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IMPLEMENTATION AND TRANSITIONAL APPLICATION OF THE EUROPEAN UNION'S ELECTRONIC SYSTEM FOR AGRICULTURAL NON-CUSTOMS FORMALITIES (ELAN)

COMMUNICATION BY THE EUROPEAN UNION

The following communication, dated 29 May 2026, is being circulated at the request of the delegation of the European Union. The European Union (EU) wishes to inform WTO Members of the **implementation and transitional application of its Electronic System for Agricultural Non-Customs Formalities (ELAN)**. ELAN, as a key component of the EU Single Window Environment for Customs¹, aims to streamline customs controls for existing documents necessary for trade in agricultural products, in order to reduce processing times and ultimately facilitate trade in agricultural products.

1 ELAN IN THE EU SINGLE WINDOW ENVIRONMENT FOR CUSTOMS

1.1. In 2022, the European Union, in an effort to modernise its customs procedures, launched the **EU Single Window Environment for Customs (EU CSW)**, with the aim to improve information sharing and digital cooperation between customs administrations and other government authorities in charge of enforcing non-customs formalities at the EU borders in areas such as health and safety, environmental protection, food and product safety, agriculture, etc. The EU CSW streamlines the electronic exchange of documents required for the goods clearance process by interconnecting the import, export and transit systems of EU member States with Union non-customs systems that manage non-customs formalities.

1.2. As part of the EU CSW, the **Electronic System for Agricultural Non-Customs Formalities (ELAN)** represents a targeted digital solution specifically designed to streamline and digitize the issuance, management and verification of documents for the import of agricultural products into the EU. While the EU CSW covers a broad range of trade formalities, ELAN focuses exclusively on the digitisation of non-customs documents required for agricultural imports, such as **import and export licences, certificates of non-preferential origin, certificates of authenticity, certificates of eligibility and on Inward Monitoring Arrangements certificates (IMA1)**.

1.3. ELAN integrates seamlessly with the EU CSW to replace manual, paper-based processes with a fully **electronic** system. This transition automates data validation, enables real-time information exchange between EU and non-EU country authorities, and reduces processing times for agricultural imports into EU. Importantly, **ELAN does not require any additional documents** beyond those mandated by existing EU legislation. Its sole purpose is to digitise and simplify the submission, verification, and management of documents that traders are already requested to provide.

2 NON-CUSTOMS FORMALITIES FOR AGRICULTURAL IMPORTS AND THE ROLE OF ELAN

2.1. In the context of agricultural trade, **non-customs formalities** refer to the regulatory documents and certificates required by importing countries in addition to standard customs declarations. These documents serve critical purposes, such as verifying the origin, or eligibility of

¹ https://taxation-customs.ec.europa.eu/customs/customs-controls/eu-single-window-environment-customs_en.

certain agricultural products under specific trade regimes. Non-customs formalities are not optional; they are legally mandated under EU legislation.

2.2. **At present**, non-customs formalities for agricultural imports into the EU are managed through a decentralised and largely manual system. Traders or their representatives have to physically submit paper documents (such as certificates issued by competent authorities in third countries) to EU customs or other regulatory agencies at the border. These documents are then manually verified, a process that can be time-consuming and prone to human error. In some cases, authorities may request additional clarifications or resubmissions, further delaying the release of goods.

2.3. ELAN revolutionises the handling of non-customs formalities **by fully digitising the submission, validation, and processing of agricultural import documents**. Under ELAN, the competent authorities of EU member States and non-EU countries will be able to issue, upload, or communicate electronic versions of the required documents directly into the system. These documents will then be automatically validated against EU regulatory requirements, with real-time feedback on any discrepancies or missing information. As ELAN does not introduce any new requirements in terms of documents to be submitted, the agricultural goods will need to be accompanied by the same documents that are already required today under existing EU legislation. The only change is the format: instead of paper, these documents must be submitted electronically through ELAN.

3 OPERATION OF ELAN

3.1. ELAN is governed by two key legal instruments: **Delegated Regulation (EU) 2025/1269**² and **Implementing Regulation (EU) 2025/1272**³, which establish the legal framework, technical specifications, and operational procedures for its use. To ensure a smooth transition, the EU has adopted a phased implementation approach, allowing traders and third-country authorities sufficient time to adapt to the new electronic requirements.

3.2. Recognising the operational challenges that some trading partners may face in transitioning to a fully electronic system, the EU has established an adequate **transitional period**. During this time, documents issued by non-EU countries may continue to be submitted in paper format and presented physically at EU customs **until 16 January 2028**. This flexibility is designed to give third-country authorities and businesses ample opportunity to upgrade their systems, train personnel, and ensure full compatibility with ELAN's technical requirements.

3.3. **From 17 January 2028**, the submission of electronic documents through **ELAN will become mandatory** for all international trade in agricultural goods. After this date, paper documents will no longer be accepted for the formalities covered by ELAN, except in duly justified exceptional circumstances. The legal basis for this transitional period is set out in **Articles 72a–72d of Implementing Regulation (EU) 2020/761**⁴, which provide detailed rules on the acceptance of paper documents during the transition and the conditions for moving to mandatory electronic submission. These provisions ensure that the shift to ELAN is gradual, predictable, and fair for all trading partners.

3.4. For further legal and technical details, trading partners are encouraged to consult the following **EU regulations**, which have been **duly notified** to the WTO in accordance with transparency obligations:

- **Delegated Regulation (EU) 2025/1269**, notified as [G/LIC/N/2/EU/30](#);
- **Implementing Regulation (EU) 2025/1272**, notified as [G/LIC/N/2/EU/32](#);
- **Implementing Regulation (EU) 2020/761 (Articles 72a–72d)**.

² http://data.europa.eu/eli/reg_del/2025/1269/oj.

³ http://data.europa.eu/eli/reg_impl/2025/1272/oj.

⁴ http://data.europa.eu/eli/reg_impl/2020/761/oj.

4 ELAN IMPLEMENTATION FOR THE EU'S TRADING PARTNERS' AUTHORITIES

4.1 The Role of Third-Country Authorities in ELAN

4.1. A **significant number** of the non-customs documents required for agricultural imports into the EU are **issued by competent authorities in third countries**. The smooth functioning of ELAN therefore depends critically on the active cooperation of these authorities, as they will be responsible for generating or transmitting electronic versions of these documents through the ELAN system.

4.2. To avoid any disruption to agricultural trade flows, the EU strongly encourages all trading partners to engage proactively with ELAN during the transitional period. Early adoption will not only prevent last-minute challenges, but also allow authorities and businesses to fully benefit from the system's advantages, such as faster processing, reduced administrative costs, and greater predictability in customs clearance. A **full list of the documents** issued by third-country authorities that fall within the scope of ELAN is provided in **Section 5** of this communication.

4.2 Familiarisation with ELAN's Operational and Technical Requirements

4.3. The first essential step for third-country authorities is to familiarise themselves with ELAN's operational and technical requirements. The EU has developed a **dedicated portal** (<https://agriculture.ec.europa.eu/elan>), which provides **comprehensive guidance**, including:

- **Detailed explanations** of how ELAN works;
- **Step-by-step instructions** for registering authorities and submitting documents;
- **Technical specifications** for electronic documents (e.g., **data formats, electronic signatures**);
- **Frequently Asked Questions (FAQs)** and **troubleshooting resources**.

4.4. In addition to the online portal, the EU **plans to organise webinars and training sessions** tailored to the needs of non-EU authorities and businesses. These sessions will cover **key aspects** such as:

- **Data formats** (e.g., XML schemas for certificates);
- **Electronic signature standards** (e.g., compliance with the **EU's eIDAS Regulation** or equivalent international standards);
- **System integration** (e.g., how to link third-country certification systems with ELAN).

4.5. Trading partners are strongly advised to monitor the ELAN portal for updates on these capacity-building opportunities and to participate actively to ensure their readiness for the 2028 mandatory deadline.

4.3 Assessing Compatibility with ELAN's Technical Specifications

4.6. An important **preparatory step** for third-country authorities is to **assess the compatibility** of their **existing electronic certification systems** with ELAN's technical requirements. This involves verifying that:

- **Electronic documents** meet ELAN's **structured data formats** (e.g., XML);
- **Electronic signatures** comply with **EU eIDAS standards** or **internationally recognised equivalents** (such as those under the **United Nations Commission on International Trade Law (UNCITRAL) Model Law on Electronic Signatures**);
- **Data transmission protocols** align with ELAN's **security and interoperability standards**.

4.7. Authorities that currently **lack electronic certification systems** are encouraged to **develop or upgrade** their infrastructure to meet ELAN's requirements. The EU stands ready to provide technical assistance where needed, particularly for developing countries that may face resource constraints. Early engagement with ELAN's technical team can help identify potential gaps and mitigation strategies well before the 2028 deadline.

4.4 Registering with ELAN and Engaging with the EU Commission

4.8. To **formally engage** with ELAN, third-country authorities responsible for issuing the relevant documents **must register** in the system. Registration can be initiated by completing the **dedicated forms** available at the following link: <https://circabc.europa.eu/ui/group/f01dc0b7-af6e-463d-b72c-9b05764481e8/library/ab38f76c-e623-45a5-bf2f-094ce415aa8a>.

4.9. Once completed, these forms should be **submitted through the relevant EU Delegation or Embassy** to the **functional mailbox**: AGRI-SINGLE-WINDOW@ec.europa.eu. The EU Commission will then validate the registration and provide the necessary access credentials and technical support to ensure a smooth onboarding process.

4.10. For **any questions** related to ELAN, trading partners are invited to **contact the EU Commission's ELAN team** directly at the same email address: AGRI-SINGLE-WINDOW@ec.europa.eu. The EU is fully committed to providing timely and practical assistance to all trading partners to minimise disruptions and maximise the benefits of the new system.

5 LIST OF DOCUMENTS ISSUED BY TRADING PARTNER AUTHORITIES FALLING WITHIN THE SCOPE OF ELAN

5.1. The following is a **comprehensive list** of the **non-customs documents** issued by third-country authorities that fall within the scope of ELAN. These documents **must be submitted electronically** through ELAN **from 17 January 2028**:

- **Certificates of authenticity** for beef tariff rate quotas (TRQs)⁵, including those for high-quality or protected products (e.g., TRQ order numbers **09.4001, 09.4002, 09.4451, 09.4453, 09.4454, etc.**);
- **Authenticity certificates** for rice (e.g., TRQ order number **09.4731** for Viet Nam and Basmati rice under **Delegated Regulation (EU) 2023/2835**);
- **Inward Monitoring Arrangement (IMA1) certificates** for dairy products (e.g., TRQ order numbers **09.4521, 09.4523, 09.4525**);
- **Certificates of eligibility** for various agricultural products under preferential tariff regimes;
- **Export licences and certificates** for products such as rice, sugar, and poultry (e.g., TRQ order numbers **09.4128, 09.4324, 09.4211, etc.**);
- **Certificates of origin** for non-preferential imports under specific TRQs (e.g., **09.4317, 09.4329, 09.4915** for sugar, garlic, poultry, and other products);
- **Documents issued by third countries** as provided for in **Article 31(5) of Implementing Regulation (EU) 2020/1988**.

5.2. For a full **and legally binding list** of the documents concerned, trading partners should refer to the **relevant EU regulations** cited in **Section 3.** of this communication.

⁵ Specific TRQ order numbers relating to relevant EU's WTO quotas are indicated in the notes column of the latest EU Market Access MA:2 notification for Marketing Year 2024/2025 : [Accessible here](#).

6 CONCLUSION

6.1. The European Union is **firmly committed to facilitating trade** in agricultural products while maintaining the **highest standards** of food safety, animal health, and environmental protection. The Electronic System for Agricultural Non-Customs Formalities (ELAN) represents a major step forward in this endeavour by digitising and streamlining the submission of documents necessary for trade in agricultural products, reducing processing times, and enhancing transparency for all stakeholders.

6.2. The EU **reiterates** that ELAN **does not impose any new requirements in terms of documents to be submitted** - it simply modernises the submission process for documents that traders are already requested to provide. This aligns fully with the WTO Trade Facilitation Agreement (TFA), which encourages the use of digital tools to simplify and expedite trade procedures. By adopting ELAN, the EU is leading by example in implementing efficient, predictable, and trade-conducive customs and border procedures.

6.3. The EU **strongly encourages** all WTO Members and trading partners to **engage proactively** with ELAN during the **transitional period**, which runs until **16 January 2028**. Failure to adapt to ELAN by the 2028 deadline could result in delays or rejections of shipments of agricultural products at EU borders. Early familiarisation, compatibility assessments, and registration will minimise the risk of disruptions and ensure that operators can continue to trade smoothly with the EU. The EU stands ready to provide support, guidance, and technical assistance to all partners to facilitate this transition.

6.4. The EU **looks forward to continuing its constructive dialogue** with WTO Members and trading partners to ensure the **successful implementation of ELAN**. By working together, we can strengthen global agricultural trade, and promote a more efficient, transparent, and resilient trading system for the benefit of all.
