# Impact Analysis Report/ RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0223** (JIRA: UCCNCTS-3442) |
| **Related Incident ID** | **IM579683 / KE23272/ PM25393** |
| **RFC Initiator / Organization** | **DG TAXUD IT / EEA** |
| **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   |  | | --- | | **Correcting the multiplicity of an important Data Group (House consignment) in the transit declaration** | |
| **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) and NCTS-P6 (DDNTA-6.2.0-v1.01 – CSE-60.4.1): Changing the cardinality of D.G. ‘House Consignment’ from ‘99x’ to ‘1999x’ in the transit declaration (and all CC015C-related messages).** |
| The **NCTS-P4** transit declarations offer the possibility to group **999x** different **Goods Items** for 999x CONSIGNEES with 999x TRANSPORT DOCUMENTS. This cardinality **remains possible in DDNTA-5.15.1 during the Transitional Period** from Phase 4 to Phase 5 (CONSIGNEES can be defined at HOUSE CONSIGNMENT ITEM level). But **after the end of the Transitional Period**, the **CONSIGNEE information shall be kept only at the HOUSE CONSIGNMENT level**. Similar for the **TRANSPORT DOCUMENT** and **TRANSPORT CHARGES** (both related to the HOUSE CONSIGNMENT), as defined in DDNTA-5.15.1 and DDNTA-6.2.0.  The **cardinality of the HOUSE CONSIGNMENT shall be increased** to offer the possibility to have more than 99x HOUSE CONSIGNMENT (proposed **1999x**) while **keeping the existing limit on the maximum number of Consignment Items for the whole transit declaration (1999x)**.  This change - suggested by the **European Express Courier Association** and also **supported** by various National teams - should be **applicable at the end of the Transitional Period**, when all NTA are operating fully and exclusively as NCTS-P5. The change will be of particular interest for the traders lodging **declarations with very small number of HOUSE CONGIGNMENT ITEMS per HOUSE CONSIGNMENT**: at maximum it will be possible to have *one declaration* with *1999x HC* and *1999x HCI* in total (possibly linked to 1999x Export declarations, in case of Export Followed By Transit).  Finally, this RFC-Proposal takes the opportunity to describe in a more explicit way how the **Previous document** type ‘N830’ (Export declaration) shall be used in case of **Export Followed By Transit** *DURING* the Transitional Period and *AFTER* the Transitional Period.  This change is also applicable to the DDNTA of NCTS-Phase 6. |

**Section 2: Problem Statement**

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| 1/  In **DDNTA-5.15.1-v1.0.0** (based on CSE-v51.8.2), the cardinality of the Data Group ***/\*/Consignment/House Consignment*** in the transit declaration (CC015C) and all related messages is **99x** with a **restriction (E1406 🡪 1x only)** applicable **during the Transitional Period**, to enable the DOWNGRADING of the NCTS-P5 messages to the NCTS-P4 format.  As illustrated below with an extract of the CC015C from DDNTA Appendix Q2:    Each HOUSE CONSIGNMENT can include up to 999x ***/\*/Consignment/House Consignment/Consignment Item,*** with the important limitation that the total number of Goods Items in the Transit declaration is restricted to **1999x**, as document by the Guideline G0005 that says:  ***Functional description:***  *The maximum value is 1999 as defined in the XSD pattern.*  Extract from CC015C:  (…)  **CONSIGNMENT ITEM** **999x** R G0071  Goods item number R n..5 G0072, R0988  **Declaration goods item number** R n..5 **G0005**, R0007  Declaration type D an..5 CL232 B1922, C0045, R0507, R0601, R0909  (…)    Taking into consideration the above cardinalities, the Traders will be able to lodge declarations:   * **During the Transitional Period:** * One declaration with, in total: * 999x HCI and * 999x CONSIGNEES and * 999x TRANSPORT DOCUMENTS (And even more: the (theoretical) limit is 99x\*999x = 98901x) * **After the end of the Transitional Period:** * One declaration with, in total: * 99x HC and * 99x HCI and * 99x CONSIGNEES and * Up to 9999x TRANSPORT DOCUMENTS   if each HC includes only one HCI (which seems to be frequent in the context of eCommerce & Express Courier business), OR   * One declaration with, in total: * 99x HC and * 1999x HCI and * 99x CONSIGNEES and * 9999x TRANSPORT DOCUMENTS   if some or most HC includes multiple HCI (which seems **not** adapted to the needs of eCommerce & Express Courier business),  This means that at the end of the Transitional Period, the number of transit declaration to be lodged by Express Courier and eCommerce related traders will automatically be multiplied by x10 (worse case), and they will not be able to take a real advantage of the increase of the total number of Goods Items from 999x (P4) to 1999x (P5).  We remind the reader that the *maximum* number of goods items that may be included in a transit declaration is doubled in NCTS-P5 compared to NCTS-P4. The limitation to 1999x is applied to take into account the technical constraints of the maximum size of messages as defined in the **DDCOM-Main Document-21.2.0-v1.00 [Section VIII.2.26 - Maximum Message Size]:**  “For the purpose of NCTS-P5 and AES-P1, as well as for NCTS-P6:   * the highly recommended maximum size of the CCN message is set to be at 20 Mbytes without any compression applied, and * the strictly allowed maximum size of the CCN message shall not be more than 22 Mbytes without any compression applied, and * if a message is sent by mistake on the Common Domain, with a size larger than 22 Mbytes, then the receiving country shall reject this oversized message by means of CD917C/CD917D with the following content:   errorLineNumber=0,  errorColumnNumber=0,  no errorPointer,  errorCode=52,  errorText=”maximum input size exceeded”,  originalAttributeValue=<actual size>.  Consequently, the National Applications must define and apply limits on the declaration messages, to avoid that a declaration message is accepted from the declarant but cannot be exchanged on the Common Domain. Each National Transit Application must be able to receive and process the Common Domain messages with the cardinality defined in the Appendix Q2 (when the size of the message is below the limit of 22 MBytes per uncompressed message). The same approach is applicable to AES-P1.”  2/  In addition, there is a need for clarification about how the **Previous document** type ‘N830’ shall be used in case of **Export Followed By Transit** *AFTER* the Transitional Period (different from the usage *DURING* the Transitional Period).  Indeed, during the Transitional Period:   * only one HC can be used, * the Data Group HC/PREVIOUS DOCUMENT is not used and, * the EXPORT MRN must be inserted in the Data Group HC/HCI/PREVIOUS DOCUMENT/Type, with Codelist CL214 (“PreviousDocumentType”) applied.   But after the Transitional Period:   * up to 99x HC can be used, * the Data Group HC/HCI/PREVIOUS DOCUMENT/type is not used and, * the EXPORT MRN must be inserted in the Data Group HC/PREVIOUS DOCUMENT/Type, with Codelist CL228 (“PreviousDocumentExportType”) applied.   It should be explicitly documented that from the end date of the Transitional Period, the value ‘N830’ shall be valid ONLY in CL228 and it shall be invalidated in the CL214 (changes to be applied in CS/RD2 CONF and CS/RD2 PROD), to avoid any confusion.   |  |  |  | | --- | --- | --- | |  | **During TP** | **After TP** | | **MC** | 1x | 1x | | **MC/PREVIOUS DOCUMENT** | 0x | 9999x  is used to store any code from CL214, (= current content of CL214, less the 'N830' (EXPORT MRN)) | | **MC/HC** | 1x | 99x (1999x after this RfC) | | **MC/HC/PREVIOUS DOCUMENT** | 0x | 99x for consistency reason, practically 1x  is used to store the code 'N830' (EXPORT MRN) from CL228 | | **MC/HC/HCI** | 999x (total max 999) | 999x (total max 1999) | | **MC/HC/HCI/PREVIOUS DOCUMENT** | 9x  is used to store any code from CL214 (= current content of CL214, including the 'N830' (EXPORT MRN)) | 99x  is used to store any code from CL214 (= current content of CL214, less the 'N830' (EXPORT MRN)) | | **EXPORT MRN** | In MC/HC/HCI/PREVIOUS DOCUMENT/Type | In MC/HC/PREVIOUS DOCUMENT/Type |   Finally, it should be noted that the value ‘N830’ which signifies the “Export Followed by Transit” procedure, after the end of the Transitional Period will ONLY be present in code list CL228, instead of CL114 as is in the current state of affairs. |

**Section 3: Description of proposed solution**

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| 1a/  The **DDNTA-5.15.1-v1.00 (incl. Appendix Q2), DMP 5.8.0-v1.00** and the **CSE-v51.8.2** shall be corrected as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~ ):  The cardinality of ‘HOUSE CONSIGNMENT’ should be updated from 99x to 1999x in the following NCTS-P5 messages:   * Common Domain: CD001C, CD003C, CD018C, CD038C, CD050C, CD115C, CD160C, CD165C, CD200C, CD203C. * External Domain: CC013C, CC015C, CC017C, CC025C, CC029C, CC043C, CC044C, CC170C.   **Extract from CC015C:**   |  |  |  |  | | --- | --- | --- | --- | | House Consignment | ~~99x~~**1999x** | R | E1406 |   **Extract from CD018C:**   |  |  |  |  | | --- | --- | --- | --- | | House Consignment | ~~99x~~**1999x** | O | E1406  G0360 |   Additionally, Appendix X ctypes.xsd should be updated for all impacted messages:  **Extract from CD018C:**  <xs:element name="HouseConsignment" minOccurs="0" maxOccurs="~~99~~1999" type="HouseConsignmentType09">  <xs:annotation>  <xs:documentation>  <description value="HOUSE CONSIGNMENT" />  <optionality value="O" />  </xs:documentation>  </xs:annotation> </xs:element>  1b/  The **DDNTA-6.2.0-v1.01 (incl. Appendix Q2), DMP 3-v1.01** **and** the **CSE-60.4.1** shall be corrected as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~ ):  The cardinality of ‘HOUSE CONSIGNMENT’ should be updated from 99x to 1999x in the following NCTS-P6 messages:   * Common Domain: CD001D, CD003D, CD018D, CD038D, CD050D, CD060D, CD115D, CD160D, CD165D, CD200D, CD203D. CDA13D, CDA15D, CDA64D. * External Domain: CC013D, CC015D, CC017D, CC025D, CC029D, CC043D, CC044D, CC060D, CC170D, CCA13D, CCA15D, CCA29D, CCA64D.   **Extract from CC015D:**   |  |  |  |  | | --- | --- | --- | --- | | House Consignment | ~~99x~~**1999x** | R |  |   **Extract from CD018D:**   |  |  |  |  | | --- | --- | --- | --- | | House Consignment | ~~99x~~**1999x** | O | G0360 |   2/  The **DDNTA-5.15.1-v1.00 (incl. Appendix Q2, D), DMP-5.8.0-v1.00** and **CSE-v51.8.2** shall be corrected as follows (addition of **text highlighted in yellow**):  For clarity reasons, a new Guideline shall be introduced to all impacted IEs on the Data Items **/\*/Consignment/House Consignment/Previous Document.Type** and **/\*/Consignment/House Consignment/Consignment Item/Previous Document.Type**, explaining that the value ‘N830’ (Export Declaration) will become valid in CL228 from the end date of the Transitional Period and ‘N830’ shall become invalid in CL214 from that same date. Thus, the following new guideline shall be defined with the following wording:  **G0991**:  **Technical Description**:  N/A  **Functional Description**:  During the Transitional Period, the value ‘N830’ (Goods declaration for exportation) is defined as valid in codelist CL214 (PreviousDocumentType). From the end date of the Transitional Period, the value ‘N830’ will become valid ONLY in the CL228 (PreviousDocumentExportType) to indicate the “Export Followed by Transit” procedure in the Data Group <CONSIGNMENT-HOUSE CONSIGNMENT-PREVIOUS DOCUMENT>.  **Extract from CD015C:**   |  |  |  |  |  | | --- | --- | --- | --- | --- | | **---HOUSE CONSIGNMENT** |  |  |  |  | | **(…)** |  |  |  |  | | **------PREVIOUS DOCUMENT** |  |  |  |  | | Sequence number | R | n..5 |  | R0987 | | Type | R | an4 | CL228 | **G0991** | | Reference number | R | an..70 |  | R0416 | | Complement of information | O | an..35 |  |  |   **(…)**   |  |  |  |  |  | | --- | --- | --- | --- | --- | | **CONSIGNMENT ITEM** |  |  |  |  | | **(…)** |  |  |  |  | | **PREVIOUS DOCUMENT** |  |  |  |  | | Sequence number | R | n..5 |  | R0987 | | Type | R | an4 | CL214 | G0057  R0020  **G0991** | | Reference number | R | an..70 |  | E1104  G0321 | | Goods item number | O | n..5 |  | G0058 | | **(…)** |  |  |  |  | |  |  |  |  |  | |  |  |  |  |  | |  |  |  |  |  | |  |  |  |  |  | |  |  |  |  |  |   **IMPACT ASSESSMENT:**  During the Transitional Period (TP), this RFC-Proposal has no impact on Common nor on External Domain messages since the cardinality is restricted to ‘1x’ through E1406. The proposed change comes into effect from “TPendDate” when the TRT E1406 will be no more restricting the new ‘To Be’ declarations. 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 ECCG **(T-CAB)**:              Together with DDNTA-5.15.2.  **Risk in case of non-implementation:**  If not implemented, when an NA uses more than ‘99x’ iterations of D.G. /\*/Consignment/House Consignment, but the recipient NA has not yet implemented the proposed change, message rejections will occur, movements will be blocked, and the NA shall resort to manual actions to ensure business continuity. This change MUST be applied by all NAs and all traders at the latest on TPendDate.  **Impacted Messages:**  **NCTS P5:**   * Common Domain: CD001C, CD003C, CD018C, CD038C, CD050C, CD115C, CD160C, CD165C, CD200C, CD203C. * External Domain: CC013C, CC015C, CC017C, CC025C, CC029C, CC043C, CC044C, CC170C.   **NCTS P6:**   * Common Domain: CD001D, CD003D, CD018D, CD038D, CD050D, CD060D, CD115D, CD160D, CD165D, CD200D, CD203D. CDA13D, CDA15D, CDA64D. * External Domain: CC013D, CC015D, CC017D, CC025D, CC029D, CC043D, CC044D, CC060D, CC170D, CCA13D, CCA15D, CCA29D, CCA64D.   **Impacted Rules, Conditions & BRTs etc.:**   * **G0991**   **Impacted CI Artefacts:**   * **CSE-v51.8.2: Yes.** * **DDNTA-5.15.1-v1.00 (Appendix X, Q2, D): Yes.** * **DMP Package-v5.8.0-v1.00: Yes**. * DDNTA-5.15.1-v1.00 (Main Document): No. * ACS Main Document: v5.8.0-v1.00 & ACS Annex for NCTS: 5.8.0-v1.00: No. * Functional Specifications NCTS-P5 (FSS/BPM): 5.30.2: No. * DDCOM-20.4.0-v1.00: No. * **CTS-5.8.4-v1.00: Yes.** * TRP-5.12.4: No. (message exchange shall be tested) * **CRP-5.8.4: Yes.** * ieCA 1.0.4.1: No. * CTP-5.10.0-v1.00: 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-v60.4.1**: **Yes** * DDNTA-6.2.0-v1.00 (Main Document): No * **DDNTA-6.2.0-v1.01 (Appendix X, Q2): Yes.** * NCTS-P6 DMP 3-v1.01 Package: No * DDCOM-21-3.0-v1.00: No * CTS for NCTS-P6-1.0.0-v1.00: No * CTP-6.0.0-v1.00: No * TRP-6.0.0-v1.00: No. (message exchange shall be tested) * Functional Specifications NCTS-P6 (FSS/BPM): 7.10.0: No |

**Impact on CI artefacts**

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| **CSE-v51.8.2 & CSE-v60.4.1** | Cosmetic Low  Medium  High  Very High   |  | | --- | | Changing cardinality of ‘House Consignment’ D.G., introducing a new guideline to ‘Previous Document.Type’ D.I.s **as described in Section 3.** | |
| **DDNTA-5.15.1-v1.00 (Appendix X, Q2, D) & DDNTA-6.2.0-v1.01 (Appendix X, Q2)** | Cosmetic Low  Medium  High  Very High   |  | | --- | | Changing cardinality of ‘House Consignment’ D.G., introducing a new guideline to ‘Previous Document.Type’ D.I.s **as described in Section 3.** | |
| **DMP Package-v5.8.0-v1.00 & NCTS-P6 DMP 3-v1.01** | Cosmetic Low  Medium  High  Very High   |  | | --- | | Updates in files Data Mapping\_v0.47 (DMP 5.8.0-v1.00) and NCTS-P5 to P6 Data Mapping\_v1.01 (DMP 3-v1.01), **as described in Section 3.** | |
| **CTS-5.8.2-v1.00** | Cosmetic Low  Medium  High  Very High   |  | | --- | | NCTS CTS should be updated to include the modified ctypes.xsd file**, as described in Section 3.** | |
| **CRP-5.8.1** | Cosmetic Low  Medium  High  Very High   |  | | --- | | The CRP should be updated to include the new CTS. | |

**Estimated impact on National Project**

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| Cosmetic Low  Medium  High  Very High  Short description   |  | | --- | | Structural changes (Increase of Cardinalities) in both Common & External Domain messages, introduction of a new guideline and Codelists CL214 (“PreviousDocumentType”) and CL228 (“PreviousDocumentExportType”) modification for NCTS-P5. Impact should be assessed by each NA. | |

| **Document History** | | | |
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| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFTDEV | 20/03/2023 | Draft by SOFTDEV |
| v0.20 | Draft by SOFTDEV | 11/04/2023 | Cosmetic changes |
| v0.21 | Commented draft | 24/04/2023 | Major comments – Major reworking of the file |
| v0.30 | Implemented comments by DG TAXUD | 06/06/2023 | Implementing comments received by DG TAXUD |
| v0.40 | SfR to DG TAXUD | 27/06/2023 | SfR submission. Implementing additional comments received by DG TAXUD IT. |
| v0.50 | re-SfR to DG TAXUD | 29/06/2023 | re-SfR submission with the right version that implements the recent feedback already received by DG TAXUD |
| v1.00 | SfA to DG TAXUD | 18/07/2023 | SfA submission. Implementing additional comments received by DG TAXUD. |
| v1.01 | SfR-NPM version | 02/10/2023 | *Implementing some extra correction to take into account RFC-List.38. No extra impact on DDNTA.* |
| v1.02 | SfR to DG TAXUD after external review | 06/11/2023 | *NA comments implemented by SOFTDEV* |