# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0199** (JIRA:UCCNCTS-2609) |
| **Related Incident ID** | **N/A / PM24953 / KE22896** |
| **RFC Initiator / Organization** | **NA-DE** |
| **CI** | **NCTS-P5 (DDNTA-5.15.0-v1.00 - CSE-v51.8.0)**  **NCTS-P6 (DDNTA-6.2.0-v1.00 - CSE-v60.4.0)** |
| **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-P5 (DDNTA-5.15.0-v1.00 - CSE-v51.8.0): Correction of R0601 and B1922.** |
| The Rule R0601 and BRT B1922 shall be corrected to take into consideration the ‘Export Followed By Transit’ procedure *before* checking the value of the declaration type. It affects 12 messages in the External and Common Domain messages. | |

**Section 2: Problem statement**

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| In **DDNTA-5.15.0-v1**.**00** (based on CSE-v51.8.0), the logic applied in B1922 and R0601 is confusing and should be corrected.  The wording of **R0601** in DDNTA-5.15.0-v1.00:    The wording of **B1922** in DDNTA-5.15.0-v1.00:    Both B1922 and R0601 should be corrected to avoid confusing results. It should take into consideration the EFBT procedure before affecting the value of the message’s declaration type. |

**Section 3: Description of proposed solution**

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| The **DDNTA-5.15.0-v1.00 (incl. Appendix Q2)** and the **CSE-v51.8.0** shall be corrected by updating B1922 and R0601 (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~ ) as follows:  The correction of **Β1922** –as defined below – affects the messages **CC013C, CC015C, CD001C, CD003C, CD038C, CD050C, CD115C, CD160C, CD165C**.  **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 - PREVIOUS DOCUMENT.Type>   is EQUAL to ‘N830’)   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 // no further constraints on ‘Declaration type’ data items**  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}  The correction of **R0601** –as defined below – affects the messages **CC013C, CC015C, CC017C, CC029C, CC043C, CD001C, CD003C, CD038C, CD050C, CD115C, CD160C, CD165C**.  **Technical Description:**  IF /\*/Consignment/HouseConsignment/ConsignmentItem/AdditionalReference/type is in SET CL234 (DocumentTypeExcise)  (i.e. Export of excise goods followed by transit (EMCS&AES+NCTS))  THEN  **IF /\*/Consignment/HouseConsignment/PreviousDocument/type is EQUAL to ‘N830’)**  **THEN**  IF /\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is PRESENT  THEN ~~(~~/\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is EQUAL to ‘T1’  ~~AND /\*/Consignment/HouseConsignment/PreviousDocument/type is EQUAL to ‘N830’)~~  ELSE ~~(~~/\*/TransitOperation/declarationType is in SET {‘T1’, ‘TIR’}  ~~AND /\*/Consignment/HouseConsignment/PreviousDocument/type is EQUAL to ‘N830’)~~;  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/declarationType is PRESENT  THEN /\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is in SET {T2, T2F}  ELSE /\*/TransitOperation/declarationType is in SET {T2, T2F}  **IMPACT ASSESSMENT:**  This RFC-Proposal must be applied before starting NCTS-P5 operations, to avoid rejections of declarations and blocked movements.  **Proposed** date of applicability in Operations (**T-Ops**):   As soon as possible, before starting P5 CD operations.  **Proposed** date of applicability in CT (**T-CT**):                     15.01.2023  (to be confirmed)  **Expected** date of approval by ECCG (**T-CAB**):                  21.12.2022  **Risk in case of non-implementation:**  Some messages will be rejected and some movements blocked. Impact on traders and on National Helpdesks.  **Impacted messages:**  **NCTS-P5:**   * CC013C, CC015C, CC017C, CC029C, CC043C, * CD001C, CD003C, CD038C, CD050C, CD115C, CD160C, CD165C.   **NCTS-P6:**   * CC013D, CC015D, CC017D, CC029D, CC043D, CCA13D, CCA15D, CCA29D. * CD001D, CD003D, CD038D, CD050D, CD115D, CD160D, CD165D, CDA13D, CDA15D.   **Impacted Rules, Conditions & BRTs etc.:**   * Β1922 & R0601   **Impacted CI Artefacts:**   * **CSE-v51.8.0: Yes.** * **DDNTA-5.15.0-v1.00 (Appendix Q2\_R\_C, Q2): Yes.** * Functional Specifications NCTS-P5 (FSS/BPM): 5.30.2: No. * DDCOM-20.4.0-v1.00: No. * DDNTA-5.15.0-v1.00 (Main Document): No. * **DMP Package-v5.7.0-v1.00: Yes.** * CTS-5.7.1-v1.00: No. * ACS Main Document: v5.8.0-v1.00 & ACS Annex for NCTS: 5.8.0-v1.00: No. * CTP-5.10.0-v1.00: No. * **TRP-5.11.1: Yes.** * **CRP-5.7.4-v1.00: Yes.** * ieCA 1.0.4.1: No. * AES-P1 and NCTS-P5 Long-Lived “Legacy” (L3) Movements Study v1.50-v1.00: No. * CS/MIS2\_DATA: No. * CS/RD2\_DATA: No. * UCC IA/DA Annex B: No.   **NCTS-P6:**   * **CSE-v60.4.0: Yes.** * **DDNTA-6.2.0-v1.00 (Appendix Q2\_R\_C, Q2 PDFs): Yes. [only R0601 is corrected, B1922 not used]** * DDNTA-6.2.0-v1.00 (Main Document): No. * DDCOM-21-3.0-v1.00: No. * Functional Specifications NCTS-P6 (FSS/BPM): 7.10.0: No. |

**Impact on CI artefacts**

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| **DDNTA-5.15.0-v1.00**  **and DDNTA-6.2.0-v1.00**  **(Appendices)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **PDF Q2 generated by SpecsManager. Manual update of Appendix Q2\_R\_C for the BRT and the rule, as per section 3 above.** | |
| **CSE- v51.8.0** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Update of Β1922 and R0601 as per section 3 above.** | |
| **CSE- v60.4.0** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Update of R0601 as per section 3 above.** | |
| **DMP Package-5.7.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Β1922 and R0601 should be updated in various file** | |
| **TRP-5.11.1-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Corrections of the Β1922 and R0601 in** RULES.DRL**.**  **The list of impacted TCs:**  **For R0601:** TBS-EFT-002\_1, TBS-EFT-002\_2, TBS-EFT-002\_3, TBS-EFT-003\_1,  TBS-EFT-005\_1, TBS-EFT-005\_2, TBS-EFT-006\_1, TBS-EFT-007\_1,  TFE-R0416\_1, TFE-R0416\_2, TFE-R0601\_1, TFE-R0601\_2 No impact for **B1922.** | |
| **CRP-5.7.4-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Update of the file** RULES.DRL. | |

**Estimated impact on National Project**

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| Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Rewording of one BRT and one rule.  Impact on external domain to be assessed by each NA. | |

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| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFTDEV | 06/12/2022 | *Draft by SOFTDEV* |
| v0.20 | Updates by SOFTDEV | 13/12/2022 | *Implementing Comments provided by DG TAXUD* |
| v1.00 | SfR to NPMs | 16/12/2022 | *For emergency review by NPMs* |
| v1.00a | SfR2 to NPMs | 20/12/2022 | *Implementing comments from NA-DE.*  *Impact on TRP added. Information added about changes in DDNTA of NCTS-P6.* |
| v1.10 | SfA to NPM | 08/01/2023 | ***Considered as accepted following CAB on 21.12.2022.  No change applied compared to v1.00a.*** |