# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0221** (JIRA: UCCNCTS-3481) |
| **Related Incident ID** | **IM580354 / PM25544 / KE23392** |
| **RFC Initiator / Organization** | **NA-DK & DG TAXUD IT** |
| **CI** | **NCTS-P5 (DDNTA-5.15.1-v1.00 - CSE-v51.8.2)**  *See also* ***RFC-List.40*** *for the impact on* ***DDNTA-6.2.0-v1.01*** |
| **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-5.15.1-v1.00 - CSE-v51.8.2): Correcting the wording of C0587 (to avoid ‘CustomsOfficeOfExitForTransit Declared’** **when the declaration includes no EXS data). During TP the B1966 will be introduced to sustain the current wording of C0587.** |
| The condition C0587 is corrected to clearly specify that the Data Group <CUSTOMS OFFICE OF EXIT FOR TRANSIT (DECLARED)> is **optional** when the security is equal to ‘2’ (EXS) or ‘3’ (ENS & EXS) **and** at least one of the <CUSTOMS OFFICE OF TRANSIT (DECLARED)> is located in a CTC country that does not belong to the customs security agreement area (CL147). **In any other case**, the condition **shall not allow** the usage of the Data Group <CUSTOMS OFFICE OF EXIT FOR TRANSIT (DECLARED)>. The ambiguity for security ‘1’ (ENS only) or ‘0’ (no security) is eliminated. |

**Section 2: Problem statement**

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| In **NCTS-P5 DDNTA-5.15.1-v1.00** based on **CSE-v51.8.2**, the condition C0587 attached to D.G. ‘CustomsOfficeOfExitForTransitDeclared’ does not specify the optionality in the cases where security is in SET {0,1} (i.e., no Safety & Security data or combined only with ENS data).    A new BRT1 will sustain the current wording of C0587 only during TP. The impact of the existing inaccuracy is minimal: the movements shall never be blocked. Some extra information can be included in case of security ‘0’ or ‘1’. The sending of some extra messages (CD160C and CD024C) [i.e., not needed] shall not block any movement.  After TP the amended C0587 will be enforced**.** It is important that C0587 is **uniformly** applied by all NAs, and any change applied in a **synchronous** way. |

**Section 3: Description of proposed solution**

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| The **DDNTA-5.15.1-v1.00** and the **CSE-v51.8.0** shall be modifiedas follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~):  **In Appendix Q2, addition of B1966:**  **CC015C and CC013C:**  ---CUSTOMS OFFICE OF TRANSIT (DECLARED) 9x D C0030, G0030  ---CUSTOMS OFFICE OF EXIT FOR TRANSIT (DECLARED) 9x D **B1966**, C0587, G0587  Sequence number R n..5 R0987  Reference number R an8 CL175 R0103  ---HOLDER OF THE TRANSIT PROCEDURE 1x R  **CC017C:**  ---CUSTOMS OFFICE OF TRANSIT (DECLARED) 9x D C0030, G0030, G0042  ---CUSTOMS OFFICE OF EXIT FOR TRANSIT (DECLARED) 9x D **B1966**, C0587, G0042  Sequence number R n..5 R0987  Reference number R an8 CL175 R0871  ---HOLDER OF THE TRANSIT PROCEDURE 1x R  **CC029C:**  ---CUSTOMS OFFICE OF TRANSIT (DECLARED) 9x D C0030, G0030  ---CUSTOMS OFFICE OF EXIT FOR TRANSIT (DECLARED) 9x D **B1966**, C0587  Sequence number R n..5 R0987  Reference number R an8 CL175 R0103, R0871  ---HOLDER OF THE TRANSIT PROCEDURE 1x R  **CD001C:**  ---CUSTOMS OFFICE OF TRANSIT (DECLARED) 9x D B1836, C0030, G0030  ---CUSTOMS OFFICE OF EXIT FOR TRANSIT (DECLARED) 9x D **B1966**, C0587, C0812  Sequence number R n..5 R0987  Reference number R an8 CL175 R0103  ---HOLDER OF THE TRANSIT PROCEDURE 1x R  **CD003C, CD038C:**  ---CUSTOMS OFFICE OF TRANSIT (DECLARED) 9x D B1836, C0030, C0466,  G0030, S1022  ---CUSTOMS OFFICE OF EXIT FOR TRANSIT (DECLARED) 9x D **B1966**, C0466, C0587,  C0812, S1002  Sequence number R n..5 R0987  Reference number R an8 CL141 R0103  ---HOLDER OF THE TRANSIT PROCEDURE 1x R  **CD050C:**  ---CUSTOMS OFFICE OF TRANSIT (DECLARED) 9x R G0030  ---CUSTOMS OFFICE OF EXIT FOR TRANSIT (DECLARED) 9x D **B1966**, C0587, C0812  Sequence number R n..5 R0987  Reference number R an8 CL175 R0103  ---HOLDER OF THE TRANSIT PROCEDURE 1x R  **CD115C:**  ---CUSTOMS OFFICE OF TRANSIT (ACTUAL) 1x R  ---CUSTOMS OFFICE OF EXIT FOR TRANSIT (DECLARED) 9x D **B1966**, C0466, C0587,  C0812, S1002  Sequence number R n..5 R0987  Reference number R an8 CL141 R0103  ---HOLDER OF THE TRANSIT PROCEDURE 1x R  **CD165C:**  ---CUSTOMS OFFICE OF TRANSIT (DECLARED) 9x D C0366, G0030  ---CUSTOMS OFFICE OF EXIT FOR TRANSIT (DECLARED) 9x D **B1966**, C0466, C0587,  C0812, S1008  Sequence number R n..5 R0987  Reference number R an8 CL141 R0103  ---HOLDER OF THE TRANSIT PROCEDURE 1x R  With:   * **B1966**   **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to<TPendDate>  THEN C0587 will be disabled  IF /\*/TransitOperation/security is in SET {2,3}  THEN  IF the first two characters of at least one iteration of the  /\*/CustomsOfficeOfTransitDeclared/referenceNumber is NOT in SET CL147  THEN /\*/CustomsOfficeOfExitForTransitDeclared = "O"  ELSE /\*/CustomsOfficeOfExitForTransitDeclared = "N"  **Functional Description:**  N/A   * **And the updated wording of C0587:**   **Technical Description:**  IF /\*/TransitOperation/security is in SET {2,3} AND  the first two characters of at least one iteration of the /\*/CustomsOfficeOfTransitDeclared/referenceNumber is NOT in CL147 (CountryCustomsSecurityAgreementArea)  ~~IF /\*/TransitOperation/security is in SET {2,3}~~  ~~THEN~~  ~~IF the first two characters of at least one iteration of the~~  ~~/\*/CustomsOfficeOfTransitDeclared/referenceNumber is NOT in SET CL147~~  THEN /\*/CustomsOfficeOfExitForTransitDeclared = "O"  ELSE /\*/CustomsOfficeOfExitForTransitDeclared = "N"  **Functional** Description:  IF <TRANSIT OPERATION.Declaration type> is in SET {2,3} AND  the first two characters of at least one iteration of the <CUSTOMS OFFICE OF TRANSIT  DECLARED.Reference number> is NOT in CL147  ~~IF <TRANSIT OPERATION.Declaration type>is in SET {2,3}~~  ~~THEN~~  ~~IF the first two characters of at least one iteration of the <CUSTOMS OFFICE OF TRANSIT~~  ~~DECLARED.Reference number> is NOT in CL147~~  THEN <CUSTOMS OFFICE OF EXIT FOR TRANSIT DECLARED> = "O"  ELSE <CUSTOMS OFFICE OF EXIT FOR TRANSIT DECLARED> = "N"  and **DDNTA\_APP\_Q2 R\_C-5.15.1-v1.00-SfA.xlsx** and the new **Appendix D** will be adapted accordingly.  Also, the wording of the sequences S1002 and S1008 will be updated as follows:  **S1002**  **Technical Description:**  The validation of particular Data Group/Item shall be performed in the following sequence: C0466 > C0812 > B1966 > C0587  **S1008**  **Technical Description:**  The validation of particular Data Group/Item shall be performed in the following sequence: C0466 > B1966 > C0587  In **Appendix K**, the C0587-related rows will be modified as follows:    and the following B1966-related rows will be added:    It should be noted that the above configuration of values “Validated By Sender” and “Validated By Recipient” contradicts the guidance for BRT-1 in DDCOM. Though, this deviation for B1966 in the Common Domain was decided to avoid unnecessary rejections of messages during the TP.  No impact on the Appendix C of **DDNTA-5.15.1-v1.00**.  No impact on the Appendix X of **DDNTA-5.15.1-v1.00**.  Note:  The **DDNTA-6.2.0-v1.01** and the **CSE-v60.4.1 shall be corrected also for the C0587.** A dedicated RFC for NCTS-P6 is included in the **RFC-List.40**, to define the improvement of C0587.  **IMPACT ASSESSMENT:**  This RFC-Proposal will improve quality **after TPendDate**. It is not resolving a blocking issue. Taking advantage of the ‘TPendDate’ mechanism, it can be deployed by each NA in a flexible way, but it must be deployed BEFORE the ‘TPendDate’ defined in CL990 of CS/RD2 or at the latest on ‘TPendDate’. It will ensure smooth operational continuity.  **Proposed** date of applicability in Operations (**T-Ops**):   Any date before or on **TPendDate**, as defined in CS/RD2-CL990  **Proposed** date of applicability in CT (**T-CT**):                     2024Q2 (precise date to be confirmed)  **Expected** date of approval by ECCG (**T-CAB**):                  Together with DDNTA-5.15.2.  **Risk in case of non-implementation:**  If ***not*** implemented (or implemented ***after*** TPendDate) by one NA, a number of Common Domain messages will be rejected and those movements would be blocked.  If this RFC is ***not adopted*** for NCTS-P5 and applied on TPendDate, the correction will become necessary *after* the start of NCTS-P6, with a need for a new big-bang date under NCTS-P6, or it would require the creation of a ‘*RFC-ListXXEndDate*’ to ensure a smooth transition (which can be avoided by simply adopting this RFC).  **Impacted messages:**   * **External Domain:** CC013C, CC015C, CC017C, CC029C. * **Common Domain:** CD001C, CD003C, CD038C, CD050C, CD115C, CD165C.   **Impacted Rules/Conditions, Guidelines:**   * C0587 * B1966 * S1002 * S1008   **Impacted CI Artefacts:**   * **CSE-v51.8.2: Yes.** * **DDNTA-5.15.1-v1.00 (Appendix ‘Q2\_R\_C’ and ‘Q2’ (PDF), ‘K’ and ‘D’): Yes.** * Functional Specifications NCTS-P5 (FSS/BPM): 5.30.2: No. * DDCOM-20.4.0-v1.00: No. * DDNTA-5.15.1-v1.00 (Main Document): No. * **DMP Package-v5.8.0-v1.00: Yes.** * CTS-5.7.6-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:** **Yes**. * **TRP-5.13.2-v1.00: Yes** * **CRP-5.8.0: 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:   [🡪 See RFC-List.40 for more details]**   * **CSE-v60.4.1: Yes.** * **DDNTA-6.2.0-v1.01: Yes.**   **ieCA/TED related:**   * No impact on CRP (tbc). |

**Impact on CI artefacts**

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| **DDNTA-5.15.1-v1.00 (NCTS P5)**  **& CSE-v51.8.2 (NCTS P5)** | Cosmetic  Low  Medium  High  Very High   |  | | --- | | **Appendix ‘Q2’ and ‘K’ generated by Specs Manager and Manual update of Appendix ‘Q2\_R\_C’ for the C0587 & B1966, as described in section 3.** | |
| **DDNTA-6.2.0-v1.01 (NCTS P6) (Appendices)**  **& CSE-v60.4.1 (NCTS P6)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **See RFC-List.40 for the details.** | |
| **DMP Package-v5.8.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Manual update of file ‘Rules and Conditions\_v0.47’ for the C0587 as described in section 3. [it will be moved as Appendix D of DDNTA]** | |
| **TRP-5.13.4-v1.00** | Cosmetic  Low  Medium  High  Very High  Draft impact on CTP/TRP identified at this stage:  The testing of B1966 shall be relevant only for ‘**During TP**’. The testing of C0587 shall be added for ‘**Post TP**’. To be noted:   * the NTAs aligned to DDNTA-5.15.1 can keep testing with CTA with the current C0587 * the NTA aligned to DDNTA-5.15.2 can keep testing with CTA with the future C0587   Rules.drlshall be modified, with B1966 added (NCTS-P5). |

**Estimated impact on National Project**

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| Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Assessed as medium considering the impact on **both** **External** Domain and **Common** Domain. (Addition of one BRT1, Update of C0587). | |

| **Document History** | | | |
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| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFTDEV | 03/04/2023 | *Draft by SOFTDEV* |
| v0.20 | SfR to DG TAXUD | 08/05/2023 | *SfR Submission. Updating all sections by removing the EFBT issue and its resolution respectively.* |
| v1.00 | SfA to DG TAXUD | 22/06/2023 | *SfA Submission. Updating all sections by implementing DG TAXUD comments.* |
| v1.01 | SfA updated | 12/07/2023 | *Updated to get this RFC applicable on 01.12.2024 (New ‘TPendDate’ expected, as defined in RFC-List.38) and becoming part of RFC-List.39.* |
| v1.02 | SfA updated | 12/09/2023 | *Updated while reviewing the DDNTA-5.15.2 – This RFC shall be part of the folder ‘Supporting Documents’ - RFC applicable from ‘TPendDate’ as defined in RFC-List.38 (no more reference to 01.12.2024). Extended with the definition of changes in the various messages.* |
| v1.03 | SfA updated | 19/09/2023 | *Updated while reviewing the DDNTA-5.15.2 – This RFC shall be part of the folder ‘Supporting Documents’ - RFC applicable from ‘TPendDate’ as defined in RFC-List.38 (no more reference to 01.12.2024). Extended with the definition of changes in the various messages. Comments from CCO implemented.* |
| v1.04 | SfR-NPM version | 02/10/2023 | *Implementing some extra corrections, expected also to be applied in DDNTA-5.15.2-v1.10.* |
| v1.05 | SfR to DG TAXUD after external review | 06/11/2023 | *NA comments implemented by SOFTDEV.* |
| v1.06 | Commented by DG TAXUD | 08/11/2023 | *Minor comments provided* |
| V1.07 | SfA updated | 09/11/2023 | *Implementing minor comments for DDNTA-5.15.2-v1.10.* |