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D5.4 – Technical solution for public non-confidential data



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Executive summary

One of the main tasks of Work Package 5 (WP5) in the Joint Action on Tobacco Control (JATC) project is to identify public non-confidential data in EU-CEG and facilitate making this information available to the public. This report builds on deliverable D.5.1 on the classification of public non-confidential data in EU-CEG and puts forward recommendations to the European Commission regarding the technical solution for the publication of public non-confidential data.

The report follows up on two separate surveys conducted by AGES (Austria) and SIK (Denmark). The surveys were distributed to national EU-CEG contact points and to members of the Expert Group on Tobacco Policy, respectively.

The report recognises the following considerations:

- The importance of accessibility with regard to member states' differing technical capacity

Recommendations for the centralised publication tool provided by the European Commission:

- The centralised publication tool should be a web based application.
- The centralised publication tool should be updated at least once a month.
- The centralised publication tool should have search, navigation and filtering functions.
- Users should be able to extract datasets in the following formats: xls, csv, xml and pdf.

Background

The aim of WP5 is to provide a framework for the efficient usage of data submitted through EU-CEG. One of its key tasks is to identify public non-confidential data in EU-CEG and facilitate making this information available to the public. This should be seen in line with article 5(4) of the Tobacco Products Directive 2014/40/EU (hereinafter 'the Directive'), which states that Member States shall ensure that the information submitted through the EU-CEG is made publicly available on a website and that The Commission and other Member States have access to this information.

This report provides recommendations to the European Commission on the technical solution for securely accessing and processing public non-confidential data, including best practices from Member State Competent Authorities on making data available to the public at national level.

Analysis of survey results

This analysis will for the sake of clarity, be divided into sections that each will address an aspect concerning the technical solution for the publication of EU-CEG data. This analysis is based on the results of two surveys that were conducted on the topics regarding technical solutions for publishing EU-CEG data. The data from these surveys indicate a need for a technically inclusive solution that accommodates the needs of all member states.

While the surveys showed that a majority of the member states have published lists of EU-CEG data available in their respective countries, the surveys did not specify which data is already being made publicly available. It is the working assumption of this report that most Member States would to some degree need a centralised publication tool to properly fulfil the requirements of the directive. This report will therefore, bearing this in mind, aim at recommending a technical solution that meets the needs of the majority of the Member States.

The format of the publication tool

The tool employed to publish the EU-CEG data should be able to process large amounts of data in a format that makes the data easy to access, navigate and understand by the Member States and the general public. The report also takes into account that Member States differ in their level of technical capacity. The tool in question should therefore have a format that is usable at all levels of technical ability. The conducted surveys found that a web based application was the preferred framework for publication. A web based solution is easily accessible from all devices i.e. computer, tablet, smartphone. Web based applications are accessible to most common web browsers i.e. Google Chrome, Safari, Mozilla Firefox. Web based applications also have the benefit of allowing multiple users to access the application at the same time. Using a web based solution would ensure that the tool is available to all Member States.

However, a web based application would potentially be more prone to vulnerable security breaches (e.g. CGI vulnerabilities), especially if the web based application is directly connected to the EU-CEG database. Extra precautions ought to be taken, to ensure that the EU-CEG system is protected from external risks factors.

This report also recommends that the centralised tool for publication be made available in all the languages of the different Member States so as to better facilitate linguistic diversity.

Frequency of updates on the centralised tool

The responses in the surveys indicated that the frequency with which the member states would need updates varied. The majority of answers requested monthly updates. It would however be advisable to take into consideration the advantages of using daily updates. Daily updates would provide a more accurate depiction of the current EU-CEG data submitted. It would also foster a greater culture of transparency of information. For example if a citizen was interested in gathering information on a new product sold their in respective country, the citizen might not have access to such information because of the delay in updating. This report would therefore like the Commission to consider the value of ensuring up to date information in the spirit of transparency, which the directive also aims at providing. Daily updates would also fulfil the needs of all Member States.

Other essential functions of the EU-CEG tool

Several of the respondents indicated that they would appreciate the tool having search, navigation and filtering functions. The filtering function should have the ability to separate the data into sections of countries, product type or brand name, just to mention a few of the options. (Please see report 5.1 for further information on categories that should be made available in the filtering option.) Some Member States made a point of highlighting the importance of being able to distinguish between products that have been approved for sale/marketing in the respective countries and having a general list of all submitted products displayed. Due to the fact that Member States have differing national laws with regard to how they regulate tobacco products, it would be prudent for the Commission to consider providing lists that distinguish between which products have been subject to approval in the respective countries.

It is essential that the centralised tool for publication is service-minded and easy to navigate. One way to secure this is to have a visible and noticeable search bar that is efficient in connecting the user to the content/data they are looking for. The search function should be paired with filtering facilities that show categories, so the user can specify what sort of data they are looking for.

A well structured navigation facility is advisable to have, to complement the search facility, as a guidance with controlled navigation paths that show contained elements within categories. We must keep in mind that users cannot always find what they are looking for because they don't always know

the relevant search terms and a navigation facility will then help users explore and discover new content and also help them discover content that is hard to find (Search functions operate on the basis of *knowing* what terms to search for).

The type of data that should be published on the EU-CEG tool.

Extracting datasets from the centralised publication tool is an essential feature that was requested by the majority of Member States. This report recommends making the formats xls, csv, xml and pdf available for download. For the sake of comprehensibility, it would be beneficial to consider, attaching a data selection function to the report generator. In this way, that user is able to select the data that they wish to be published in the generated rapport.

Public non-confidential information to be published

It is the recommendation this report that the classification of information should be done on the basis of the conclusions in report WP5 d.5.1.

Conclusions and recommendations

This report has attempted to recommend a solution that considers the needs of all the Member States while keeping in mind that the needs may vary from Member State to Member State.

A centralised tool offered by the Commission ought to accommodate as many of the needs as possible, as in this way, the Commission ensures a higher success rate through the actual usage of the tool. It is the recommendation of this report that the Commission uses a Web based application. The benefits of a web based solution as listed above, will serve to make the centralised publication tool as user friendly as possible. This is imperative due to the fact that Member States vary in their level of technical capacity.

This report finds that the following implementations are crucial for the successful usage of the EU-CEG centralized publication tool and to promote the objectives of the JATC project:

- A Web based application.
- A Search function that is immediately noticeable.
- Filtering functions available
- Navigation structure
- The ability to distinguish between approved and unapproved products
- A report generating function (xls, csv, xml and pdf)
- The tool being available in the different languages of the Member States.

It is not possible with complete certitude to predict the entire scope of vulnerability such a system might be prone to, at this juncture, however it worth considering potential vulnerabilities that may lead to security risks and a systematic protocol structure for continuous *vulnerability management* is recommended.