

# CertEX

CERTEX is the customs-to-TRACES electronic verification layer: when an import declaration is lodged, customs uses CERTEX to **automatically verify that the required TRACES NT documents (e.g., CHED references) exist and have the correct status** before goods can be released.

- What is “CertEX” and how does the system work?
- What does “write-off/consumption” of CHEDs / GGBs mean?
- What is the impact (aimed at the energy product)?
- Practical do’s & don’ts for trading/ops (where write-off issues often appear)
- “Best-effort standard” HS/CN list for commodities
- Detailed considerations
- Recourses

# What is “CertEX” and how does the system work?

In NL/EU day-to-day practice, people often use “CertEX” as an umbrella term for the **digital certificates/official controls workflow** around **(pre-)notification and border controls**. The core is:

- **TRACES NT** is the EU system where consignments that fall under SPS/official controls are **notified** using a **CHED**:
  - **CHED-P** (plants/plant products),
  - **CHED-A** (animals),
  - **CHED-PP** (products of animal origin / POAO),
  - **CHED-D** (certain goods / food & feed of non-animal origin, depending on the regime).
- In the Netherlands this is commonly referred to as **“GGB”** (Gemeenschappelijk Gezondheidsdocument bij Binnenkomst) — in practice the Dutch naming/handling of the **CHED** workflow.

## Process at a glance (end-to-end):

1. **Scope check**: does the commodity/consignment fall under EU “official controls” (phytosanitary, veterinary, high-risk FNAO, etc.)?
2. **Pre-notification**: importer/agent creates a **CHED/GGB** in TRACES NT and attaches:
  - consignment details (origin, destination, HS/commodity code, quantities, packaging),
  - documents (certificates, analyses, attestations),
  - logistics (BIP/BCP, ETA, container/vessel/flight data).
3. **Arrival & controls** by NVWA/BCP:
  - documentary check,
  - identity check,
  - (where applicable) physical check / sampling.
4. **Decision**: release / release with conditions / rejection / redirection / destruction / re-export.
5. **Downstream effect**: release is often a prerequisite for **customs clearance** and onward movement.

Important: a **CHED/GGB is consignment-based**, not “product-based”. You can’t use one CHED indefinitely for multiple physical shipments.

# What does “write-off/consumption” of CHEDs / GGBs mean?

- **partial deliveries** (splitting a lot),
- **partial clearance** or phased arrivals,
- mismatches between **commercial documents** (B/L, invoice, packing list) and **actual received quantity**,
- **re-allocation** due to repacking, blending, or resale before physical discharge.

## How it works (conceptually):

- The CHED/GGB contains a **declared quantity** (mass/units).
- Upon release, that quantity may be consumed in one go (fully written off), or (depending on regime/configuration) **partly** used, leaving a **remaining balance** still open.
- Authorities/systems ensure you **cannot release/move more** than what was approved under that CHED/GGB.

## Why this exists:

- To prevent one approval (one CHED) from being used to “pull through” **multiple consignments** or extra volumes.
- For traceability and risk control (especially for SPS/high-risk goods).

## Typical pain points:

- If the CHED is for “1,000 MT” but you want to release 1,050 MT (due to weighing differences or B/L tolerance), you can get blocked and may need a **correction/amendment** or separate handling.
- If you want to split a cargo across multiple consignees/warehouses, the administrative chain (and sometimes the CHED structure) must support that.

# What is the impact (aimed at the energy product)?

Because the energy products sector is broad, the impact is **highly product- and route-dependent**. There are 3 relevant groups.

## A) “Mainstream” energy products (crude, gasoline, diesel, jet, fuel oil, naphtha, LNG/LPG)

**Usually no CHED/GGB** is required, because these typically do **not** fall under SPS/official controls (veterinary/phytosanitary/food/feed).

**Impact is then indirect:**

- If a cargo is combined with **regulated co-loads** (rare) or there is a regulated element in the chain, it can still create operational delays.
- If terminals/warehouses also process SPS flows, there can be **congestion/slot effects**.

## B) Biofuels & feedstocks/agri components (UCO, tallow, certain residues, blends into HVO/FAME chains)

Here CHED/GGB **can** be relevant depending on classification:

- Is it a fat/oil (incl. waste) that can be considered **feed** or **food**?
- Is it an **animal by-product (ABP)** or subject to veterinary controls?
- Is the intended use within the EU considered part of the food/feed chain?

**Business impact:**

- **Demurrage/laytime risk:** if pre-notification is not tight or documents don't match, you may get a hold on release → waiting time.
- **Contractual risk:** who is responsible for CHED/GGB, documentation, and costs in case of hold/rejection (Incoterms and contract clauses)?
- **Loss of flexibility:** “quickly” rerouting to another EU port or changing consignee can be constrained by:
  - the BCP/entry point in the CHED,
  - the named importer/consignee,
  - quantities already (partly) “written off”.

## C) Food/feed of non-animal origin with elevated risk (e.g., certain oils/seeds/ingredients)

If Vitol (or an affiliate) trades/imports these: CHED-D/CHED-PP can apply in specific regimes (increased controls, contaminants, etc.).

### **Business impact:**

- **Planning:** lead times must include BCP capacity, sampling turnaround, and release time.
- **Cost:** additional costs for inspections, lab tests, handling, storage.
- **Reputation/compliance:** non-compliance can escalate quickly (rejection/alerts).

# Practical do's & don'ts for trading/ops (where write-off issues often appear)

## Do's

- Ensure **quantities** (B/L/manifest vs CHED) are realistic and aligned with tolerance policy. Customs systems are known to have not implemented these tolerances in their system. To raise with Vemobin/NCO-NCW industry associations.
- In contracts, explicitly define:
  - who files the CHED/GGB,
  - who pays sampling/inspection/storage,
  - what happens under partial release or rejection.
- If splitting is expected: design the **administrative chain** upfront (single consignee vs multiple; warehousing; resale before/after customs clearance).

## Don'ts

- Don't try to "fix" the CHED/GGB only upon arrival; for SPS goods **pre-notification timing** is often strict.
- Don't assume you can freely reallocate volumes once part of a consignment has been released/"written off".

# “Best-effort standard” HS/CN list for commodities

## Quick “screening rule” (practical)

- **Ch. 27 (2709/2710/2711) → CHED/GGB usually No**
- **Ch. 15 (1502, 1511-1514, 1518) and Ch. 12 (oilseeds) → CHED/GGB often Depends/Yes**
- **2207 (ethanol), 3826 (biodiesel) → Depends** (fuel vs food/feed/ABP chain)

Below is a **best-effort list of EU Combined Nomenclature (CN) commodity code headings / common subheadings** that will *likely* apply to the products mentioned under **A, B, and C**. Focusing on the **CN level (8 digits where reasonably standard)** and keeping it practical for trading/ops screening.

“ Important: **CHED/GGB (and what you called “CertEX consideration”)** is **not determined by the CN code alone**. It depends on whether the goods fall under **SPS/official controls** (food/feed/ABP/plant health, “high-risk” regimes, etc.), plus origin/intended use. So: CN codes below tell you “what it is”; CHED tells you “whether it’s controlled”.

## A) Mainstream energy products (typically **CHED/GGB: No**)

### Crude oil

- **2709 00** — Petroleum oils and oils obtained from bituminous minerals, **crude**

# Refined petroleum products (broad umbrella used for many products)

- **2710** — Petroleum oils (other than crude) / preparations / waste oils

## Gas oil / diesel (common CN ranges)

- **2710 19 43 - 2710 19 48** — Gas oils (often used as diesel/gasoil band in EU references)  
(Note: exact 8-digit depends on sulphur band / spec.)

## Jet fuel / kerosene

- **2710 19 21** — Jet fuel
- **2710 19 25** — Other kerosene  
(Both explicitly referenced as kerosene CN codes)

## Heavy fuel oil

- **2710 19 62 - 2710 19 68** — Heavy fuel oil band used in EU references

## LPG / petroleum gases

- **2711 12** — Liquefied: propane
- **2711 13** — Liquefied: butanes
- **2711 12 11 - 2711 19 00** — LPG band referenced in EU taxation tables

**CHED/GGB expectation for A:** generally **No** (not SPS/food/feed).

## B) Biofuels & feedstocks (often **CHED/GGB: Depends**)

# Denatured ethanol (fuel blending / industrial)

- **2207 20 00** — Ethyl alcohol, denatured, of any strength
- (Also relevant heading: **2207 10** for undenatured  $\geq 80\%$  vol, but in fuels the denatured line is common.)

# Biodiesel / FAME / biodiesel blends (broad HS/CN heading)

- **3826 00** — Biodiesel and mixtures thereof (biodiesel heading at HS level; CN splits exist underneath)

# Tallow (animal fats)

- **1502 10** — Tallow (CN sub-splits exist beneath; used widely for tallow)

# “UCO / waste oils” (best-effort—classification varies a lot)

- Often ends up under **Chapter 15** (animal/vegetable fats & oils) or “chemically modified / inedible mixtures” categories.
- A commonly encountered bucket for chemically modified/inedible mixtures is **1518 00** (note: exact CN depends on product description and lab properties).

**CHED/GGB expectation for B: Depends**, and this is where most surprises happen:

- If it's treated as **food/feed** or **animal by-product (ABP)** related, or under a **high-risk** regime → CHED/GGB can become **Yes**.
- If it's clearly an **industrial fuel component** with no SPS relevance → often **No**, but you still need to confirm case-by-case.

# C) Food/feed of non-animal origin with elevated controls (often **CHED/GGB: Yes/Depends**)

You didn't name specific products in C earlier (only "certain oils/seeds/ingredients"), so here are the **most typical CN families** that come up for edible oils / oilseeds that can be subject to official controls depending on origin/risk regimes:

## Vegetable oils (examples)

- **1507** — Soya-bean oil
- **1508** — Groundnut oil
- **1511** — Palm oil
- **1512** — Sunflower/safflower/cotton-seed oil
- **1513** — Coconut (copra), palm kernel or babassu oil
- **1514** — Rapeseed/colza/mustard oil  
(Exact 8-digit depends on crude/refined/fractions.)

## Oilseeds (examples)

- **1201** — Soybeans
- **1205** — Rapeseed/colza seed
- **1206** — Sunflower seed
- **1207** — Other oil seeds and oleaginous fruits

**CHED/GGB expectation for C:** commonly **Yes/Depends** because food/feed items can fall under:

- mandatory pre-notification regimes for certain origins/commodities,
- increased controls (contaminants, residues, etc.).

(Again: whether CHED is required is not "because of the CN code", but because of the **regulatory status** of that commodity/origin/use.)

# Detailed considerations

## A) Mainstream energy products (typical **CHED/GGB consideration: NO**)

Product family	Likely EU CN / HS headings	CHED/GGB (CertEX consideration)
Crude oil	2709 00 (petroleum oils, crude)	No (not SPS/food/feed)
Refined petroleum products (broad bucket)	2710 (petroleum oils other than crude; preparations; etc.)	No
Jet / kerosene	Typically under 2710; common EU references include 2710 19 21 (jet fuel) and 2710 19 25 (other kerosene)	No
LPG / petroleum gases (propane/butane etc.)	2711 (petroleum gases and other gaseous hydrocarbons; incl. liquefied propane/butanes)	No

(These are energy products; in normal cases they do not fall under CHED categories.)

## B) Biofuels & feedstocks (typical **CHED/GGB consideration: DEPENDS**)

Product family	Likely EU CN / HS headings	CHED/GGB (CertEX consideration)	Why "depends"
----------------	----------------------------	---------------------------------	---------------

<b>Biodiesel / FAME / biodiesel blends</b>	<b>3826 00</b> (biodiesel and mixtures)	<b>Depends</b>	Generally industrial/energy, but classification & controls can be affected by documentation/intended use and any specific EU measures.
<b>Denatured ethanol (fuel ethanol)</b>	<b>2207 20 00</b> (denatured ethyl alcohol)	<b>Depends (often No)</b>	Usually not CHED, but if consignment is treated within food/feed controls or special regimes, checks can differ.
<b>Tallow / animal fats</b>	<b>1502</b> (tallow)	<b>Depends (often Yes if ABP-related)</b>	Can fall into <b>animal by-product / veterinary</b> logic depending on grade/intended use and accompanying certification.
<b>Used cooking oil (UCO) / inedible mixed oils</b>	Frequently screens under <b>1518 00</b> (inedible mixtures/preparations of animal/vegetable fats/oils; chemically modified; etc.)	<b>Depends (often Yes)</b>	UCO is explicitly discussed in SPS contexts as HS <b>1518</b> in trade/SPS notifications; whether CHED applies depends on the specific control regime and use.

**Practical takeaway for B:** for **UCO (1518)** and **tallow (1502)** you should treat CHED/GGB as a **live risk** until proven otherwise for that exact cargo (origin, documentation, intended use, importer status, BCP requirements).

## C) Food/feed of non-animal origin (typical **CHED/GGB** **consideration: YES / DEPENDS**)

These are the common CN families for **vegetable oils and oilseeds** (often used in food/feed chains, and therefore most likely to interact with “official controls” workflows, potentially via **CHED-D** depending on specific risk lists and origin).

<b>Product family</b>	<b>Likely EU CN / HS headings</b>	<b>CHED/GGB (CertEX consideration)</b>
<b>Vegetable oils (edible / crude/refined variants)</b>	<b>1507</b> (soybean oil), <b>1511</b> (palm oil), <b>1512</b> (sunflower/cottonseed etc.), <b>1513</b> (coconut/palm kernel), <b>1514</b> (rapeseed/colza/mustard)	<b>Yes/Depends</b>

Product family	Likely EU CN / HS headings	CHED/GGB (CertEX consideration)
<b>Oilseeds</b>	<b>1201</b> (soybeans), <b>1205</b> (rapeseed/colza), <b>1206</b> (sunflower), <b>1207</b> (other oil seeds/oleaginous fruits)	<b>Yes/Depends</b>

# Recources

[The EU Single Window Environment for Customs - Taxation and Customs Union](#)