

15th of May, 2015

EOCC feedback on the TRACES test-phase and recommendations for the future system for electronic certificates of imports

Several EOCC members have been involved in national tests for TRACES. EOCC set up a Platform on electronic certificates of imports in April 2015 in order to facilitate exchanges amongst these control bodies and with other EOCC members active in organic trade. The mission of this Platform was to prepare and draft an EOCC contribution to the European Commission providing feedback on the functioning of the test-phase and expressing control bodies' needs and suggestions for the definitive tool to be put in place.

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As the voice of about 50 control bodies and authorities in Europe and beyond, the *European Organic Certifiers Council* (EOCC) welcomes the project to set-up a tool for electronic certificates of imports at European level.

The test-phase allowed control bodies to detect difficulties and loopholes in the proposed system. There is certainly room for improvement to reach a tool which better suits CBs needs. EOCC would like to express its availability to work together with the European Commission on a more performant system, and believes that the ambition to put in place TRACES in the near future should be maintained.

For EOCC, electronic certification of imported organic products should aim at reaching the following objectives:

- Reducing the administrative burden for all operators, control bodies and authorities;
- Allowing in-real time issuance of certificates;
- Reaching a better traceability of organic products.

In order to reach these objectives, EOCC believes that the future system should be:

- Performant

EOCC underlines that the system for electronic certificates of imports should be performant, ie. quick and user-friendly.

First trials by control bodies have shown that the current system is very slow. This, combined with redundant boxes, implies that the human resources cost of using the

system is higher than it could and should be. EOCC expects the final system to be more rapid and consistent, and hopes that the support which will be put in place will be responsive.

EOCC supports the approach consisting of having a draft COI prepared by the importer and then completed and signed by the CB of the exporter on the basis of verifications of the documents sent by the exporter. It is important that operators are able to upload documentary evidence in TRACES, so that the system can be a real one-stop shop for issuance of certificates.

- Reliable

TRACES should be a guarantee for reliable certificates of imports. During the test-phase, it appeared for instance that it is possible for a CB to fill-in certificates for another CB, or to issue certificates for countries/categories for which it is not recognized.

For EOCC, a secured system requires that the EC should clarify the rights of each user to fill-in or consult documents, and that the rights of each individual user are precisely circumscribed. This would enable to enhance the reliability of issued certificates and to save time for TRACES users.

- Interoperable

Control bodies and control authorities already have performant tools to deal with certificates, some of them featuring numerous functions which are not available in TRACES, such as invoicing, issuing certificates of transaction for other standards, as NOP, or tools for managing stocks.

EOCC would therefore strongly recommend that TRACES is compatible and interoperable with existing systems at control body level. This would avoid overlaps and double-work. In addition, the extraction of data by CBs should be made possible for statistical purposes, including in the perspective of CB reporting.

- Extendable

EOCC would like to encourage the European Commission to work together with countries requiring certificates of exports in addition to certificates of inspection and having already a database to do it, such as India, in order to try to link their national systems with TRACES. This would further lower the administrative burden while increasing traceability.

Finally, EOCC believes that if TRACES proves to be an efficient tool, its extension to exports and thus issuance of certificates of transaction should be foreseen in the coming years.

Annex

Detailed remarks on the functioning of the system

EOCC members which had access to the TRACES test-phase of TRACES would like to draw the attention of the European Commission on following elements:

- Demands for clarifications

- EOCC would welcome a clear information on each users' rights to access, fill-in and consult TRACES, as well as information on the update of the system regarding the addition of new operators and products;
- CBs would welcome guidelines from the EC on how to fill-in the box on the origin of the products when it comes to products processed with ingredients from several origins;
- Regarding the "importer" access, EOCC would like that the EC clarifies who gives the certificate number.

- Undesirable options

- Possibility for a CB to fill-in a certificate for another CB should be removed;
- Possibility for a CB to issue a certificate for products from countries/categories it is not recognized for should be removed.

- Redundant options

- For EOCC, Boxes 6 and 7 overlap, and Box 6 could be therefore automatically filled-in;
- Box 8 (country of dispatch) could be automatically filled-in as it should match Box 5;
- Box 9 (country of destination) could be automatically filled-in from Box 10 (first consignee).

- Demands for additions

- EOCC stresses that it is important that national reference and country of origin appear on the final PDF certificate, which is currently not the case;
- EOCC would like the system to allow CBs to modify or cancel a certificate of inspection once signed, which is not possible now;
- For purposes of readability, the symbol signaling mandatory fields (*) could be deleted once the field filled-in.

- Varia

- After the update of the system, it was no longer possible to fill any information about the seal/container in Box 12;
- In this Box 13, only the CN code for the product and not the name of the product appears;
- Box 15: CBs reported that filling-in and signing of this box were impossible.