**EC Certificates of Origin - Foreign Evidence**

**Best Practice Guide to Evidence Declaration Visit**

**Introduction**

In certain industries it becomes virtually impossible to operate standard certification procedures in relation to the supply of foreign evidence due to the complex supply chain these organisations operate, having many product lines and importing goods from all over the world.

The most common arrangement made is for bulk evidence to be lodged with the issuing body to cover certifications granted over a period, however in exceptional cases a special arrangement may be established when the amount of foreign evidence is so extensive it may not be practical to lodge with the issuing body. This will apply to a very few organisations nationwide and should be discussed with a member of the CG Group before allowing an exporter to use an evidence declaration.

This involves the exporter providing the issuing body with a complete list of all manufacturers along with an ‘Evidence Declaration’. The exporter will be responsible for ensuring the evidence list is kept updated and agree to the issuing body visiting their premises to examine evidence on a regular basis (at least annually) to assess their system for declaring origin.

**Evidence Visit Procedure**

* **Is the exporter a suitable candidate to use an “Evidence Declaration”?**
  1. Does the exporter export a significantly high number of product lines?
  2. Does the exporters export sale comprise of goods imported from many overseas destinations?
* **Pre-visit** 
  1. Ensure that the exporter has key personnel available who can provide you with information and demonstration of the following:
     + 1. Purchasing procedures
       2. Import & Export procedures
       3. Systems and procedures for tracking origins and manufacturers for product lines
       4. Supporting documents relating to origin and manufacturers
* **During Visit**

1. Ensure that meeting notes are taken, including the process
2. Explain the reason for the visit and the procedure required when submitting EC Certificate of Origin with an evidence declaration.
3. Obtain a copy of a recent export invoice (In exceptional circumstances the exporter can be sent notification of the invoice/ invoices to be checked), which can be used for following the audit trail of several product lines to determine origin and manufacturer.
4. Using the export invoice, select 3-5 foreign origin products line, and ask exporters to walk how the origin and manufacture is identified as well as supporting evidence of origin.

Dependant on the organisation this may be:

* 1. Tracked back from the export sale to import source / purchase
  2. Tracked from import source / purchase to export sale

1. As part of the process It would be usual practice for the exporter to demonstrate their SAP system (sales, application and products).
2. During this audit the exporter must demonstrate that their process is robust enough to ensure the origin and manufacturers stated on the Certificate of Origin applications are correct.
3. During the demonstration the Issuing Body must make notes of the process used to hold as a record of the visit.
4. The exporter must be informed that they must supply the Issuing Body with full manufacturers list including the product line (s) and origin (s). In many cases this will be a data file, such as an Excel spreadsheet. This list must be updated on a regular basis, the frequency of this would be dependent on the frequency the exporters sources new manufacturers, but it must be updated at least once a year.
5. Any areas of weakness in the process – can be discussed with the exporter, with the aim of finding a solution which will ensure compliance with the Evidence Declaration process. These solutions will probably need to be agreed and implemented post meeting.

The visit also provides an opportunity for the exporter & the Issuing Body to raise any other questions / issues there may be in relation to the certification process or any other trade related issue.

* **Post Visit**
  1. If approval for an “Evidence Declaration” is granted before EC Certificates of Origin applications can be accepted without supporting evidence for foreign origin the exporter must provide:
     1. A signed Evidence Declaration on their letterhead.
     2. A full “master” manufacturers list indicating the product line(s) and origin(s).
     3. A copy of the evidence declaration has to be submitted to the BCC.
* **On Application**
  1. On application for a Certificate of Origin the applicant must:
     1. Annotate the back of the “pink” application to state Evidence Declaration held by the Chamber of Commerce
     2. Annotate the back of the “pink” application Include a list of the relevant manufacturers of the product lines being shipped or if supplied on a separate document (annotated with the Certificate of Origin number) if too many to insert onto the application.
  2. When checking the application, the Issuing Body must:
     1. face-check as usual
     2. check the origin and manufacturers against the master manufacturers list.
     3. If any origins are wrong against those shown on the master list or manufacturers not shown on the master list then applicant must advise the Issuing body and if necessary supply additional back up evidence as support

Should an Issuing Body have any question relating to Evidence Declarations and or need assistance with this please contact Paul Wrighting at BCC or any members of the Certification Group.