

TRACES – FAQ

Contents

1	General questions about TRACES	2
1.1	Is there an electronic seal in TRACES?	2
1.2	Does TRACES ensure that only certified companies act as producers, processors, last preparers, exporters, first recipients and importers?	3
1.3	Do imports still have to be reported in advance by the EU importing company to its EU organic inspection body or does this now happen automatically via TRACES?.....	3
1.4	Does a company automatically receive an electronic notification via TRACES when it is included on a certificate of inspection?.....	3
1.5	Is there a link between the Common Health Entry Document (CHED) and the certificate of inspection in TRACES?	3
2	Questions about the handling of the system	4
2.1	How do I register in the TRACES system?.....	4
2.2	How many profiles does a company need? What if you are the first recipient and importer?.....	4
2.3	How do more employees get access to TRACES?	5
2.4	Do changes in the master data need to be revalidated?	5
2.5	Who creates the certificate of inspection in TRACES, when must it be issued by?	5
2.6	Who can add new producers, processors, or exporters in the third country to TRACES?.....	5
2.7	What is the difference between an “organic importer” and an “organic operator”?	5
2.8	Is it possible to correct subsequently detected errors in the entry in TRACES?	6
2.9	Why can't the first recipient see the certificate of inspection after it is issued, even though he or she is named on it?	6
2.10	Is it obligatory to upload the accompanying documents of the goods?	6
2.11	What happens if the system fails?.....	6
3	Questions about the certificate of inspection	6
3.1	Field 1: Is it possible that field 1 and field 7 have different inspection bodies or authorities?	6
3.2	Does the body in field 1 also fill in fields 2 and 3 when IT fails (these fields are normally filled in automatically by the TRACES system)?.....	7
3.3	Field 4: Who must be specified if the producer is not the processor and there is both a producer and a processor?.....	7
3.4	Field 6: If the exporter is purely a trader with no physical contact with the goods, does he not appear on the certificate of inspection at all?	7
3.5	Field 10: What happens if the wrong customs authority/border inspection post is named on the COI?	7

3.6	Field 13: How can errors be avoided when entering CN codes?.....	7
3.7	Field 17: Is the information on the means of transport mandatory?	7
3.8	Field 24: Can the First Recipient be changed afterwards?.....	8
3.9	Field 24: Which address is to be entered if the first reception takes place at a company's premises?	8
3.10	Field 24: After the certificate of inspection has been issued, is it still possible to change whether the goods are to be imported directly or divided into lots?.....	8
3.11	Field 31: Does the first recipient need to sign only on paper or also be active in TRACES?	8
3.12	How do I create a partial certificate of inspection?	8
3.13	What is the process when, in the case of a partial certificate of inspection, it is decided that parts of the goods will not be imported into the EU after all, but will be resold duty unpaid to the third country?	8
4	Other	9
4.1	What is the import processing from Switzerland?.....	9
4.2	Is TRACES also used in Switzerland?.....	9

This document is provided to you by:

The Association of Organic Food Processors (AöL), Büro Lebensmittelkunde & Qualität GmbH (BLQ, Office of Food Science & Quality), Deutscher Fruchthandelsverband (DFHV, German Fruit Trade Association), Gesellschaft für Ressourcenschutz mbH (GfRS, Society for Resource Conservation) and OPTA Europe.

The authors do not guarantee the accuracy of the answers in this FAQ list. In case of doubt, the legal text of the relevant European regulations and German legislation shall apply.

1 General questions about TRACES

1.1 Is there an electronic seal in TRACES?

In accordance with Regulation (EU) 910/2014, the electronic seal was introduced with Regulation (EU) 2019/446 in April 2019 and has been implemented in TRACES since May 2019. The third country organic inspection body, if it already has the electronic seal, can issue the certificate of inspection (KB or English COI) as an electronic document. Whether the COI has been electronically signed is indicated by a lock symbol next to the document number. In order for imports with electronic seal to be processed in the EU, the competent national authorities in the EU must also set up the e-seal with them. So far, however, the

e-seal has only been implemented in a few Member States. Germany is not one of them, so this option cannot be considered here for the time being.

Pursuant to the Implementing Regulation (EU) 2020/977, there was a temporary option to process COIs paperless because of COVID-19. Until 31 Dec 2021, third-country organic inspection bodies could issue and validate COIs without an e-signature in TRACES. Customs validated the COIs created in this way in TRACES even without an e-seal. A physical original was therefore not required. However, this exemption has now expired. Since 1 January 2022, the COI must once again be issued in paper form and hand-signed or in digital form with an e-seal. For the import declaration, the state organic authorities have different requirements, and for some a scanned version is sufficient. The importer should clarify this in advance with the competent authority. From 1 July 2022, only the digital COI with e-seal will be available.

1.2 Does TRACES ensure that only certified companies act as producers, processors, last preparers, exporters, first recipients and importers?

With the amendment of the certificate of inspection by Regulation (EU) 2021/2306, trading companies without physical contact with goods are now also listed in the COI. Nevertheless, the supplier certificate should always be checked for validity before importing, as there can sometimes be a time delay in updating it in TRACES.

During the first registration in the system, a validation of the actors (verification of organic certification) takes place by the third country organic inspection bodies and the relevant EU organic authorities. However, the certificate validity is not (yet) continuously checked automatically in TRACES.

1.3 Do imports still have to be reported in advance by the EU importing company to its EU organic inspection body or does this now happen automatically via TRACES?

Since 1 January 2022, the import notification is made in TRACES via field 20 of the COI to the competent authorities/inspection authorities.

1.4 Does a company automatically receive an electronic notification via TRACES when it is included on a certificate of inspection?

This is currently not the case. When a third country inspection body creates a new certificate of inspection with your company as the importer, you are not automatically notified. The EU Commission is examining whether such notification can be introduced.

1.5 Is there a link between the Common Health Entry Document (CHED) and the certificate of inspection in TRACES?

Yes. Due to the closer integration of the EU Organic Regulation and the Control Regulation, the Common Health Entry Document (CHED) and the Certificate of Inspection will be linked in TRACES in the future. Accordingly, when you import goods subject to CHED, it is very important to follow the correct sequence of the import process. The certificate of inspection must always be released by the competent state organic authority first. Only then can the CHED be processed by the relevant customs authority. If the CHED was released first, processing of the certificate of inspection is no longer possible.

In case of a transfer CHED, first the transfer CHED is validated at the border control point (EU entry). Then the certificate of inspection must be released by the state - organic authority. Subsequently, the CHED is then processed by the customs authority.

Note: Whether you import goods subject to CHED or not, you can read in the relevant legislation or ask at a border inspection post, or customs. You can find out which legislation is relevant on the [GfRS website](#).

2 Questions about the handling of the system

2.1 How do I register in the TRACES system?

To register in TRACES, you first need an EU login. To do this, create a new account.

After successful creation of an EU login, log in to TRACES.NT. Here you will first be automatically redirected back to the EU login. There you log in, whereupon the registration screen for TRACES opens. There you must first choose a form of organisation under which to register. There are three options to choose from: Company (all private sector companies, such as importers or first recipients), inspection body (third country organic inspection bodies in accordance with Annex I and II of the Regulation (EU) 2021/2325, or authority (official bodies, such as the competent organic authority of a country).

In the following window, enter all the details about your company. Required fields are marked with a red asterisk.

In the Entrepreneur identifiers field, enter your EORI number.

Under Entrepreneurial Activities, enter “Organic Importer” for importers and “Organic Operator” for first recipients.

When all fields are filled in, click “Create” at the top.

However, before your company can be listed on a certificate of inspection in TRACES, it must first be verified by your local state organic authority. Since the authorities currently do not receive automatic notification of new companies, please inform them by email.

You can also find more information at the TRACES Help Desk (in English).

2.2 How many profiles does a company need? What if you are the first recipient and importer?

Each company needs only one company profile in TRACES. It is then possible to assign multiple “roles” (as first recipient or importer) to this profile. In addition, multiple employees can access the same company profile in TRACES. Please note that the first person assigned to the company in the registration process (cf. 2.1) automatically becomes the company administrator and can thus validate and manage all further person profiles. The additional employees no longer have to be registered with the competent authority. For more information on the different roles, see 2.6.

2.3 How do more employees get access to TRACES?

Every employee who should get their own access to TRACES needs their own EU login. Once they have this, the employee logs in to TRACES. After that, the employee now searches for his company under “Employer”, selects it by ticking the box, and clicks on “Request authorisation” in the upper right corner. The employee who registered the company with TRACES receives the request. As an administrator, they are authorised to accept or reject all new user requests regarding this company. They will find the requests under “Users” - “Search for pending requests”.

2.4 Do changes in the master data need to be revalidated?

Yes, any change in the master data of a company must be revalidated by the competent state organic authority. Therefore, please inform the EU organic authority responsible if you have made any changes, as your company profile can no longer be selected for a certificate of inspection until it is validated in TRACES.

2.5 Who creates the certificate of inspection in TRACES, when must it be issued by?

The issuing body and the body responsible for the issue is the third country inspection body or authority. However, the system introduces the options that exporters and importers can also prepare the certificate of inspection in TRACES and enter the information. All mandatory fields must then be filled in. The certificate of inspection is then forwarded internally in the system to the responsible inspection body/authority in the third country, which checks and confirms this information.

The COI must be issued by the third country inspection body or authority before the goods leave the exporting country. At this point, however, often not all information relevant for the COI is available. Therefore, the issuing third country control office or authority may adjust fields 13, 16 and 17, especially with regard to the quantity of information and the means of transport, within 10 days after the issuance of the COI, but in any case before clearance in the EU. If the deadline is not met, the goods cannot be imported into the EU as organic goods.

2.6 Who can add new producers, processors, or exporters in the third country to TRACES?

Such establishments and companies can be added by anyone who has access to TRACES and is allowed to create new certificates of inspection. However, once a third country producer, processor, or exporter has been established, it must first be validated and approved by the relevant third country organic inspection body.

2.7 What is the difference between an “organic importer” and an “organic operator”?

The main difference is that an organic importer can create a new certificate of inspection (COI) and appear on the COI as both an importer and a first recipient. A company that has only been validated as an organic operator can only be selected as a first recipient and has no authority to create a new COI.

If your company is registered as an organic importer, a second role as operator is not necessary. Technically, however, it is also possible to create both roles.

2.8 Is it possible to correct subsequently detected errors in the entry in TRACES?

Yes. It depends on which errors are involved.

There are several fields, namely 10 (see [Question 3.5](#)), 19, 20, 23, and 24 (see [Question 3.8](#).) which can also be corrected by the importer after the certificate of inspection has been issued. Correction of these fields does not require reissuance of the COI. Fields 13, 16 and 17 may also be amended by the third country organic inspection body within ten days of the issue of the COI and in any case before the competent authority has endorsed the COI (see [Question 2.5](#)).

If there is an error in one of the other fields, there is an option to replace the COI by way of reissue and thus correct these errors. In this case, the third country organic inspection body must reissue the COI. However, corrections of a purely typographical or editorial nature may be corrected without reissue.

2.9 Why can't the first recipient see the certificate of inspection after it is issued, even though he or she is named on it?

First recipients can only view the certificate of inspection in TRACES after it has been signed by the appropriate state authority. The reason for this is that the first recipient can still be changed after the release by the third country inspection office until at the latest before the release by the state authority.

2.10 Is it obligatory to upload the accompanying documents of the goods?

Yes, since 1 January 2022 the following documents accompanying the goods must be uploaded to TRACES: the commercial and transport documents such as the bill of lading, the invoices, and the packing list, and for bulk goods, the itinerary. Otherwise, the responsible state authority will pronounce a violation of the legal requirements upon release. Confidential details such as prices can be blacked out.

2.11 What happens if the system fails?

If TRACES is unavailable or even completely down, the certificate of inspection must be issued in paper form. In this case, the issuing body shall immediately inform the Commission and shall enter the data in TRACES after the system has been restored. These certificates and documents are then marked "created during a system failure".

3 Questions about the certificate of inspection

3.1 Field 1: Is it possible that field 1 and field 7 have different inspection bodies or authorities?

Yes, this is possible. Different bodies can be named in field 1 and 7. The body in field 7 is the body responsible for the inspections in the country of origin of the goods (cf. definitions of the fields in the annex of the sample of the certificate of inspection as well as Annex I and II of Regulation (EU) 2021/2325).

3.2 Does the body in field 1 also fill in fields 2 and 3 when IT fails (these fields are normally filled in automatically by the TRACES system)?

Yes. The body from field 1 then fills in all the required fields. In field 3 (number of the certificate of inspection), the issuing authority/inspection body enters its own consecutive number. As soon as TRACES is working again, the body from field 1 enters all data in the system and changes the number of the certificate of inspection retrospectively to the new number generated by TRACES.

3.3 Field 4: Who must be specified if the producer is not the processor and there is both a producer and a processor?

The company that carried out the last processing step must be indicated.

3.4 Field 6: If the exporter is purely a trader with no physical contact with the goods, does he not appear on the certificate of inspection at all?

Yes, that is correct. Regulation (EU) 2021/2306 has changed the format of the certificate of inspection. In field 6, companies without physical contact with goods are indicated. However, they have no insight into the document.

3.5 Field 10: What happens if the wrong customs authority/border inspection post is named on the COI?

The customs authority or border inspection post may be subsequently changed in the certificate of inspection. This can be done either by the body that issued the COI, the competent EU authority, or by the importer themselves. Note: The third country control point selects in advance in a drop-down menu in field 10 whether it is an official border control point or another customs point (point of release for free circulation). If a border inspection post was entered first, only other border inspection posts can also be selected, not other customs posts. In this case, the field must be deleted again and the entry made again.

Thus, no new COI needs to be requested for changes in field 10. As long as all other data on paper and in TRACES are identical, the certificate can be released by the relevant state organic authority.

3.6 Field 13: How can errors be avoided when entering CN codes?

The CN codes are stored in TRACES and are automatically selected by the system when the product is selected. The CN codes are kept up to date. Nevertheless, before importing, each importer should verify that the third country inspection body has selected the correct CN code.

3.7 Field 17: Is the information on the means of transport mandatory?

In field 17, information should be provided on the means of transport to the point of entry into the Union. In daily operations, this can lead to difficulties, as the information is often not yet available at the time the certificate of inspection is issued.

In TRACES, the information in field 17 is not marked with an asterisk and is therefore not mandatory. Upon request, the EU Commission has confirmed that the information is currently not mandatory. However, there may be changes here in the near future.

3.8 Field 24: Can the First Recipient be changed afterwards?

Yes, the First Recipient can still be changed by the importer even after the certificate of inspection has been issued and before it has been released by the state organic authority.

No new COI needs to be requested in this case. As long as all other data on paper and in TRACES are identical, the COI can be released by the appropriate state organic authority.

3.9 Field 24: Which address is to be entered if the first reception takes place at a company's premises?

The address mentioned on the organic certificate of the first recipient must be entered.

3.10 Field 24: After the certificate of inspection has been issued, is it still possible to change whether the goods are to be imported directly or divided into lots?

Yes, it is possible to change field 24 even after the certificate of inspection has been issued, but this must be done before it is approved by the relevant state authority.

3.11 Field 31: Does the first recipient need to sign only on paper or also be active in TRACES?

If a company carries out the initial reception of imported goods, it must confirm the initial receipt on the certificate of inspection.

The original can either be a paper version, in which case the initial receipt on paper must be confirmed by signature and electronically in TRACES. If the certificate of inspection has been e-sealed by the third country organic inspection body and the relevant state organic authority, then the electronic confirmation in TRACES is sufficient.

3.12 How do I create a partial certificate of inspection?

To be able to create a partial certificate of inspection, "Must be released in batches (basis for extract)" must be selected in the "First recipient" field (field 24) in the main certificate of inspection. After the goods have been released by the relevant country authority and confirmed in TRACES, the importer can access the main certificate of inspection in TRACES and click on "Create extract" at the bottom right. A new window will open with the partial certificate of inspection.

More information can be found on the FAQ page of the TRACES website.

3.13 What is the process when, in the case of a partial certificate of inspection, it is decided that parts of the goods will not be imported into the EU after all, but will be resold duty unpaid to the third country?

Since in this case the goods are not imported into the EU, they do not need to be listed further in TRACES.NT. Therefore, there is a function called "Used up" for certificates of inspection with the status "Statement basis". In this case, the importer must create partial certificates of inspection from the extract base (mother certificate of inspection) for all the quantities he wants to import into the EU. After that, the competent state organic authority can mark the remaining quantity as "Used up". This then completes the certification and no further partial certificates of inspection can be issued.

4 Other

4.1 What is the import processing from Switzerland?

When importing from Switzerland, a certificate of inspection is not required.

4.2 Is TRACES also used in Switzerland?

TRACES NT has also been mandatory for third country imports (imports from outside the EU) into Switzerland since 1 January 2019. However, the release in TRACES is not done by customs, but by the Swiss organic certification bodies. The importer informs his certification body of this release as soon as the goods have physically arrived on the territory of Switzerland. The release is then carried out in TRACES by the certification body.

However, due to the agricultural agreement between the EU and Switzerland, this only applies to goods imported into Switzerland from third countries outside the EU. TRACES NT does not have to be used for imports from the EU to Switzerland.

More information: www.bl-q.de, www.gfrs.de and www.frischeseminar.de.