

Voluntary Report – Voluntary - Public Distribution

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Report Highlights:

The European Commission is digitizing a series of agri-food trade documents in their new electronic agricultural non-customs formalities system (ELAN). This report provides an overview of all U.S. documents the Commission has been considering in the context of ELAN. They support the trade of high-quality beef, citrus products, corn gluten meal, poultry, wholly milled or semi-milled rice, malting barley, wine, hops, wheat, and corn gluten feed. In the short term, the Certificates of Authenticity for high-quality beef required to access the EU's Tariff Rate Quotas will be impacted.

Introduction

This report provides an analysis of the U.S. certificates that will be impacted by the EU's transition to their new electronic agricultural non-customs formalities system (ELAN). Certificates currently provided in paper format will need to be produced directly in ELAN or transmitted to ELAN via national electronic systems. The U.S. certificates covered by ELAN result from historical bilateral engagements between the United States and the EU.

While the Commission's discussions concern U.S. certificates related to the export of high-quality beef, citrus products, corn gluten meal, poultry, wholly milled or semi-milled rice, malting barley, wine, hops, wheat and corn gluten feed, a concrete need for immediate engagement to avoid trade disruptions can only be identified for the Certificates of Authenticity for high-quality beef. These certificates are issued by the Food Safety Inspection Service (FSIS).

The high-quality beef certificates will be covered by the first phase of ELAN with a January 17, 2028, deadline. The first phase concerns certificates required for products imported under EU Tariff Rate Quotas (TRQs). The Commission will work on the digitization of several other trade related documents covered by EU agricultural regulations in a second phase of ELAN.

Agricultural TRQs Requiring a U.S. Issued Certificate

EU TRQs exist for an extensive list of agricultural products. Each TRQ is identified by a number. [Regulation \(EU\) 2020/761](#) concerns the management system of tariff quotas with licenses, while [Regulation \(EU\) 2020/1988](#) concerns the administration of import tariff quotas in accordance with the first come, first served principle. These two regulations provide the details for the management for each TRQ and, if applicable, specify the documents that must be provided by the third country that ships product under the quota.

Several TRQ's mentioned in those regulations require a U.S. issued certificate. Analysis of [Regulation \(EU\) 2025/1272](#) on ELAN and analysis of the historical fill rates of different TRQ's, indicates that the U.S. certificates linked to EU TRQs can be roughly divided in three groups:

- certificates that are commonly used in the current trading environment
- certificates linked to unused/underutilized TRQs, and
- certificates that are currently excluded from the scope of ELAN.

Certificates Commonly Used in the Current Trading Environment

Commodity Product	Supporting Documentation	EU Regulation	TRQ
Beef (Hilton Quota)	Certificate of Authenticity	2020/761	09.4002
Beef (High-Quality Beef (HQB) Quota)	Certificate of Authenticity	2020/1988	09.2203

Exporters of beef may be contacted by their importers about the transition to ELAN, as the Certificate of Authenticity for beef via the Hilton Beef Quota (09.4002) and the Certificate of Authenticity for beef via the High-Quality Beef Quota (09.2203) fall under the first phase of ELAN documents.

U.S. Readiness: FSIS is aware of the development of the ELAN system and has been in contact with the European Commission to look into options for compliance with the ELAN deadline applicable to the Certificates of Authenticity for beef.

Certificates Linked to Unused/Underutilized TRQ's

Commodity Product	Supporting Documentation	EU Regulation	TRQ
High-Quality Sweet Oranges	Certificate of Authenticity	2020/1988	09.0033
Citrus Hybrids known as Minneolas	Certificate of Authenticity	2020/1988	09.0027
Frozen Concentrated Orange Juice	Certificate of Authenticity	2020/1988	09.0025
Corn Gluten Meal	Certificate of Origin	2020/1988	09.0090
Poultry Meat	Certificate of Origin	2020/761 (Annex XII)	09.4169

Citrus products - The European Commission's [database](#) shows there have been no imports under TRQ 09.0025 and TRQ 09.0033 (data collection started in 2019), implying that no Certificate of Authenticity required to access these quota were issued. Imports under TRQ for minneolas (09.0027) were minimal. The origin of the small volumes under this quota which is open to imports from all third countries is not known. For further information, exporters can contact the Agricultural Marketing Service (AMS) at SCInspectionoperations@usda.gov.

Corn Gluten Meal - "Corn gluten" with TARIC code 2303 10 1110 can benefit from import under TRQ 09.0090. This product is commonly referred to as corn gluten meal. (*Comment: Product commonly referred to as corn gluten feed is classified in the EU under a different code*). Currently, the European Commission's [database](#) shows the quota for corn gluten meal has been unused in the past 5 years, implying that the related Certificates of Origin required to access the TRQ have not been issued. If a U.S. exporter intends to ship corn gluten meal to EU, the exporter will need to ensure the Certificate of Origin is compliant with the transition to digital documents under ELAN. FAS will continue to work

with interested parties on this as appropriate. The Russell Marine Group is the designated agent of the Louisiana Maritime Chamber of Commerce for the purpose of issuing the Certificate of Origin from the Port of New Orleans.

Poultry - The current use of the Certificate of Origin would create a short-term need for allocation of resources for the transition to digital documents under ELAN. However, the European Commission's [database](#) shows the quota has been unused in recent years (download data in the paragraph "TRQs" by clicking on "Imports"). This implies that the related Certificates of Origin required to access the TRQ have not been issued. An exporting company self-certification system for this certificate was developed after the TRQ was granted to the United States. FAS will continue to work with interested parties on this as appropriate.

Certificates that are currently excluded from the scope of ELAN

Commodity Product	Supporting Documentation	EU Regulation	TRQ
Wholly milled or semi-milled rice	Export Certificate	2020/761	09.4127
Malting barley	Certificate of Conformity	2020/1988	09.0076

The Export Certificate for wholly milled or semi-milled rice and the Certificate of Conformity for malting barley are required for access to the related EU quotas. However, Article 1.2.(b) of [Regulation \(EU\) 2025/1272](#) explicitly provides an exception for the transition to the ELAN digital format for these two documents at this stage.

Other Documents Covered by ELAN

The first phase of ELAN covers not only certificates by third countries, but also various documents issued by importing Member States such as import licenses.

In the second phase of ELAN, the Commission plans to proceed with other agri-food trade documents used for the exports of U.S. wine, hops, wheat and corn gluten feed. This includes U.S. certificates previously negotiated with the EU for these products. No formal dates have been specified for the implementation of this phase of ELAN.

Additional Information

For additional information, please visit the website of the European Commission ([ELAN - Agriculture and rural development - European Commission](#)).

Attachments:

No Attachments.