers the same codes to the manufacturer and the router, so if there is a mistake it will be spotted by all systems and treated via a support incident.
Could you please confirm if the Entity Validation: VAL_ENT_ACTIVE_EOID is in the scope of primary for 2.x and 3.x message types.	It is not in scope for the Primary, only for the Router.
A manufacturer will place an order to the ID Issuer for the pack codes and the primary will receive the IRU 2-1 message before the date of compliance 21/12/2023 and BAT could use the pack codes within the next six months. Could Dentsu allow for a grace period or any cutover approach for primary to verify Human Readable upUI(s)?	The validation VAL_UI_HR_EXIST states: "It is only possible to perform this validation for codes issued after the go-live date of the v2.0 of the specifications. Therefore, this validation shall only be performed by the Primary Repositories and Secondary Repository when the IRU message contains the upUI(s) list when received from the ID Issuers, otherwise, it is not possible to perform the validation."; -> The intention of this sentence is that the Primary Repository should be able to evaluate for each upUI(L) if the application of the validation VAL_UI_HR_EXIST applies or not. In essence, if the associated upUI(i) to the upUI(L) to be validated is issued before the 2.0 goes live, then the validation must be skipped. If, on the contrary, the associated upUI(i) of the upUI(L) to be validated is issued after go-live, then there will be an upUI(s) to which to validate against, and therefore the validation must be performed. This allows for backward compatibility on EUA (3.1) validation with older codes. Note that this also allows to validation of an EUA (3.1) with mixed upUIs from before and after 2.0 since each upUI(L) can be validated individually. Therefore we don't see the need for a grace period.

6. Questions regarding the reporting of messages

Question	Answer
Scenarios for recovery of stolen goods and implicit disaggregation – e.g. what happens if a pallet is recovered that has been opened, so is not complete? Can that pallet ever be re-used (potentially not, if goods are recovered at master case level)	The intention was that IRR could be reported for any of the children hierarchy UIDs of the original IDA message. Meaning that yes, it is possible to reactivate some master cases when a full pallet was stolen and opened. We will rework the wording so it's more clear.
A pallet is reactivated through IRR 2-4 message, which should primarily change the entire hierarchy of the pallet (e.g. Mastercases/Outers/unit packs) to "reactivated". Are any further aggregations EPA 3-2 with new children allowed for the pallet?	Yes, the entire hierarchy should be reactivated. Yes, new EPAs are allowed.
The pallet hierarchy is deactivated in a preceding message type IDA 2-3 with the field Deact_Reason1 = 2. Now the children (Mastercase) are activated in the subsequent IRR 2-4, will this IRR 2-4 message trigger an implicit disaggregation on the pallet?	Yes and we have modified section 3.5.8.5 describing that exactly since it was missing, thanks
Have you real numbers of how many machine parts can have a producer or importer machine? You say the limit is 1000 in the documentation (2.5.3), but we need some real numbers.	We do not have any real numbers on how many machine parts the member states expect the manufacturers to report. We believe that this limit should cover the needs, however, we are not involved in the discussion between the regulators and the member states to define anything related to Machine Parts.
Primary has observed that the maximum count of upUI in IRU 2-1 message is reduced to 10k in the specifications. Could Dentsu provide the business reason for this change?	From a business point of view today the IRU is already a "chunk" of an order of codes since an order of codes can be bigger than the current limit of 6MB (which corresponds to approximately 180k-200k ups, depending on the length). Since the relationship between IRU and Code Order is already partitioned, we are further partitioning the message down for technical reasons (That is, the IRU is the biggest message in the system, which is the most special one to treat at the Router level, and Primary Repository level. We believe that reducing the IRU size is going to further strengthen the repositories system).
Could Dentsu please confirm why an ETL 3-5 is not allowed after EDX 3-8? (When ETL 3-5 of export with full address is allowed after EDX 3-8) In section 3.6.8.4, it is mentioned that the most significant exception is that it is not possible to declare ETL (3.5 Transloading) after an EDX 3.8.	When an EO reports a transloading event, information about the destination facility needs to be provided to the system. The next event (after the transloading) that needs to be reported to the system, should be the arrival of the product at the destination facility. Therefore, the transloading event (message 3.5 - ETL) should always be between a dispatch (message 3.3. - EDP) and an arrival event (message 3.4 - ERP). Laboratories, waste disposal centres, national authorities, international governmental organisations embassies, and military bases do not qualify as facilities (where tobacco products are manufactured, stored, logistically or financially handled or placed on the market) within the meaning of 2(6) of the Implementing Regulation and thus, cannot be identified by an FID. In this case, the last event that needs to be reported to the system should be the

	dispatch of the products (from a facility) to these non-trade destinations. Transloading (message 3.5) is not permitted after this "special" dispatch (message 3.8) since the reporting of the arrival of the products at these destinations is not feasible.
Why is it not allowed to recall an IDA 2-3 deactivation message when Deact_Reason1 = "2 – Product stolen"? Could Dentsu please provide the Business reason for Recalling the 2-3 IDA message within 24 hrs.	Please refer to the revised regulation, Annex II, section 2.7 "2.7. Section 5 in Chapter II is amended as follows: 'Recalls 5. Recalls of requests, operational and transactional messages (possible for message types 2-1, 2-2, 2-3 (only within 24 hours from the original reporting of message 2-3, for Deact_Reason1 other than "2 – Product stolen"), 3-1 to 3-8, 4-1, 4-2 and 4-3)".
Why is the RCL message with recall reason 1 required to recall the previous message 3-3 EDP, 3-5 ETL, and 3-8 EDX?	Please refer to the revised regulation, Annex II, section 2.7 recall message field "Recall_Reason1", in the description it states "1– the reported event did not materialize (only for message types 3-3, 3-5 and 3-8)". Please refer to the Data Dictionary section 3.8.1.2 "For recall reason 1, previous messages can only be 3.3 EDP, 3.5 ETL, and 3.8 EDX". You CAN recall an EDP/ETL/EDX with a different reason than 1, it's just that if you use reason 1 in the recall, the previous message must be EDP/ETL or EDX as stated in the regulation.
The new limit of 10k UIs per message is not adequate for Business. Could Dentsu reconsider and change the UI limit to 50K, for the messages IDA 2-3, IRR 2-4, EUA 3-1, EPA 3-2, EDP 3-3, ERP 3-4, ETL 3-5, EUD 3-6, EVR 3-7, EDX 3-8, EIV 4-1, EPO 4-2 and EPR 4-3.	We have re-evaluated and decided to keep the 1k limit for IDA, but increase the limit to 5k for all other messages (except IRU which is 20k, 10k for upUI(i) + 10k for upUI(s))
"The Primary Repositories and the parties reporting to the Router must report the messages reported by the manufacturer or by them in the same sequence. The reporting of messages to the Secondary Repository and the Router is completed upon reception of an acknowledgment message by the Secondary Repository or the Router." -- Manufacturers do not receive acknowledgment from the secondary, but rather from the primary. The implementing act specifies successful transmission when receiving a positive acknowledgment from the primary, why has this legal definition changed to the positive acknowledgment from the secondary?	This section has been reworked since it didn't match the original intention, please check the final version published on 21st of September 2023.
Will messages with more than 1k IDs be rejected by the Secondary/Router? We don't see an error code that is related to this. So what will happen if a 3-3 message has more than 1k IDs?	We will use the same error code that we have today for the 50.000 UIs limit, which is: VAL_MSG_JSON - MAX_LENGTH_FAILED_VALIDATION
Clarification also for the commissioning message in regards to 1k do upUI(L) and upUI(S) count together for the 1k validation. For IRU this information for the different arrays is provided however not for the EUA message.	For the IRU there is a different limit, see section 5.2.11.2 Maximum number of UI of the list of specifications. The limit is 20.000 UIDs, split into 10.000 upUI(i) and 10.000 upUI(s)

The 2-4 message cannot be recalled. According to (LoS 5.2.7.4). Is that correct and what is the background of that functional decision?	Please refer to the revised regulation, Annex II, section 2.7 "2.7. Section 5 in Chapter II is amended as follows: 'Recalls 5. Recalls of requests, operational and transactional messages (possible for message types 2-1, 2-2, 2-3 (only within 24 hours from the original reporting of message 2-3, for Deact_Reason1 other than "2 – Product stolen"), 3-1 to 3-8, 4-1, 4-2 and 4-3)". The functional decision is that we have to specify what is written in the regulation
EDX usage overall would be good to clarify. At this moment we assume each market once a month.	It is not for Dentsu to specify when EDX should be used but for the Economic Operators.
What is the meaning of property 'Extensibility' in the REO request and response? What is the meaning of the property 'EO_OtherID'?	"Extensibility" is a field that has been present since May 2019 and it refers to the capacity of the ID Issuers to extend the message to include any further fields that they consider necessary for the proper functioning of their system. As for the field "EO_OtherID", it has been there since the initial regulation in May 2019, please refer to message 1.1 fields "OtherEOID_R" and "OtherEOID_N". These fields seem to be for audit records only and have no operational impact, it's up to the ID Issuer to decide how they should be employed.
Article 27 (10) of the amended TPD requires the operator of the Secondary to grant access to ID Issuers and Primary Repositories to the registration data stored in the Secondary. For us especially the address data of EO and facility registrations is important to decide on export control cases. I haven't found any message suitable serving this purpose. How do you plan to grant this access?	In the Data Dictionary section 3.4.10 ICV, you may find the specification for ID Issuers and Primary Providers to be able to check the existence and the activation status of EO-IDs, F-IDs, and M-IDs. Our interpretation is that this is the information that can be shared with ID Issuers and Primary Providers to check against the registry. As per the regulation, only the information required for validating messages sent to ID Issuers and Primary Repositories from stakeholders is shared from the Secondary Repository.
Will there be any check on FID's previous ID for RFA (1.7) or CMA (1.8) messages? Is there a general recommendation on this topic or is it up to the Id-issuers?	There will be no check on older FIDs, the Secondary will accept via ULO message the old FIDs and the new FIDs, it is up to the ID Issuer to decide when/how/if to update the information on all FIDs to the new fields.
Except for IRU, the number of UI (upUi+aUI) is set to 1000: This value is much lower than from previous version. Is it possible to increase this value? Several customers will face large issues or difficulties, especially for EDP and IDA. Could you consider increasing this number to 5000?	Yes, we have re-evaluated and decided to keep the 1k limit for IDA, but increase the limit to 5k for all other messages (except IRU which is 20k, 10k for upUI(i) + 10k for upUI(s))
Except for IRU, the number of UI (upUi+aUI) is set to 1000: Do you assume any control over that limit?	Yes, we will use the same error code that we have today for the 50.000 UIs limit, which is: VAL_MSG_JSON - MAX_LENGTH_FAILED_VALIDATION; Primary Providers shall implement the same validation for the 1000 / 5000 limits

So far, there is no control on message IDA 2.3 deact_reason = 2 which implies UI is already applied (EUA). Furthermore from the sequence table, EUA 3.1 cannot be sent after an IRR 2.4. In this specific sequence (2.1-> 2.3->2.4 ->3.1?) should we expect a SEQUENCE_UI_ERROR? Or an additional control should be performed to ensure IRR 2.4 applies on an aUI?	We agree with your assessment, we have added a new control to block IDA "product stolen" on non-activated upUIs that return a UI_SEQUENCE_ERROR. IRR can be done on upUIs as long as they were activated (associated with a 3.1 message).
Is there a reason why a 3.8 is not possible after importation (3.1-3.2)? Not a frequent use case but why would it be not possible to import products for EU laboratory analysis, for instance?	The reason is that the first product movement that can be declared on imported products is an Arrivals 3.4 - ERP to declare the entry point into the EU. After the arrival is declared, EDX 3.8 can be declared. So it's the same situation as today before the 2.0 specifications for EDP 3.3.
If we imagine the following sequence (2.1-> 3.1-> 3.2->3.8->2.3->2.4->3.2), we understand that location validation of the last 3.2 should done at the previous state of UI so at the location of 3.8. Later on in the specifications, it seems that location validation is done on the 2.4 location of recovery. Thus could you precise the sentence, please?	The intention was that the location validation of the 3.2 EPA is performed against the FID declared in the 2.4 IRR message. We have rephrased the parts you suggest to clearly state that IRR should behave like an Arrivals ERP Return, the difference being that IRR is preceded by IDA whereas ERP Return is preceded by EDP/ETL, but in terms of location validation, they behave the same.
3.8.1 RCL – (5.0): Do you have an idea why there is a 24-hour limitation?	It's written in the new regulation revision, Annex II, Point 5 "Recalls": Recalls of requests, operational and transactional messages (possible for message types 2-1, 2-2, 2-3 (**only within 24 hours from the original reporting of message 2-3**, for Deact_Reason1 other than “2 – Product stolen”), 3-1 to 3-8, 4-1, 4-2 and 4-3)".
3.8.1 RCL – (5.0): Do you advise using record time (MTL) as it defines more accurately the definition, or event in order for router and PR to refer to the exact same value?	We specified to use "Reception Time" which is defined as "System reception Time added by the Router or the Primary Repository". So basically when the message was received by the Primary Repository in milliseconds. Don't use the event time as this is declared by the sender and will not allow us to measure the 24 hours properly.
Do you have an idea why message 2.4 is not recallable? Technically we have a workaround with another IDA 2.3 but it is not the same.	It's written in the new regulation revision, Annex II, Point 5 "Recalls": Recalls of requests, operational and transactional messages (possible for message types **2-1, 2-2, 2-3** (only within 24 hours from the original reporting of message 2-3, for Deact_Reason1 other than “2 – Product stolen”), **3-1 to 3-8, 4-1, 4-2 and 4-3**)".
A new limit is introduced in the IRU message which is very low (20000 UI). Could you increase this limit to 200000 (2x100000)? Having a low limit has huge consequences on the process for UID issuers and Economic Operators.	Today the limit is 6MB, which roughly maps to 180.000 codes. Taking the new list into account, this would mean 90.000 upUIs(i) and 90.000 upUIs(s)
In section 3.5.8 IRR – (2.4) Request for reactivation of UIs for products reported as stolen but recovered "The reactivation can be done at an upUI or aUI level and it implies the return to a previous valid state to the deactivation." Question: Does this mean that the primary should revert the state to what it was before the IDA 2-3 deactivation of UI?	This was poorly phrased on our side, we have reworked it. The intention is that IRR acts like an "Arrival returns" setting the products "in stock" at the location declared in the IRR

In the section 3.3.3.5 UI level Message sequence validation, 3.3.3.5.1 Sequence Validation overview, PREVIOUS MESSAGE on the UI present in the received message: IRR 2-4 Message Received: ERP 3-4 or ERP 3-4 (Return) Question: Could you please confirm if an ERP 3-4 or an ERP 3-4 (Product Return), is allowed after an IRR 2-4, how can a reactivated UI return back to the warehouse without prior shipment or dispatch?	Thanks for the feedback, ERP/ERP Return after IRR should not be allowed. We have corrected the table to deny both ERP and ERP Return.
In EU_Secondary_ListOfSpecifications_Changes_1_4_6_to_2_0_0-Draft.pdf, in the section 3 Data Dictionary 2.0 Updates, section 3.3.3.5.1 Sequence Validation overview: "Clarified that ETL can be performed after EDX if reported with the full address like the case of export" In EU_Secondary_DataDictionary_2_0_0-Draft.pdf, in the section 3.3.3.5.1 Sequence Validation overview, "ETL 3-5 is not allowed after EDX 3-8" in section 3.6.8.4 Sequence validation, "The most significant exception is that it is not possible to declare ETL (3.5 Transloading) after an EDX 3.8." Could you please confirm if ETL 3-5 (of type export with full address) is allowed after EDX 3-8	When an EO reports a transloading event, information about the destination facility needs to be provided to the system. The next event (after the transloading) that needs to be reported to the system, should be the arrival of the product at the destination facility. Therefore, the transloading event (message 3.5 - ETL) should always be between a dispatch (message 3.3. - EDP) and an arrival event (message 3.4 - ERP). Laboratories, waste disposal centres, national authorities, international governmental organisations embassies, and military bases do not qualify as facilities (where tobacco products are manufactured, stored, logistically or financially handled or placed on the market) within the meaning of 2(6) of the Implementing Regulation and thus, cannot be identified by an FID. In this case, the last event that needs to be reported to the system should be the dispatch of the products (from a facility) to these non-trade destinations. Transloading (message 3.5) is not permitted after this "special" dispatch (message 3.8) since the reporting of the arrival of the products at these destinations is not feasible.
If by mistake in message EDX (3.8) it is used Destination_1, Destination_2 ...Destination_5 (p. 145 of EU_Secondary_DataDictionary_2_0_0-Draft.pdf) - "ID" part is missing? In comparison in the existing message EDP (3.3), it is used Destination_ID1, Destination_ID2, ..., Destination_ID5 ((p. 120 of EU_Secondary_DataDictionary_2_0_0-Draft.pdf).	We have respected the names provided to the fields in the regulation, where in EDX it is "Destination_1, Destination_2, etc." and in EDP (and others) it's "Destination_ID1, Destination_ID2, etc". If the wrong field name is used in the message, the message will fail.
In the case where unit-level Unique identifiers are issued for machine codes derived from another ISSUER ID, how will the "Verification request for the Identification Codes - ICV" communicate that the code being verified is a machine part code and not a machine?	We have updated the ICV message to return the status on whether the machine is part or whole, please check it on the release version of the specifications.
In view of the new provisions in EU Regulation 2023/448 relating to Regulation 2018/574 Article 25(1), point (g) “Messages transmitted by the ID issuers and the primary repositories to the router and the secondary repository shall be validated again by the recipient;’; “ will there be any new functionality or change in the process of transmitting messages through the router?	The current implementation of the system already covers this requirement and we will not add any new functionality or change in the process of validating messages at the Router.

7. Questions regarding machine parts

Question	Answer
"In case a Machine ID that contains identifiable parts, is de-registered, all parts will be automatically de-registered as well." So in reality BAT will never be able to use mobile machine parts, as de-registering a machine with a mobile part will also de-register the mobile part used in other machines. What is the point then of a mobile machine part if this cannot be used?	We have reworked the de-registration/de-activation scenario. In the case that the de-registration/de-activation happens at the EO-ID or F-ID level, all registries in the hierarchy below should be de-registered/de-activated (including mobile machine parts). However, if only a specific M-ID is de-registered/de-activated, the mobile part SHALL NOT be automatically de-registered/de-activated, unless the mobile part is associated ONLY with the Machine ID being deregistered/de-activated.
The recommendation is to first register the machine part, and then to register the machine. How will BAT update existing machines to include machine parts without impacting the existing machine code? (codes were purchased against these machine codes and updating the machine codes is not possible)	For existing machines, the manufacturer/importer should first register all the parts that belong to that machine, then send a message 1.8 to the ID Issuer which will allow them to include the list of parts in an existing machine. Code ordering is not impacted as there is no requirement for a machine to have parts to be able to request codes on it. Our technical view of machine parts is that it's master data that does not interfere with the operation of the system.
The exception to the implicit machine deregistration seems questionable to me. Even mobile machines are bound to one and just one facility. If the F-ID is deactivated, the mobile machine would have no linked active facility anymore leaving an orphan. I also find it hard to imagine a practical case where a mobile machine remains bound to a facility in status deactivated, because all non-mobile machines linked to the deactivated facility have been deactivated as well, leaving no active machine the mobile machine can be shared with.	We have reworked the de-registration/de-activation scenario. In the case that the de-registration/de-activation happens at the EO-ID or F-ID level, all registries in the hierarchy below should be de-registered/de-activated (including mobile machine parts). However, if only a specific M-ID is de-registered/de-activated, the mobile part SHALL NOT be automatically de-registered/de-activated, unless the mobile part is associated ONLY with the Machine ID being deregistered/de-activated.
Given an M-ID of type entire-machine used in upUI orders already. Is the producer allowed to change this machine to type machine-part? As links to previous operations will be maintained this would lead to the prohibited situation where upUI orders are linked to a machine of type machine-part. Perhaps this scenario shall be prohibited.	We agree with your assessment, we have forbidden to modify M_entirety for M-IDs, so an Entire Machine cannot be converted into a Machine Part and vice-versa. The change has been added to the final version of the specifications.
The description says: 'All associated Machine Parts will be automatically de-registered as well.' I guess that this doesn't apply to parts with mobile attribute sets, as those machine parts are shared among multiple machines. Please confirm.	Yes, we have amended the description of this message to specify that mobile machine parts shall not be automatically de-registered / de-activated unless the mobile part is associated with only 1 M_ID

While this is possible for M-IDs registered at the ID Issuer the upUIs are orders, ID Issuers can't verify this constraint for M-IDs issued by other ID-Issuers. The ICV message doesn't contain the required information to decide on this constraint. I also see no other suitable message to serve this purpose. Please explain, how ID Issuers shall verify M-IDs issued by foreign ID issuers.	We have updated the ICV message to return the status on whether the machine is part or whole, please check it on the release version of the specifications.
Will it be possible to update the existing machine with the addition of the machine part without creating a new machine (as codes were already ordered for that existing machine)?	Yes, it is possible to update existing machines to add machine parts so existing MIDs can be kept.
Is it allowed to deregister a machine part that is currently part of an active machine?	Yes
There is an exception to the rule saying that the Mobile Machine Parts shall not be automatically deregistered as they may be reused in another Machine ID. Is this exception compliant with paragraph 4.1.9.1 saying that the parts of a machine must be deregitered as well in case of deregistration of the machine? How can the UID Issuer know if the mobile machine part will be reused or not? Could you clarify the rules for automatic deregistration of machine parts?	Rules for automatic deactivation/deregistration of machine parts have been clarified/reworked in the final version, thank you for your feedback.
We have not found any indication that a Machine Part may be part of two different Machine entities. Is this scenario actually possible? In this case, auto de-register all machine parts when an entire machine is deregistered may lead to misalignment when a machine part is part of two different Machine's entirety.	There are 2 types of machine parts, fixed and mobile. Fixed machine parts are attached to one machine (M_entirety = 1), it is reasonable to assume that when receiving a message 1.9 De-registration of a machine identifier code, any fixed machine part is automatically de-registered. If any of the fixed machine parts is to be re-used in any other active machine, a message 1.8 correction of information concerning the machine identifier code can be used to de-attach that machine part previous to the de-activation of the intended machine. For mobile machine parts, given their implicit nature, they can be used in multiple machines with M_entirety = 1. When de-registering an entire machine, as a principle, mobile machine parts are not automatically de-registered. Mobile machine parts are only automatically de-registered when (1) The EO they belong to is de-registered, (2) The facility they belong to is de-registered, (3) When deactivating the entire machine the mobile machine part becomes "orphan", this is, it is not found in any other machine.
Should we apply the same exception for EO deregistration if we consider a machine part can be moved to another factory? Or should it be deregistered as well and re-registered again under the target facility providing the fields PrevMID_B and PrevMID_ID to reference the previous registration?	We have reworked the de-registration/de-activation scenario. In the case that the de-registration/de-activation happens at the EO-ID or F-ID level, all registries in the hierarchy below should be de-registered/de-activated (including mobile machine parts). The rules for moving Machine Parts between factories should be set out by the ID Issuer specifications.
Does this mean that all existing machines shall be registered again or can we just register the parts and send message 1.8 to update existing machines with the list of parts?	You can register the parts and then use message 1.8 to modify existing machines and include the list of parts

Could you please provide an exhaustive list of the types of machine parts that should be registered, so we can figure out what is relevant?	Please raise this question to the competent authorities.
When deregistering a machine, all parts are deregistered but is it the case also for mobile parts?	We have reworked the automatic deactivation/deregistering rules. As a summary: If deactivating/deregistering an EO-ID, everything attached to it will be deregistered/deactivated (including fixed and mobile parts). When deactivating/deregistering an F-ID, everything attached to it will be deregistered/deactivated (including fixed and mobile machine parts). When deactivating/deregistering a machine, fixed parts will be automatically deregistered/deactivated but mobile parts will only be deregistered/deactivated if they are attached to the machine being deregistered/deactivated (meaning that if the mobile part is associated with at least another machine, it will NOT be automatically deregistered/deactivated)
Can we assume that registered machines will contain machine parts registered only within the same EOID entity and FID facility? Do we need to provide for cases where a machine will consist of parts distributed in different countries, e.g., manufacturing of a product in America and a pre-packaging machine in a country within the EU? Do we perhaps exclude the registration of such cases?	This is up to you to decide on your ID Issuer specifications. Please ask the authorities.

8. Questions regarding other topics

Question	Answer
The LDI interface is implemented only on the Router? How and with what credentials can a manufacturer use this interface? TODO read the chapter and provided a more detailed question	The LDI interface has been available for several versions. Manufacturers/Importers can request credentials via the Self-Service Portal in the Secondary Repository or by opening a ticket to us so we can assist. Please note several Manufacturers/Importers are already using the interface.
In what cases the Manufacturers and Distributors will need to update their data registering F_ID and EO_Ids (4.1)	Economic Operators are expected to keep an up-to-date copy of their records towards the ID Issuers at all times.
Amended TPD Annex II 'Key messages to be sent by the economic operator' introduces the identification of the message originator. In the case of IT service providers acting on behalf of an EO, this is a different entity from the one obliged with the reporting. I wonder why I don't see a new property messageOriginator in every message? How do you expect the message originator to be reported to the Secondary?	The system detects the sender of the message by the OAUTH2 credentials (clientID). The system detects the message originator by the Economic Operator ID (EO-ID).
As a general remark, neither in Dentsu specifications nor the TPD amendment document itself clearly indicated the reason for each change (why registering machine parts? What are they? Why adding new properties for product subtype? Why providing Machine and Human readable codes in 2 separate sets? ...) The intent behind each change is not explicitly explained and this makes it difficult to understand all the implications of these changes and what is the meaning of each new field, and what exactly to provide as information... Would it be possible to provide some clarifications on this side?	Please raise this question to the competent authorities.
What is the purpose of the new field EO_OtherID? In which situation it would be necessary to provide it?	This field is not new to Specifications 2.0 and has been there since previous versions.
When a facility changes its economic operator, what are the consequences if we omit by mistake the previous facility identifier used by the former operator of the facility (PrevFID_ID)?	Please raise this question to the competent authorities.
Since QCUKT provides today the same API for both TPD and UK regulations and the API for the UK doesn't change, how this will be handled on the ID Issuer side?	Please ask the UK authorities.