# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

|  |  |
| --- | --- |
| **RFC ID** | **RFC\_NCTS\_0222 (JIRA: UCCNCTS-3765)** |
| **Related Incident ID** | **IM603420** |
| **RFC Initiator / Organization** | **NA-SI & NA-DE / DG TAXUD** |
| **CI** | **NCTS-P5 (DDNTA-5.15.1-v1.00 – CSE-v51.8.2)**  **implemented in DDNTA-5.15.2-v1.00(SfR-NPM) – CSE-v51.8.4** |
| **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***

|  |
| --- |
| **NCTS-P5 (DDNTA-5.15.1-v1.00 - CSE-v51.8.2): Correction of C0001 to take into account the addition of “Country of destination” under HC level, as defined in the CTC Convention.** |
| The condition C0001 is updated to take into consideration that the ‘Country of destination’ can be included at House Consignment level  This RFC must be read together with RFC\_NCTS\_0220 that defines the correction for the “Country of destination” (to be aligned to the CTC Convention Annex A1a). |

**Section 2: Problem statement**

|  |
| --- |
| The NCTS-P5 **DDNTA-v5.15.1-v1.00** (based on CSE-v51.8.2) already defines the condition C0001 to control the optionality of the Data Group ‘*CONSIGNEE’.*  The C0001 is disabled during the Transitional Period (TP) (via B1030 or B1823), it is applicable only **after** **the Transitional Period***. 🡪 Thus, no risk of operational issue with C0001 during TP.*  After **the Transitional Period**, the Data Group *CONSIGNEE* is present:   * Either at CONSIGNMENT level (as defined by **C0001**), * or at HOUSE CONSIGNMENT (HC) level (as defined by **C0001** and **R0506**), * but NOT at House Consignment Item (HCI) level (as defined by **B2400**)   The *Country of destination* must **always** be defined (as defined by the corrected C0343 and R0507):   * either at CONSIGNMENT level, * or at HCI level, * or at HC level. 🡺 *This is corrected to become aligned to the legal basis as defined in CTC Convention Annex A1a – as defined in RFC\_NCTS\_0220 (RFC-List.39).*   It **cannot** be present at the same time at various levels.  The Condition **C0001** defines the following logic:   1. If the Country of destination is in one of the CTC Contracting Parties, then the CONSIGNEE is **required**:  * either at Consignment level, * or at House Consignment level.   It **cannot** be present at the same time at both levels.   1. If the Country of destination is **NOT** one of the CTC Contracting Parties, then the CONSIGNEE is **NOT** required ***for TRANSIT declarations NOT COMBINED with EXS.*** In this case,the CONSIGNEE**can** be present:  * either at Consignment level, * or at House Consignment level.   Still, it **cannot** be present at the same time at both levels.   1. If the Country of destination is **NOT** one of the CTC Contracting Parties but the ***TRANSIT declaration IS COMBINED with EXS,*** the CONSIGNEE**must** be present:  * either at Consignment level, * or at House Consignment level.   Still, it cannot be present at the same time at both levels.  … except in the following special case:   1. where we have at the same time the following: 2. the ***TRANSIT declaration IS COMBINED with EXS,*** and 3. the **code ‘30600’** is included in the “Additional Information”, it means that negotiable bills of lading to order blank endorsed are concerned and the **consignee particulars are unknown**.   the CONSIGNEE**SHALL NOT** be present   * neither at Consignment level, nor at any House Consignment level (if the code ‘30600’ is present at Consignment level), * neither at Consignment level, nor at House Consignment level having the code ‘30600’.   ***C0001***  *IF /\*/****Consignment/countryOfDestination*** *is in SET CL009*  *THEN IF /\*/Consignment/Consignee is PRESENT*  *THEN /\*/Consignment/HouseConsignment/Consignee = "N"*  *ELSE /\*/Consignment/HouseConsignment/Consignee = "R"*  *ELSE IF /\*/TransitOperation/security is in SET {0,1}*  *THEN IF /\*/Consignment/Consignee is PRESENT*  *THEN /\*/Consignment/HouseConsignment/Consignee = "N"*  *ELSE /\*/Consignment/HouseConsignment/Consignee = "O"*  *ELSE IF at least one instance of /\*/Consignment/AdditionalInformation/code is EQUAL*  *to '30600'*  *THEN /\*/Consignment/Consignee = "N" AND*  */\*/Consignment/HouseConsignment/Consignee = "N"*  *ELSE IF at least one instance of /\*/Consignment/HouseConsignment*  */AdditionalInformation/code IS EQUAL to '30600'*  *THEN /\*/Consignment/Consignee = "N" AND*  *THIS /\*/Consignment/HouseConsignment/Consignee = "N"*  *ELSE IF /\*/Consignment/Consignee is PRESENT*  *THEN /\*/Consignment/HouseConsignment/Consignee = "N"*  *ELSE /\*/Consignment/HouseConsignment/Consignee = "R"*  The **C0001** evaluates the value of the ***Country of destination* AT CONSIGNMENT LEVEL ONLY**. However, the ***Country of destination*** can be declared by the Holder of Transit Procedure either **AT** **CONSIGNMENT LEVEL ONLY** or **AT HOUSE CONSIGNMENT LEVEL** and/or **AT HCI LEVEL ONLY.**  It means that if the *Country of destination* is NOT DEFINED at CONSIGNMENT level but at HCI level (considering C0343 applied on *Country of destination* at HCI level), then the **CONSIGNEE** is implicitly **optional***. Even if all the Country of destination at HCI level are a Contracting Party to the Convention.*  *This issue should be fixed* ***before*** *the end of the Transitional Period.*  The correction of the condition C0001 should also take into account the change defined in RFC\_NCTS\_0220\_IAR-UCCNCTS-3912, to better define the optionality of D.G. ‘Consignee’.  Indeed, as required by the CTC Annex, the transit declaration must include the ‘Country of Destination’:   * for the whole Consignment (at Consignment level), or * for a specific House Consignment (at HC level), or * for a specific House Consignment Item (at HCI level).   So, the Data Item ‘Country of Destination’ is added under HC level (as per **RFC\_NCTS\_0220\_IAR-UCCNCTS-3912** [RFC-List.39]).  The following example illustrates the case of an NCTS movement from Spain (ES) to Turkey [TR] for goods dispatched from ES or from Morocco (MA) to TR or Armenia (AM) [= the final destination]:  **Extract from CC015C:**  ---**CONSIGNMENT**  (…)  ------**CONSIGNEE** 🡪 “*NOT PRESENT*”  (…)  ------**HOUSE CONSIGNMENT**  Sequence number = 1  Country of dispatch = ES  Country of destination = AM  (…)  ---------**CONSIGNEE** 🡪 “*O*” or “*N*”  (…)  ------**HOUSE CONSIGNMENT**  Sequence number = 2  Country of dispatch = MA  Country of destination = TR  (…)  ---------**CONSIGNEE** 🡪 “*R*”  Since D.G. 'Consignee’ at Consignment level is NOT Present AND the Country of Destination is NOT in CL009 (“CountryCodesCommonTransit”), then the Optionality of D.G. ‘Consignee’ of the first iteration of HC, is **Optional** or **Not used**, depending on a variety of other factors such as “Security” etc., as the /\*/Consignment/HouseConsignment/countryOfDestination is equal to “**AM**” that is NOT in CL009.  On the other hand, the Optionality of D.G. ‘Consignee’ of the second iteration of HC is **Required**, because the /\*/Consignment/HouseConsignment/countryOfDestination is equal to “**TR**” that is in CL009. |

**Section 3: Description of proposed solution**

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| In **DDNTA-5.15.1-v1.0.0 (incl. Appendix Q2)** and the **CSE-v51.8.2**, condition C0001 shall be corrected. This correction will be applicable **from ‘TPendDate’** as defined in CS/RD2-PROD CL990, as illustrated below (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~):  **C0001**  **Technical Description**  IF /\*/Consignment/countryOfDestination is in SET CL009  THEN IF /\*/Consignment/Consignee is PRESENT  THEN /\*/Consignment/HouseConsignment/Consignee = "N"  ELSE /\*/Consignment/HouseConsignment/Consignee = "R"  ELSE IF at least one iteration of /\*/Consignment/HouseConsignment/countryOfDestination is in SET CL009  THEN IF /\*/Consignment/Consignee is PRESENT  THEN /\*/Consignment/HouseConsignment/Consignee = "N"  ELSE /\*/Consignment/HouseConsignment/Consignee = "R" for THIS House Consignment  ELSE IF at least one iteration of  /\*/Consignment/HouseConsignment/ConsignmentItem/countryOfDestination is in SET CL009  THEN IF /\*/Consignment/Consignee is PRESENT  THEN /\*/Consignment/HouseConsignment/Consignee = "N"  ELSE /\*/Consignment/HouseConsignment/Consignee = "R" for THIS House Consignment  that includes THIS Consignment Item  ELSE IF /\*/TransitOperation/security is in SET {0,1}  THEN IF /\*/Consignment/Consignee is PRESENT  THEN /\*/Consignment/HouseConsignment/Consignee = "N"  ELSE /\*/Consignment/HouseConsignment/Consignee = "O"  ELSE IF at least one instance of /\*/Consignment/AdditionalInformation/code is EQUAL to ‘30600’  THEN /\*/Consignment/Consignee = "N" AND /\*/Consignment/HouseConsignment/Consignee = "N"  ELSE IF at least one instance of /\*/Consignment/HouseConsignment/AdditionalInformation/code IS EQUAL to '30600'  THEN /\*/Consignment/Consignee = "N" AND THIS /\*/Consignment/HouseConsignment/Consignee = "N"  ELSE  IF /\*/Consignment/Consignee is PRESENT  THEN /\*/Consignment/HouseConsignment/Consignee = "N"  ELSE /\*/Consignment/HouseConsignment/Consignee = "~~R~~O"  **Functional Description:**  IF <CONSIGNMENT.Country of destination> is in SET CL009  THEN IF <CONSIGNMENT-CONSIGNEE> is PRESENT  THEN <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNEE> = "N"  ELSE <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNEE> ="R"  ELSE IF at least one iteration of <CONSIGNMENT-HOUSE CONSIGNMENT.Country of destination> is in SET CL009  THEN IF <CONSIGNMENT-CONSIGNEE> is PRESENT  THEN <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNEE>= "N"  ELSE <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNEE>= "R" for THIS House Consignment  ELSE IF at least one iteration of  <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM.Country of destination is in SET CL009  THEN IF <CONSIGNMENT-CONSIGNEE> is PRESENT  THEN <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNEE>= "N"  ELSE <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNEE>= "R" for THIS House Consignment that includes THIS Consignment Item  ELSE IF <TRANSIT OPERATION.Security> is in SET {0,1}  THEN IF <CONSIGNMENT-CONSIGNEE> is PRESENT  THEN <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNEE> = "N"  ELSE <CONSIGNMENT-HOUSE CONSIGNMENT -CONSIGNEE>= "O"  ELSE IF at least one instance of <CONSIGNMENT-ADDITIONAL INFORMATION.Code> is EQUAL to '30600'  THEN <CONSIGNMENT-CONSIGNEE> = "N"  AND <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNEE> = "N"  ELSE IF at least one instance of <CONSIGNMENT-HOUSE CONSIGNMENT- ADDITIONAL INFORMATION.Code> is EQUAL to '30600'  THEN <CONSIGNMENT-CONSIGNEE> = "N" AND <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNEE> = "N"  ELSE  IF <CONSIGNMENT-CONSIGNEE> is PRESENT  THEN <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNEE> = "N"  ELSE <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNEE>= "~~R~~O"  Moreover, the value of the “Validated by Recipient” in the **DDNTA 5.15.1-v1.00 Appendix K** will be updated as follows for the CD003C, CD038C, CD115C and CD165C messages:   |  |  |  | | --- | --- | --- | | **TMS Path** | **Validated by Sender** | **Validated by Recipient** | | MESSAGE / CONSIGNMENT / CONSIGNEE | R | ~~SR~~ **N** | | MESSAGE / CONSIGNMENT / HOUSE CONSIGNMENT / CONSIGNEE | R | ~~SR~~ **N** |   **IMPACT ASSESSMENT:**  This RFC-Proposal updates the condition C0001 included in several messages exchanged over the External and Common Domain, but this condition is applicable only AFTER the end of the Transitional Period. It is necessary to enforce compatibility between all National Transit Application, taking advantage of the BRT that are suspending C0001 during TP. It must be deployed (at any time) ***before or on* TPendDate** (defined in CS/RD2-PROD CL990, expected to be defined based on the next version of UCC WP as ‘21.01.2025’).  **Proposed** date of applicability in Operations (T-Ops): **TPendDate** as defined in CS/RD2-PROD CL990  **Proposed** date of applicability in CT (T-CT): 2024Q2 (precise date to be confirmed)  **Expected** date of approval by NPMs (T-CAB): Together with DDNTA-5.15.2.  **Risk in case of non-implementation**:   * Movements will be blocked and manual BCP would be required (Common Domain messages will be rejected, because C0001 would be considered as broken).   **Impacted Messages:**   * **External Domain:** CC013C, CC015C, CC017C, CC029C, CC043C. * **Common Domain:** CD001C, CD003C, CD038C, CD050C, CD0115C, CD0160C, CD0165C.   **è This change MUST be applied by all NAs and all traders at the latest on TPendDate.**  **Impacted Rules, Conditions & BRTs etc.:**   * C0001     **Impacted CI Artefacts:**   * **CSE-v51.8.2: Yes.** * **DDNTA-5.15.1-v1.00 (only Appendices D, K, Q2, Q2\_R\_C): 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 (excluding file ‘Rules and Conditions\_v0.47.xlsx’): Yes.** * CTS-5.8.4-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-5.13.6-v1.01: Yes.** * **CRP-5.8.3 (DROOLS): 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: Yes** (a dedicated RFC is created to ensure consistency and operational continuity). |

**Impact on CI artefacts**

|  |  |  |
| --- | --- | --- |
| **CSE-v51.8.2** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **The wording of C0001, shall be updated as described in section 3.** | |
| **DDNTA-5.15.1-v1.00 (Appendices)** | Cosmetic Low  Medium  High  Very High  Short description   |  | | --- | | **See section 3. PDF of Appendix ‘Q2’ generated by SpecsManager. Manual update of Appendices ‘D’, ‘K’ and ‘Q2\_R\_C’ for wording of C0001.** | |
| **DMP Package-v5.8.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **See section 3, new guideline is added.** | |
| **CTP-5.10.0-v1.00 & TRP-5.13.2-v1.01 (and related version of CTP-Explorer) (CONF only)** | Cosmetic  Low  Medium  High  Very High  Draft impact on CTP/TRP identified at this stage:   |  |  |  | | --- | --- | --- | | **Update TC:** | **n/a** | **n/a** | | **New Test Cases:** | **Yes** | **A new test case (TFE-C0001\_7) will be introduced** | | **Updated Drools:** | **Yes** | **Correction in file** Rules.drl **for C0001.** | | **Other:** | **n/a** | **n/a** | |
| **CRP-5.8.1 (CONF & PROD)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Update to take into account the change in **Rules.drl**. | |

**Estimated impact on National Project**

|  |  |
| --- | --- |
| Cosmetic Low  Medium  High  Very High  Short description   |  | | --- | | To be assessed precisely by each NA for the External Domain. | |

|  |  |  |  |
| --- | --- | --- | --- |
| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.01 | Draft by SOFTDEV | 21/08/2023 | *Draft by SOFTDEV* |
| v1.00 | SfA to DG TAXUD | 14/08/2023 | *SfA Submission. Updating all section by implementing DG TAXUD comments.* |
| v1.01 | Commented by DG TAXUD | 22/09/2023 | *Comment with track changes – Version 1.02 expected* |
| v1.02 | SfA to DG TAXUD | 25/09/2023 | *SfA Submission. Updating all section by implementing DG TAXUD comments.* |
| v1.03 | Updated by DG TAXUD | 26/09/2023 | *Comment with track changes – Version 1.04 expected* |
| v1.04 | SfA to DG TAXUD | 26/09/2023 | *SfA Submission. Implementing comments received by DG TAXUD.* |
| v1.05 | SfR-NPM version | 02/10/2023 | *Implementing some extra corrections, expected also to be applied in DDNTA-5.15.2-v1.10.* |