# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS-P6\_0304** (UCCNCTSP6-292) |
| **Related Incident ID** | **IM774691 / KE25036** |
| **RFC Initiator / Organization** | **DG TAXUD IT** |
| **CI** | **NCTS-P6 (DDNTA-6.4.0-v1.02 – CSE-v60.4.8)** |
| **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-6.4.0-v1.02 – CSE-v60.4.8): Corrections in the wording of BRTs: B1820, B1823, B1836, B1896, B1922 and replacement of B1941 and B1942 with B1968** |
| Updates to the technical descriptions of several BRTs are needed, as their wording does not align with version **DDNTA\_APP\_Q2-5.15.2-v2.00** of **NCTS-P5**, and alignment with RFC-List.41\_NCTS\_0273 (replacement of B1941 and B1942 with B1968). |

**Section 2: Problem statement**

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| In **DDNTA-6.4.0-v1.02** based on **CSE-v60.4.8,** the following issues for several BRTs have been identified:   1. **The wording of B1820, B1823, B1836, B1896, and B1922 is not aligned to the definitions provided in DDNTA-5.15.2-v2.00 (Appendix Q2).**   To prevent potential business continuity issues for movements already accepted and released - at the latest on 20.01.2025 - by NTA.P4 & NTA.P5, the technical descriptions of BRTs should be identical in DDNTAs for NCTS-P5 and NCTS-P6. Those discrepancies between DDNTA-5.15.2-v2.00 (for NCTS-P5) and DDNTA-6.4.0-v1.02 (for NCTS-P6) resulted from an incorrect implementation in NCTS-P6, not from documented RFCs for DDNTA of NCTS-P6.   1. **The BRTs B1941 and B1942 introduced in DDNTA-6.4.0 (**via the **RFC-List.42\_NCTS\_0280) are redundant and should be replaced by the BRT B1968 existing for NCTS-P5 (as defined in RFC-List.41\_NCTS\_0273).**   The BRT **B1968** has been introduced in NCTS-P5 in the **CD018C** message with the **RFC-List.41\_NCTS\_0273** (see *RFC-List.41\_NCTS\_0273\_IAR-UCCNCTS-4391(SfA-NPM)-v2.01.docx*) as illustrated in the below image.    The **DDNTA-6.4.0-v1.02** erroneously includes **B1941** and **B1942 (both referring to the NCTS P5/P6 Transition Period)** introduced via the **RFC-List.42\_NCTS\_0280**. Nevertheless, the **CD018C** in the DDNTA for NCTS-P6 should keep the BRT B1968 for business continuity reasons.  Therefore, the **DDNTA-6.4.0-v1.02** should be corrected to remove the **B1941** and **B1942,** replacing them with the **B1968** (in accordance with **RFC-List.41\_NCTS\_0273)**.  Based on **DDNTA 6.4.0-v1.02,** the wordings of the **B1941 and B1942** are as follows: |

**Section 3: Description of proposed solution**

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| The **DDNTA v6.4.0-1.02 (incl. Appendix Q2) and the CSE-v60.4.8** shall be corrected as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~ ):   1. **Fixing unexpected typos / divergences in BRTs** (getting the NCTS-P6-wording back aligned to NCTS-P5-wording):   **Appendix Q2:**   1. **B1820** has been updated in DDNTA-5.15.1-v1.00 based on RFC-List.37\_NCTS#0191. This RFC-Proposal had no business continuity issues. It aimed to optimize the Conformance Testing campaigns. It could be deployed in PROD in a flexible way.  Even if this B1820 was de-activated in ieCA(PROD) and in NTAs (NCTS-P5) in operations to avoid rejections on the Common Domain, it is required to be documented that when developing the NTA.P6, the national teams do NOT need to modify the B1820 already existing in NCTS-P5 (So far, DDNTA-6.4.0-v1.02 was not aligned to DDNTA-5.15.1-v1.00 (same B1820 in DDNTA-5.15.2-v2.00)).   DDNTA-5.15.2-v2.00:    DDNTA-6.4.0-v1.02:    **🡪** To ensure business continuity (for declarations already released before TPendDate)**,** the **DDNTA-6.4.0-v2.00** shall include the following correction for **B1820**:  **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN  IF /\*/Consignment/countryOfDestination is in SET CL009  THEN IF /\*/Consignment/Consignee is PRESENT  THEN /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "N"  ELSE /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "R"  ELSE IF /\*/Consignment/HouseConsignment/ConsignmentItem/countryOfDestination is in SET  CL009  THEN THIS /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "R"  ELSE IF /\*/TransitOperation/security is in SET {0,1}  THEN IF /\*/Consignment/Consignee is PRESENT  THEN /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "N"  ELSE /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "O"  ELSE IF at least one instance of /\*/Consignment/AdditionalInformation/code is EQUAL to '30600'  THEN  ~~/\*/Consignment/Consignee = "N" AND~~  /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "N"  ELSE IF at least one instance of  /\*/Consignment/HouseConsignment/ConsignmentItem/AdditionalInformation/code is EQUAL to '30600'  THEN  ~~THIS /\*/Consignment/Consignee = "N" AND~~  THIS /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "N"  ELSE IF /\*/Consignment/Consignee is PRESENT  THEN /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "N"  ELSE /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "R"  **Functional Description:**  N/A   1. Similarly, **B1823** has been updated in DDNTA-5.15.1-v1.00 based on RFC-List.37\_NCTS#0191, but the DDNTA-6.4.0-v1.02 is not aligned to it.   DDNTA-5.15.2-v2.00:    DDNTA-6.4.0-v1.02:    **🡪** To ensure business continuity (for declarations already released before TPendDate) and to avoid unnecessary development by National Teams**,** the **DDNTA-6.4.0-v2.00** shall include the following correction for **B1823**:  **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN C0001 shall be disabled AND  IF /\*/Consignment/countryOfDestination is in SET CL009  THEN  **IF at least one /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee is present**  **THEN /\*/Consignment/Consignee = "N"**  **ELSE /\*/Consignment/Consignee = "R"**  **ELSE IF /\*/TransitOperation/security is in SET {2,3}**  **THEN**  **IF at least one instance of**  **/\*/Consignment/HouseConsignment/ConsignmentItem/AdditionalInformation/code  is EQUAL to '30600'**  **THEN /\*/Consignment/Consignee = "N"**  **ELSE /\*/Consignment/Consignee = "O"**  ~~IF /\*/Consignment/Consignee is PRESENT~~  ~~THEN /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "N"~~  ~~ELSE /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "R"~~  ~~IF /\*/Consignment/Consignee is PRESENT~~  ~~THEN /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "N"~~  ~~ELSE /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "R"~~  ~~ELSE IF /\*/Consignment/HouseConsignment/ConsignmentItem/countryOfDestination is in SET CL009~~  ~~THEN THIS /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "R"~~  ~~ELSE IF /\*/TransitOperation/security is in SET {0,1}~~  ~~THEN IF /\*/Consignment/Consignee is PRESENT~~  ~~THEN /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "N"~~  ~~ELSE /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "O"~~  ~~ELSE IF at least one instance of /\*/Consignment/AdditionalInformation/code is EQUAL to '30600'~~  ~~THEN /\*/Consignment/Consignee = "N" AND~~  ~~/\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "N"~~  ~~ELSE IF at least one instance of~~  ~~/\*/Consignment/HouseConsignment/ConsignmentItem/AdditionalInformation/code is EQUAL to '30600'~~  ~~THEN THIS /\*/Consignment/Consignee = "N" AND~~  ~~THIS /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "N"~~  ~~ELSE IF /\*/Consignment/Consignee is PRESENT~~  ~~THEN /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "N"~~  ~~ELSE /\*/Consignment/HouseConsignment/ConsignmentItem/Consignee = "R"~~  **Functional Description:**  N/A   1. **B1836** will be corrected to get the wording identical in DDNTA-5.15.2-v2.00 and in DDNTA-6.4.0-v2.00:   DDNTA-5.15.2-v2.00:    DDNTA-6.4.0-v1.02:    **🡪** To ensure business continuity (for declarations already released before TPendDate)**,** the **DDNTA-6.4.0-v2.00** shall include the following correction for **B1836**:  **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN C0030 shall be disabled  AND  IF /\*/TransitOperation/declarationType is EQUAL to ‘TIR’  THEN /\*/CustomsOfficeOfTransitDeclared = "N"  ELSE  IF the first two characters of /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL112  OR the first two characters of /\*/CustomsOfficeOfDestinationDeclared/referenceNumber is in SET CL112  OR /\*/TransitOperation/declarationType is ~~in SET {T2, T}~~**EQUAL to ‘T2’**  **OR (/\*/TransitOperation/declarationType is EQUAL to 'T' AND at least one instance of**  **/\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is EQUAL to 'T2')**  THEN /\*/CustomsOfficeOfTransitDeclared = "R"  ELSE /\*/CustomsOfficeOfTransitDeclared = “O”  **Functional Description:**  N/A   1. **B1896** will be corrected to get the wording identical in DDNTA-5.15.2-v2.00 and in DDNTA-6.4.0-v2.00:   DDNTA-5.15.2-v2.00:    DDNTA-6.4.0-v1.02:    **DDNTA-6.4.0-v2.00** shall include the following correction for **B1896**:  **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN  IF /\*/TransitOperation/security is in SET {1, **2,** 3}  THEN  IF /\*/Consignment/referenceNumberUCR is NOT PRESENT AND  /\*/Consignment/HouseConsignment/ConsignmentItem/referenceNumberUCR is NOT PRESENT AND  /\*/TransitOperation/declarationType is NOT EQUAL to ‘TIR’  THEN/\*/Consignment/HouseConsignment/ConsignmentItem[1]/TransportDocument = ''R''  ELSE /\*/Consignment/HouseConsignment/ConsignmentItem/TransportDocument = ''O''  **Functional Description:**  N/A   1. **B1922** will be corrected as follows to align with DDNTA\_APP\_Q2-5.15.2-v2.00, as discrepancies resulted from implementation errors in DDNTA P6:   DDNTA-5.15.2-v2.00:    DDNTA-6.4.0-v1.02:    **DDNTA-6.4.0-v2.00** shall include the following correction for **B1922**:  **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN R0601 will be disabled AND  ~~IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-ADDITIONAL~~  ~~REFERENCE.Type> is in SET CL234 (DocumentTypeExcise)~~  ~~(i.e. Export of excise goods followed by transit (EMCS&AES+NCTS))~~  ~~THEN~~  ~~IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM.Declaration~~  ~~type> is PRESENT~~  ~~THEN (<CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM.Declaration~~  ~~type> is EQUAL to ‘T1’~~  ~~AND <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-~~  ~~PREVIOUS DOCUMENT.Type> is EQUAL to 'N830')~~  ~~ELSE (<TRANSIT OPERATION.Declaration type> is in SET {T1, TIR}~~  ~~AND <CONSIGNMENT-HOUSE CONSIGNMENT-PREVIOUS DOCUMENT.Type> is~~  ~~EQUAL to ‘N830’);~~  ~~ELSE IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-SUPPORTING~~  ~~DOCUMENT.Type> is in SET CL234 (DocumentTypeExcise)~~  ~~(i.e. Transit movement of EU goods under excise suspension (EMCS+NCTS))~~  ~~THEN~~  ~~IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM.Declaration~~  ~~type> is PRESENT~~  ~~THEN <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT~~  ~~ITEM.Declaration type> is in SET {T2, T2F}~~  ~~ELSE <TRANSIT OPERATION.Declaration type> is in SET {T2, T2F}~~ **IF /\*/Consignment/HouseConsingment/ConsignmentItem/AdditionalReference/type is in SET CL234**  **(DocumentTypeExcise) (i.e. Export of excise goods followed by transit (EMCS&AES+NCTS))**  **THEN**  **IF /\*/Consignment/HouseConsignment/ConsignmentItem/PreviousDocument/type is EQUAL to ‘N830’**  **THEN**  **IF /\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is PRESENT**  **THEN /\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is EQUAL to ‘T1’**  **ELSE /\*/TransitOperation/declarationType is in SET {T1,TIR}**  **ELSE // no further constraints on ‘Declaration type’ data items**  **ELSE**  **IF /\*/Consignment/HouseConsignment/ConsignmentItem/SupportingDocument/type is in SET CL234(DocumentTypeExcise) (i.e. Transit movement of EU goods under excise suspension (EMCS+NCTS))**  **THEN**  **IF /\*/Consignment/HouseConsignment/ConsignmentItem/SupportingDocument/type is PRESENT**  **THEN /\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is in SET {T2, T2F}**  **ELSE /\*/TransitOperation/declarationType is in SET {T2, T2F}**  **Functional Description:**  N/A  **Appendix D:**  It will be updated by adding a new version for the wording of the BRTs for NCTS-P6 of **B1836**, **B1820**, **B1823**, **B1922**, and **B1896**.  **Appendix P:**  It will include the updated wording of the BRTs **B1836**, **B1820**, **B1823**, **B1922** and **B1896.**  **Appendix X:** No impact.   1. The DDNTA-6.4.0-v1.02 shall be corrected for the **CD018C** to remove the B1941 and B1942 and replace them with the B1968 as specified below:   **Appendix Q2:**   * **CD018C/Consignment/TransportEquipment/GoodsReference/declarationGoodsItemNumber**  |  |  |  |  | | --- | --- | --- | --- | | ---------GOODS REFERENCE |  |  |  | | Sequence number | R | n..5 | R0054 | | Declaration goods item number | O | n..5 | ~~B1941~~  **B1968**  G0005  G0006  G0360 |  * **CD018C/Consignment/ CountryOfRoutingOfConsignment/Country**  |  |  |  |  | | --- | --- | --- | --- | | ------COUNTRY OF ROUTING OF CONSIGNMENT |  |  |  | | Sequence number | R | n..5 | R0054 | | Country | O | a2 | CL008 ~~B1942~~  **B1968** |   With **B1968** wording (as defined in RFC-List.41\_NCTS\_0273\_IAR-UCCNCTS-4391(SfA-NPM)-v2.01.docx) being:  **Technical Description:**  **IF <Decisive Date> is LESS than or EQUAL to <TPendDate>**  **THEN /CD018C/Consignment/TransportEquipment/GoodsReference/declarationGoodsItemNumber="R";**  **IF <Decisive Date> is LESS than or EQUAL to <TPendDate>**  **THEN /CD018C/Consignment/CountryOfRoutingOfConsignment/Country="R"**  **Functional Description:**  **N/A**  **Appendix K:** It will be updated for **B1968 / CD018C**, as follows:   |  |  |  | | --- | --- | --- | | **TMS Path** | **Validated By Sender** | **Validated By Recipient** | | **MESSAGE / CONSIGNMENT / TRANSPORT EQUIPMENT / GOODS REFERENCE.Declaration goods item number** | **R** | **SR** | | **MESSAGE / CONSIGNMENT / COUNTRY OF ROUTING OF CONSIGNMENT.Country** | **R** | **SR** |   **Appendix D:**  It will be updated by   * adding the BRT B1968 for NCTS-P6, * marking **B1941** & **B1942** as deleted.   **Appendix P:**  The BRTs **B1941** & **B1942** will be replaced by **B1968**.  **Appendix X:**  The BRTs **B1941** & **B1942** will be replaced by **B1968** in ‘*CD018C-RuleMappings.xml*’.  **IMPACT ASSESSMENT:**  This RFC-Proposal is **primarily documentary**. It aims to offer business continuity during the start of NCTS-P6.  **Proposed** date of applicability in Operations (**T-Ops**):   Before the start of NCTS-P6 operations by each NA.  **Proposed** date of applicability in CT (**T-CT**):                     To be defined.  **Expected** date of approval by ECCG (**T-CAB**):                  Together with the approval of DDNTA-6.4.0-v2.00(SfA).  **Risk in case of non-implementation:**  If the proposed changes are not applied, there will be rejections (and blocked transit movements) between the National Transit Application (NTA) aligned to **DDNTA-6.4.0-v1.02** and the NTA align with **DDNTA-5.15.2-v2.00**+**RFC-List.41\_NCTS\_0273**.  **Impacted messages:**   * **Common Domain:** CD003C, CD038C, CD115C, CD165C and CD018C. * **Please note that the TRTs & BRTs for the External Domain messages are not specified in DDNTA, except for CC015C and CC013C.**   **Impacted Rules, Conditions & BRTs etc.:**   * **Updated wording of BRTs**: B1820, B1823, B1836, B1896, and B1922 * **New BRT replacing existing BRTs**: B1968 replacing B1941 and B1942   **Impacted CI Artefacts:**   * DDNTA-6.4.0-v1.02 (Main Document): Νο. * Functional Specifications NCTS-P6 (FSS/BPM): 8.0: No. * **CSE-v60.4.8: Yes.** * **DDNTA-6.4.0-v1.02** **(Appendices ‘D’, ‘Q2’, ‘K’, ‘P’ and ‘X’):** **Yes.** * NCTS-P6 DMP-6.4.0-v1.00 Package: No. * CTP-6.3.0-v1.00: No. * **TRP-6.3.0-v1.00: Yes**. * DDCOM-21-4.0-v1.00: No. * ieCA/TED 2.0.0.1: No. * ICS2-CR- CTS -1.2.0-v1.00: No. * **ICS2-CR-CRP-1.2.0-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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| **CSE-v60.4.8** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Update the BRTs as described in section 3.** | |
| **DDNTA-6.4.0-v1.02** (Appendices **‘D’, ‘Q2’, ‘K’, ‘P’ and ‘X’**) | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Update the BRTs as described in section 3.** | |
| **TRP-6.3.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | | |  |  |  | | --- | --- | --- | | **Update TC (Partially Passed or Failed if NA not aligned):** | **Yes** | Minor updates on the erroneous data sets that test these modified BRTs. | | **Deleted Test Cases:** | **None** |  | | **New Test Cases:** | **None** |  | | **Updated DROOLS:** | **Yes** | Updated DROOLS to reflect revised wording in the BRTs and replaced two BRTs with another BRT. | | **Other:** | **None** |  | | |
| **ICS2-CR-CTS-1.2.0-v1.00** | Cosmetic Low  Medium  High  Very High   |  | | --- | | Updated XSDs to be included in CTS Package. | |
| **ICS2-CR-CRP-1.2.0-v1.00** | Cosmetic Low  Medium  High  Very High   |  | | --- | | Updated CTS packages will be incorporated in the new CRP. | |

**Estimated impact on National Project**

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| NoneCosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | The estimated impact is the same for OPT-OUT countries and for OPT-IN countries.  This RFC-Proposal is **primarily documentary** and concerns several corrections of BRTs that **may** have implementation impact **for both Opt-In and Opt-Out NAs**, **in case the countries have already implemented based the wording of BRTs defined in the DDNTA 6.4.0-v1.02**. However, there is **no implementation impact for those NAs** whose National Transit Application is aligned to the **DDNTA 5.15.2-v2.00** and the **RFC-List.41\_NCTS\_0273** before joining NCTS-P6**.**  A review by National Teams is recommended to ensure accuracy and consistency. | |

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| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by CUSTDEV | 15/11/2024 | *Draft by CUSTDEV* |
| v0.11 | Draft commented | 20/11/2024 | *Various corrections and improvements by DG TAXUD IT (tds)* |
| v0.12 | Draft by CUSTDEV | 20/12/2024 | *Implementing the comments provided by DG TAXUD* |
| v0.13 | Draft upgraded & commented | 05/12/2024 | *Various corrections and improvements by DG TAXUD IT (tds)* |
| v0.14 | Draft upgraded | 08/12/2024 | *Filename changed – TC removed and various small improvements by DG TAXUD IT (tds)* |
| v0.15 | Draft by CUSTDEV | 10/12/2024 | *Implementing the comments provided by DG TAXUD* |
| v1.00 | SfA-NPM\_IMPL | 18/12/2024 | *Implemented in DDNTA-6.4.0-v2.00* |