# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_DDCOM\_0026** (RTC-59131) |
| **Related Incident ID** | IM470930 |
| **RFC Initiator / Organization** | NA-BE & DG TAXUD/B3 |
| **CI** | DDCOM 20.3.0-v1.00 |
| **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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| **DDCOM-20.3.0-v1.00: Validation of the “Trader Identification number” during Transitional Period** |
| One of the main conclusion of the ieCA Real Time Exercise is the need to relax the XSD used for the TIN validation during the Transitional Period. It seems also helpful to specify in DDCOM how the Customs Administrations of the EU Member States shall validate the Trader Identification Number used in the customs declarations. |

**Section 2: Problem statement**

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| The DDCOM does not define precisely how the TIN (EORI or TCUIN) must be validated by EU Member States.  The ieCA Real Time Exercise highlighted the need to relax the XSD pattern applied during the upgrade of the legacy messages, to avoid the rejections based on TINs that are valid as per DDNxA Appendix Q2 but are not valid as per DDNxA Appendix X (this appendix X is only strongly recommended in the legacy DDNxA). |

**Section 3: Description of proposed solution**

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| The following updates will be performed into the **DDCOM-20.3.0-v1.00** (added text in yellow).  **V.8 Identification Number Structure**  The Identification number used for Trader identification in the context of AES-P1 and NCTS-P5 has the following format by XSD definition.   |  | | --- | | <xs:simpleType name=**"TINNewType"**>  <xs:annotation>  <xs:documentation>EORI or TCUI Number (format:  an..17)</xs:documentation>  </xs:annotation>  <xs:restriction base=**"AlphaNumType"**>  <xs:minLength value=**"3"**/>  <xs:maxLength value=**"17"**/>  <xs:pattern value=**"[A-Z]{2}[!-~]{1,15}"**/>  </xs:restriction>  </xs:simpleType> |   Table 53: XSD definition of *TINNewtype* simple type  The applicability of this XSD pattern to **specific data elements** in **specific messages** is defined in DDNXA [R40] and DDNTA [R41]. Trader Identification Number should follow the EOS specifications [R23] since after the end of the Transitional Period, where a valid EORI number needs to be provided for specific data elements.  The first 2 characters must be capital alphabetic characters restricted from A to Z, while the minimum length is 3 characters and the maximum is 17 characters. Whitespaces are not allowed by XSD definition (also not allowed by EOS).  In order to enable the transition, a relaxed XSD Pattern is also defined:   |  |  |  | | --- | --- | --- | |  | <xs:simpleType name=**"** **TINRelaxedType"**>  <xs:annotation>  <xs:documentation>Trader Identification Number (format: an..17) compatible with Legacy Specifications for EDIFACT messages, as per DDNxA Appendix Q2</xs:documentation>  </xs:annotation>  <xs:restriction base=**"AlphaNumType"**>  <xs:minLength value=**"1"**/>  <xs:maxLength value=**"17"**/>  </xs:restriction>  </xs:simpleType> |  |   Table 54: XSD definition of *TINRelaxedType* simple type  The applicability of this XSD pattern to **specific data elements** in **specific messages** is also defined in DDNXA [R40] and DDNTA [R41].  The National Administration located in the EU shall validate the EORI or TCUIN *(Third Country Unique Identifier Number = TIN of the AEO located in a country with Mutual Recognition Agreement (MRA))* used as the Trader Identification Number of various actors (e.g. Carrier, Declarant) of the customs declaration.  The validation of the EORI and TCUIN shall be performed against EOS (through the CRS application).  The CTC countries having no access to the EOS database via the CRS application, should use the web service available via DDS2 page on the europa.eu website (see the [wsdl available on europa.eu](https://ec.europa.eu/taxation_customs/dds2/eos/validation/services/validation?wsdl)) to verify if the EORI is valid.    **VI. EDIFACT message formatting**  (…)  **Impacted CI artefacts**:   1. DDCOM 20.3.0-v1.00: **Yes** 2. ieCA/CRP5.5.0-v1.00: **Yes**   **IMPACT ASSESSMENT:**  **No impact on External Domain**  This RFC-Proposal enables the conversion (UPGRADE) without rejections due to TIN.In the legacy DDNTA-v20.00 (NCTS-P4) and DDNXA-v11.00 (ECS-P2) the XSD pattern is stricter than the format defined in Appendix Q2, stricter than what is applied in operations. Consequently, it is required to relax also the XSD Pattern during the Transitional Period, to be used by the ieCA convertor and by any country not using the ieCA application.  This change has no impact on the legacy application (considering that no rejections are visible in CS/MIS), considering that no TIN-related rejections are observed in NCTS-P4 / ECS-P2 operations.  This change will be applied immediately by the ieCA to avoid the TIN-related rejections observed during the ieCA Real Time Exercise.  **Proposed** date of applicability in Operations (T-Ops): As soon as published (**for ieCA & other convertor**)  **Proposed** date of applicability in CT (T-CT): As soon as possible, at latest by Jul-2022  **Expected** date of approval by ECCG (T-CAB): January 2022  **Impact on transition Legacy/To-Be:** Yes - Key enabler !  **Consequence of not approving the RFC-Proposal**:   * The explanation for TCUIN & validation using CRS might be unavailable to the National Development teams, leaving some possible source for confusion. * The changes in ieCA/CRP cannot be applied (or the changes is ieCA/CRP are applied without alignment to the agreed specifications) and a significant number of legacy messages will be rejected in Production during the upgrade by ieCA.   **Impact in case of no Implementation:** many rejections will be observed when validating messages after their upgrade, if using non-relaxed XSD. |

**Impact on CI artefacts**

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| DDCOM 20.3.0-v1.00 | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Updates as described in section 3. | |
| ieCA/CRP-5.5.0-v1.00 | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Update of the XSD pattern used for the validation of the Trader Identification Numbers in all messages. | |

**Estimated impact on National Project**

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| Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **If using the ieCA convertor:** no impact(maybe an update of the translated DDCOM, if any)**.**  **If not using the ieCA:** impact to be assessed by each NA. The XSD pattern used for TIN needs to be verified/updated, to avoid any rejection during the upgrade. | |

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| **Document History** | | |  |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by CUSTDEV | 30/11/2021 |  |
| v0.11 | Update by DG TAXUD | 06/12/2021 |  |
| v0.12 | SfR to NPMs | 13/12/2021 |  |
| v1.00 | SfA to NPMs | 03/02/2022 | *Implementing comments #18 from DE.* |