

Email-Verteiler
Infodienst_Import

21/02/2017

Reference: Changes in the Import Procedure

Dear Sir or Madam,

Dear Clients of the Prüfverein Verarbeitung,

The Amending Regulation (EC) 2016/1842 of 14th October 2016 has introduced, among other things, the TRACES data bank system for creation and dispatch of certificates of inspection for the importing of organic products from non-member countries as well as a new pattern for the certificate of inspection. Following the training event held in Nuremberg during the past weeks and organized by the Federal Association for Organic Control Bodies together with the BLE (Federal Office for Agriculture and Food), we can finally pass on to you today the first definite information regarding the new TRACES import documentation procedure.

In so doing, we want to limit ourselves to what are the most important elements for you and direct you for further information to what is contained in the supplement or the information of the European Community in the internet.

1. What is TRACES?

TRACES is an internet based system for creation and management of certificates of inspection (COI) for the importing of organic farming products from non-member countries. TRACES will be compulsory for use in the creation and dispatch of certificates of inspection and partial certificates of inspection.

2. Deadlines

The regulation regarding TRACES (EC) 2016/1842 (see enclosure) is effective from 19th April 2017. Prior to that date no certificates of inspection can be created in the TRACES-system. For a transition period until the 19th October 2017 certificates of inspection can be issued following the previous procedure (without using TRACES), afterwards that shall no longer be possible. However, the new form for a certificate of inspection must be used from the 19th April 2017. That means that all certificates of inspection which are issued from the 19th April 2017 must correspond to the new pattern (see enclosure Reg. 2016/1842).

3. Who has access to TRACES?

Access to TRACES is only granted to authorities (EC, Customs, and national authorities), non-member control bodies, importer control bodies, importers and original consignees. The access to TRACES must

even be applied for at <https://webgate.ec.europa.eu/tracesnt/login>. At this current time it is only possible to obtain a glimpse of TRACES in the training mode (see enclosure), since the official access to TRACES must be cleared or confirmed from an authority. The pre-requisite to be able to create a certificate of inspection is a valid access via the "EC Login". When you are logged in via the EC Login then you can log in to TRACES NT with your Username and Password. There you will find step-by-step instructions on how to create a certificate of inspection.

In the future COIs can only be generated by importers or a control body. The exporter is not granted access. Whether the original consignee will be granted access and thereby write permission is still not clear.

4. For How Long Will There Still Be Original Certificates of Inspection?

Fully electronic COIs are not possible in the foreseeable future, since the electronic signatures required for that are not yet installed. Consequently there will continue to be COIs in paper format, which will have to be presented in the original to Customs. In any case from the 19th October 2017 all COIs will have to be created within TRACES. The non-member country control body prints out the COI, signs the original and then sends it to the importer.

5. Standard Procedure

The importer provides all the data needed for TRACES (completely), and enters it themselves into TRACES. Only completely filled out COIs can be finished off and printed out. Alternatively the importer can send the data to the control body of the exporter and then they can create the TRACES document. The non-member country control body checks and verifies the data and concludes the process. Thereafter the COI is printed out and declared as valid by means of undersigning. Customs clearance, goods inward control and confirmation of the original consignee remain unchanged for the importer. Since the original consignee must be entered into TRACES and be verified, it can be sensible in many cases that the importer enters themselves as the original consignee and assigns the functions of the original consignee to a business already subject to the control procedure (assignment of functions to a third party). Otherwise each original consignee must be known, registered and verified at the time of creating the COI.

6. Changes During the Course of Importing and Open Questions

Currently there is no possibility for modification of the COI after conclusion of the TRACES procedure. Neither the weight nor the transport itinerary nor the means of transport can be altered. In this connection, as before, there still remains a multitude of open questions. That will affect in particular the air transport of fresh products. Customs has also already formulated these questions. Up until now there are no foreseeable suggestions for solutions. Importers must plan very exactly the importation and will require the complete information from the exporters rapidly and accurately. It is imperative that disruptions and delays be taken into consideration in accordance with the knowledge currently available. There is not yet any procedure to create modified COIs as replacements.

We shall keep you up to date with all improvements/changes as they occur.

Yours sincerely,

Prüfverein Verarbeitung e. V.