# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS-P6\_0296** (JIRA: UCCNCTSP6-222) |
| **Related Incident ID** | **N/A** |
| **RFC Initiator / Organization** | **DG TAXUD IT** |
| **CI** | **NCTS-P6 (DDNTA-6.3.0-v1.00 – CSE-v60.4.4)** |
| **Type of Change** | **Standard**  **Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | |  | |
| **RFC Source** | |  |  | | --- | --- | | **Legal & Policy Change**  **Organisational Changes** | **Business Change**  **IT Change** | |
| **Review by Business User recommended?** | **Yes  No** |

***Change Summary***

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| **NCTS-P6 (DDNTA-6.3.0-v1.00 - CSE-v60.4.4): Preventing the violation of C3014 in ICS2-CR, ensuring that combined declarations do not mix containerised and non-containerised goods items in the same House Consignment.** |
| In NCTS, a declaration may include - for a given HOUSE CONSIGNMENT - both **containerised goods** and **non-containerised goods**. In ICS2-CFSS-v2.04, the declarant can only declare **either containerised goods** or **non-containerised goods** for a given HOUSE CONSIGNMENT (i.e. but not at the same time containerised and non-containerised goods).  Consequently, a new rule should be introduced in DDNTA-6.3.0-v1.00, attached to the DG ‘TRANSPORT EQUIPEMENT\GOODS REFERENCE’ to prevent the mix of containerised and non-containerised goods items in the same House Consignment in a transit declaration combined with ENS. |

**Section 2: Problem statement**

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| In **DDNTA-6.3.0-v1.0.0** (based on CSE-v60.4.4), the Holder of Transit Procedure can lodge a **CCA15D** to an Office of Departure being in an **Opt-in NA**, including the container information under D.G. ‘TRANSPORT EQUIPMENT’, as shown below:      According to C0823, D.G. ‘TRANSPORT EQUIPMENT’ is required when the D.I. ‘Container indicator’ under the D.G. ‘CONSIGNMENT’ has value ‘1’, otherwise it can be optional or not used.    Moreover, according to guideline G0670 if goods are not related to a single container, they must be declared under D.G. ‘TRANSPORT EQUIPMENT\GOODS REFERENCE’.    Based on the above, a combined transit declaration is possible to include goods in the same ‘HOUSE CONSIGNMENT’ that are both **containerised** and **non-containerised**.  However, based on **ICS2-CFSS-v2.04**, the ENS filings **IE4F50**, **IE4F51** and **IE4F34** have a dedicated condition **C3014** applied on D.G. ‘TRANSPORT EQUIPMENT’, dictating that this D.G. will be **always required** when the D.I. ‘Container indicator’ has value ‘1’. In addition, the D.G. ‘TRANSPORT EQUIPMENT’ is declared differently in ICS2 (either at House Consignment or Goods Item Level) to indicate which goods are included in each container.  **Extract from IE4F51**      Due to this constraint existing in ICS2, the combined transit declaration used by Opt-in NAs in NCTS-P6 should be updated to also prevent that one ‘HOUSE CONSIGNMENT’ includes a mix of containerised and non-containerised goods items.  Therefore, for all declared goods items in one House Consignment, in case the ‘Container indicator’ has value ‘1’ and the transit declaration is combined with ENS (i.e. Specific circumstance indicator is either ‘F50’, ‘F51’, or ‘F34’), then the declared goods items must be listed under the Data Group /\*/Consignment/TransportEquipment/GoodsReference. This can include all items in the same transport equipment (same container) or in different transport equipment (different containers). |

**Section 3: Description of proposed solution**

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| **DDNTA-6.3.0-v1.0.0 (incl. Appendix Q2)** and **CSE-v60.4.4**, shall be corrected as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~):  A new rule **R0010** shall be attached under D.G. **‘Consignment/TransportEquipment/GoodsReference’** in CCA15D, CCA13D, CDA15D, CDA13D, CCA29D and CC170C (applicable to **Opt-in NAs only**) as shown below:  **Extract from CCA15D**  ------ADDITIONAL SUPPLY CHAIN ACTOR 99x O G0825  R0040  ---------SAFETY AND SECURITY IDENTIFICATION NUMBER 1x D C0938  ------TRANSPORT EQUIPMENT 9999x D C0823  G0103    ---------SEAL 99x D C0569  ---------GOODS REFERENCE 9999x D C0670  G0670  **R0010**  The wording of the new **R0010** will be the following:  **R0010**  **Technical Description:**  IF /\*/Consignment/containerIndicator is EQUAL to '1' AND  /\*/TransitOperation/specificCircumstanceIndicator is in SET {F50, F51}  THEN each iteration of /\*/Consignment/TransportEquipment must contain /\*/Consignment/HouseConsignment/ConsignmentItem from the same /\*/Consignment/HouseConsignment  **Functional Description:**  IF <CONSIGNMENT.Container indicator> is EQUAL to '1' AND  <TRANSIT OPERATION.Specific circumstance indicator> is in SET {F50, F51}  THEN each iteration of < CONSIGNMENT - TRANSPORT EQUIPMENT> must contain <CONSIGNMENT - HOUSE CONSIGNMENT – CONSIGNMENT ITEM> from the same <CONSIGNMENT - HOUSE CONSIGNMENT>  **In Appendix K:**  **For the external domain messages**   |  |  |  | | --- | --- | --- | | **TMS Path** | **Validated by Sender** | **Validated by Recipient** | | **Consignment/Transport Equipment/Goods Reference** | **-** | **-** |   **For the common domain messages**   |  |  |  | | --- | --- | --- | | **TMS Path** | **Validated by Sender** | **Validated by Recipient** | | **Consignment/Transport Equipment/Goods Reference** | **R** | **R** |   **In SDEV-NCTS-P6\_DMP 6.3.0 (NCTS-P6 to ICS2 Data Mapping)** file:   * New rule **R0010** will be added to the following tabs:   + IE4F50-CDA15D   + IE4F51-CDA15D   + IE4A50-CDA13D   + IE4A51-CDA13D     **IMPACT ASSESSMENT:**  This RFC-Proposal concerns changes in both Common and External Domain messages applicable for the **Opt-In NAs only**. It is proposed to be implemented **before the start of the NCTS-P6 operations (T-Ops)** to avoid message rejections by ICS2-CR.  **Proposed** date of applicability in Operations (**T-Ops**):   Start of P6 operations (at earliest 01.03.2025, at latest 01.09.2025)  **Proposed** date of applicability in CT (**T-CT):**                    Start of CT campaign (provisionally on 01.12.2024)  **Expected** date of approval by ECCG (**T-CAB**):                 Together with DDNTA-6.4.0  **Risk in case of non-implementation:**  Possible message rejections and Transit Declarations combined with ENS Particulars will not be released for transit, in case of not implementing the proposed changes.  **Impacted messages:**   * Common Domain: CDA13D, CDA15D * External Domain: CCA13D, CCA15D, CCA29D and CC170C   **Impacted Rules, Conditions & BRTs etc.:**   * R0010 (New)   **Impacted CI Artefacts:**   * DDNTA-6.3.0-v1.00 (Main Document): Νο. * Functional Specifications NCTS-P6 (FSS/BPM): 7.10.0: No. * **CSE-v60.4.4: Yes**. * **DDNTA-6.3.0-v1.00 (Appendices ‘K’, ‘D’, ‘Q2’ and ‘P’):** **Yes.** * **NCTS-P6 DMP-6.3.0-v1.00 Package: Yes.** * **CTP-6.2.0-v1.00: Yes.** * **TRP-6.2.0-v1.01:** **Yes.** * DDCOM-21-3.0-v1.00: No. * ieCA/TED 2.0.0.0: No. * **ICS2-CR-CTS-1.1.0-v1.01: Yes.** * **ICS2-CR-CRP-1.1.0-v1.00: Yes.** * CS/MIS2\_DATA: No. * CS/RD2\_DATA: No. * UCC IA/DA Annex B: No. |

**Impact on CI artefacts**

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| **DDNTA-6.3.0-v1.00**  **(Appendices)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Appendices ‘K’, ‘D’, ‘Q2’ and ‘P’ to be updated as a new rule is introduced, as described in Section 3.** | |
| **CSE-v60.4.4** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **CSE shall be updated with the new rule, as described in Section 3.** | |
| **NCTS-P6 DMP-6.3.0-v1.00 Package** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **DMP package shall be adapted as a new rule is added, as described in Section 3.** | |
| **ICS2-CR-CTS-1.1.0-v1.01 & ICS2-CR-CRP-1.1.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **ICS2 CR CTS & CRP will be updated due to the new Rule as described in Section 3.** | |
| **CTP-6.2.0-v1.00 & TRP-6.2.0-v1.01** | Cosmetic Low  Medium  High  Very High   |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | | **Impact in Drools due to the introduction of a new rule. Alignment of messages according to the updates of specifications.**   |  |  |  | | --- | --- | --- | | **Update TC (Partially Passed or Failed if NA not aligned):** | **No** |  | | **Deleted Test Cases:** | **No** |  | | **New Test Cases:** | **Yes** | **For new rule R0010** | | **Updated Drools:** | **Yes** | **For new rule R0010** | | **Other:** | **No** |  | | |

**Estimated impact on National Project**

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| Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Impact to be assessed by each NA wishing to be Opt-in in NCTS-P6. | |

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| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFT-DEV | 14/03/2024 | Draft by SOFT-DEV |
| v0.11 | Commented draft | 25/03/2024 | Major comments by DG TAXUD IT (tds). |
| v0.20 | Comments implemented by SOFT-DEV | 05/04/2024 | Major comments implemented |
| v0.21 | Commented draft | 17/06/2024 | Comments by DG TAXUD IT (tds) with TC. Some comments resolved. |
| v0.30 | SfR to DG TAXUD | 26/06/2024 | *Version implementing DG TAXUD’s comments* |
| v1.00 | SfA to DG TAXUD | 15/07/2024 | *Final version implementing DG TAXUD’s comments* |
| v1.01 | SfA-NPM\_IMPL | 18/12/2024 | *Watermark and Document history (status) updated for info \_ Part of RFC-List.42 \_ Included in DDNTA-6.4.0-v2.00.* |