

## Trade Control and Expert System (TRACES)

The “TRACES” acronym stands for “**T**rade **C**ontrol and **E**xpert **S**ystem”.

The government of the European Union (EU) describes TRACES as:

“the European Commission's digital certification and management platform for all sanitary and phytosanitary requirements, supporting the importation of animals, animal products, food and feed of non-animal origin and plants into the European Union”

But for the purposes of this article: TRACES is the EU’s electronic Internet database related to the trade of animal and animal-origin commodities. Animal by-products must be produced and shipped from facilities listed on TRACES in order to be imported into the European Union (EU).

The EU requires facilities exporting animal by-products under Regulation (EC) 1069/2009 and its implementing regulation [Regulation (EU)142/2011 as amended] to be listed in TRACES. Any exceptions would be noted under the commodity specific articles available on the previous page.

**Exporters should have their importers confirm with the pertinent EU border control post (BCP) authorities that all requirements for entry of the consignment have been met prior to shipment.** This includes verifying that all necessary information (in the interpretation of the BCP related to the specific materials to be in the consignment) is posted on TRACES and that all required documentation (e.g. export certificates where required) is available and satisfactory to the BCP.

If a facility is recognized by APHIS as handling animal by-products in compliance with Regulation (EC) 1069/2009 and its implementing regulation [Regulation (EU) 142/2011 as amended], the information is generally automatically submitted to TRACES upon the recognition. However, exporters can check with their local APHIS Veterinary Services (VS) Service Center to confirm whether or not APHIS has submitted their information to TRACES. If a facility allows their recognition (sometimes called “eligibility” or “listing”) to expire, TRACES will be notified. Removal from TRACES can take several months, so merely being listed in TRACES does not verify any eligibility.

If a facility will not be referenced in any way on Regulation (EU) 142/2011 certificates (or other documents associated with import into the EU), they do not technically have to be on TRACES.

Please note: **The only assurance APHIS provides regarding exports are the specific declarations on certificates that are actually endorsed by APHIS.** (APHIS has an internal database that APHIS utilizes to determine which facilities are currently recognized for which activities and certificates related to the production and export of animal by-products to the EU.) Additionally, there will generally be a period of time between expiration of a facility’s recognition, and its delisting from TRACES. Listing on TRACES does **NOT** confirm any of the following:

- Any particular product from any facility meets any particular requirement;
- That APHIS will endorse any certificate;
- That any particular consignment will be allowed entry into the EU; or
- That a supplier has the necessary current recognition (sometimes called “approval”) to supply any particular product to U.S. facilities seeking recognition as in compliance with Regulation (EC) 1069/2009 and its implementing regulation Regulation (EU)142/2011.

The “live” information on “By-products” listings currently in TRACES is available on the EU’s website at:

<https://webgate.ec.europa.eu/tracesnt/directory/publication/establishment/index#!/search?sort=country.translation>

Once to this website, select “United States” for the “County” and then select the appropriate “section”.

**Advisory Regarding “Zip Codes” / “Postal Codes”:**

In December of 2021, the EU transitioned from one system in TRACES (“TRACES Classic”) to a new system in TRACES (“TRACES NT”). “Zip codes” (also known as “postal codes”) were not included on the public lists in TRACES Classic. The format of listings in TRACES NT changed, to sometimes include what may appear to be zip codes/postal codes (in the column entitled “city”). As of the publication of this article, most of the zip codes/ postal codes in TRACES NT are inaccurate. APHIS is working with EU authorities to address this issue. In the meantime, APHIS recommends that exporters not include the zip code/postal code in Section I.11 of certificates, as inconsistencies could cause rejection of consignments. If a zip code/postal code of any entity in the United States is included at any spot on certificates, it must be the accurate one (as indicated by the U.S. postal service).

**Section**

By-products facilities are listed in TRACES under the following sections:

	AKA “Number” of Section in Next Tables
ABP-SOIL Fertiliser and soil improvers	VIII
ABP-MP Dairy plants	II
ABP-GT Game trophies plants	VI

<b>ABP-FSE</b> Processing plants	<b>IV</b>
<b>ABP-COL</b> Other facility for the collection or handling of animal by-products (i.e. unprocessed/untreated materials)	<b>III</b>
<b>ABP-PET</b> Petfood plants (Including plants manufacturing dogchews and flavouring innards)	<b>V</b>
<b>ABP-IP</b> Plants or establishments manufacturing intermediate products	<b>VII</b>
<b>ABP-BBL</b> Blood and blood products, excluding of equidae, for technical purposes other than feed for animals	<b>X</b>
<b>ABP-DP</b> Storage of derived products	<b>IX</b>

Facilities with eligibility verified by other USG agencies would generally be added to TRACES via a different process (usually to other sections in TRACES). Facilities exporting other commodities should contact the agency responsible for certification of their exports if they have questions regarding TRACES.

The section a facility must be listed under is determined by the commodity, its intended use in the EU, and/or the certificate/document which is required for import to the EU. Based upon these and other factors, APHIS has developed the following table to indicate in which “section” (related to certificate to be endorsed), APHIS generally submits facilities to in TRACES. The content of this table is subject to change, and provides no guarantees. If a facility is not listed in the relevant section of TRACES, facilities should not export the commodity to the EU, nor seek APHIS endorsement of the pertinent certificates.

Certificate	SECTION IN TRACES
2A	II
2B	N/A
3A	V
3B	V
3C	V
3D	V
3E	V
3F	III
4A	III
4B	IV
4C	X
4D	X
5A	III
5B	IV
5C	N/A
6A	VI
6B	VI
7A	III
7B	N/A
8	III
9	N/A
11	IV
12	IV
13	N/A
14A	IV
14B	IV
15	N/A
16 IMPORTER DECLARATION	III
17	VIII
18	III
19 (photographic gelatin)	IV
20 (intermediate products)	VII
Beeswax (commercial document)	IV
Wool and hair (no certificate)	III
Treated feathers (commercial document)	III
“Warehouses” shipping all of the above except: 3D, 3F, 5A, 8, and 20	IX <sup>1</sup>

- The above referenced certificate numbers are from Regulation (EU) 142/2011. APHIS is still evaluating the potential for a verification process for some of these certificates.
- If a facility is not currently eligible for direct export, but could be eligible for the certificate if it were not for some “final” labeling type criteria, that Section is still utilized.
- Information in TRACES provides no guarantee regarding whether APHIS will endorse certificates or whether a particular item from a supplier meets certain criteria. The only assurances APHIS provides are the declarations included on certificates APHIS endorses.

<sup>1</sup> If this section is noted in TRACES, the warehouse facility reference number must be noted in section I.11 of the export certificate. The actual manufacturer must be listed in section I.28 of the certificate, and in TRACES under the relevant section for the specific commodity.