# Impact Analysis Report/ RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0157**(RTC-58773) |
| **Related Incident ID** | - |
| **RFC Initiator / Organization** | CD3, DG TAXUD |
| **CI** | **NCTS-P5 (DDNTA-v5.14.1 – CSE-v51.6.0)** |
| **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-v5.14.1 - CSE-v51.6.0) – R0054, R0055 wording updates** |
| The main issue reported by CD3 is that both R0054 and R0055 do not impose a restriction that “Each <Sequence number> is unique for the Data Group it belongs to in messages CD018C, CC017C, CC044C. CD3 consider that the specific restriction should be applied in R0054 and R0055 to be validated similarly with R0987.  For that reason, **R0054** and **R0055** shall be updated in both their Functional and Technical Descriptions. |

**Section 2: Problem Statement**

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| The current Description (Technical/Functional) wording of **R0054** is:    The current Description (Technical/Functional) wording of **R0055** is:    According to the wording of R0054/R0055 as presented in DDNTA-v5.14.1, in control messages, discrepancies can be reported for the same Data Group more than once in the same message, resulting to contradictory control results.   * Rule **R0054** shall be corrected indicating the ‘Sequence number’ shall be unique in the whole message. * Rule **R0055** shall be corrected indicating the Declaration goods item number and Goods item number shall be unique in the whole message.   Thus, discrepancies reported in messages CC017C, CD018C, CC044C will be unique. |

**Section 3: Description of proposed solution**

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| The **DDNTA-v5.14.1 (incl. Appendix Q2) and the CSE-v51.6.0** shall be corrected as follows (addition of **text highlighted in yellow, removal with** ~~red strikethrough~~):  The following updates shall be performed in **R0054 and R0055**:  **R0054:**  **Technical Description:**  Numbering of items:  IF a discrepancy is identified in the Data Group THEN:  - 'Sequence number' shall be unique AND EQUAL to the ~~corresponding~~ sequence number of the Data Group ~~numbering~~ defined in the declaration for which the discrepancy is reported.  IF a new Data Group is identified THEN:  - 'Sequence number' shall be unique AND EQUAL to the number of the last sequence number of the Data Group  + 1 and the rest of the Data ~~Elements~~ Items contained in the Data Group and all sub–Data Groups shall be filled in except for the Data Elements that are defined as optional or dependent in the declaration.  IF the information related to a Data Group is missing ~~identified~~  THEN:  - 'Sequence number' shall be unique AND EQUAL to the sequence number ~~number~~ of the Data Group defined in the declaration  and the rest of the Data ~~Elements~~ Items contained in the Data Group and all sub–Data Groups shall not be filled.  Note: The Sequence number of a Data Group is unique if the XPath and the value of the sequence number of this Data Item is unique in this message.  **Functional Description:**  Numbering of items:  IF a discrepancy is identified in the Data Group THEN:  - 'Sequence number' shall be unique AND EQUAL to the ~~corresponding~~ sequence number of the Data Group ~~numbering~~ defined in the declaration for which the discrepancy is reported.  IF a new Data Group is identified THEN:  - 'Sequence number' shall be unique AND EQUAL to the number of the last sequence number of the Data Group  + 1 and the rest of the Data ~~Elements~~ Items contained in the Data Group and all sub–Data Groups shall be filled in except for the Data Elements that are defined as optional or dependent in the declaration.  IF the information related to a Data Group is missing ~~identified~~  THEN:  - 'Sequence number' shall be unique AND EQUAL to the sequence number ~~number~~ of the Data Group defined in the declaration  and the rest of the Data ~~Elements~~ Items contained in the Data Group and all sub–Data Groups shall not be filled.  Note: The Sequence number of a Data Group is unique if the XPath and the value of the sequence number of this Data Item is unique in this message.  **R0055:**  **Technical Description:**  Numbering of items:  IF a discrepancy is identified in the Data Group THEN:  - ‘Declaration goods item number' shall be unique AND EQUAL to the ~~corresponding Goods item~~  ~~numbering~~ declaration goods item number defined in the declaration for which the discrepancy is reported AND  - 'Goods item number’ shall be unique AND EQUAL to the ~~corresponding Data Group numbering~~  goods item number defined in the ~~D~~declaration for which the discrepancy is reported.  IF a new Data Group is identified THEN:  - ‘Declaration goods item number' shall be unique AND EQUAL to the last ~~corresponding Goods item~~  ~~numbering~~ declaration goods item number defined in the declaration + 1 AND  - 'Goods item number’ shall be unique AND EQUAL to ~~the number of~~ the last ~~sequence number of~~  ~~the Data Group~~ goods item number defined in the declaration + 1 AND  the rest of the Data ~~Elements~~ Items contained in the Data Group and all sub–Data Groups shall be  filled in except for the Data Elements that are defined as optional or dependent in the declaration.  IF a Goods item is missing ~~/Data Group is identified~~ THEN:  - ‘Declaration goods item number' shall be unique AND EQUAL to the number of the ~~Goods item~~  declaration goods item number defined in the declaration AND  - 'Goods item number’ shall be unique AND EQUAL to the ~~number of the~~ ~~Data Group~~ Goods item number defined in the declaration AND the rest of the Data ~~Elements~~ Items contained in the Data Group and all sub–Data Groups shall not be filled.  Note: The Sequence number of a Data Group is unique if the XPath and the value of the sequence number of this Data Item is unique in this message.  **Functional Description:**  Numbering of items:  IF a discrepancy is identified in the Data Group THEN:  - ‘Declaration goods item number' shall be unique AND EQUAL to the ~~corresponding Goods item~~  ~~numbering~~ declaration goods item number defined in the declaration for which the discrepancy is reported AND  - 'Goods item number’ shall be unique AND EQUAL to the ~~corresponding Data Group numbering~~  goods item number defined in the ~~D~~declaration for which the discrepancy is reported.  IF a new Data Group is identified THEN:  - ‘Declaration goods item number' shall be unique AND EQUAL to the last ~~corresponding Goods item~~  ~~numbering~~ declaration goods item number defined in the declaration + 1 AND  - 'Goods item number’ shall be unique AND EQUAL to ~~the number of~~ the last ~~sequence number of~~  ~~the Data Group~~ goods item number defined in the declaration + 1 AND  the rest of the Data ~~Elements~~ Items contained in the Data Group and all sub–Data Groups shall be  filled in except for the Data Elements that are defined as optional or dependent in the declaration.  IF a Goods item is missing ~~/Data Group is identified~~ THEN:  - ‘Declaration goods item number' shall be unique AND EQUAL to the number of the ~~Goods item~~  declaration goods item number defined in the declaration AND  - 'Goods item number’ shall be unique AND EQUAL to the ~~number of the~~ ~~Data Group~~ Goods item number defined in the declaration AND the rest of the Data ~~Elements~~ Items contained in the Data Group and all sub–Data Groups shall not be filled.  Note: The Sequence number of a Data Group is unique if the XPath and the value of the sequence number of this Data Item is unique in this message.  NCTS-Data Mapping- v0.43 file: No impact  **IMPACT ASSESSMENT:**  This IAR concerns changes at sematic level in Common Domain and External Domain messages.  It is considered that the change proposed via the current IAR has impact on business continuity and therefore shall be deployed in a **Big Bang approach**. More specifically:  **Changes at semantic level**  The changes at the semantic level, namely concern the rewording of two rules in Common Domain message CD018C and in External Domain messages CC017C and CD044C.  *With respect to the update of R0054:*   * If the sender is aligned with the proposed changes (DDNTA 5.15.0), each discrepancy will be reported only once in the whole control messages. If the receiver is not aligned with the proposed changes (DDNTA 5.14.1), then no semantic rejection shall be caused. * If the sender is not aligned with the proposed changes (DDNTA 5.14.1), and more than one discrepancy are reported for the same Data Group in control result messages, then a semantic error shall be caused (IE906) due to violation of R0054.   *With respect to the update of R0055:*   * If the sender is aligned with the proposed changes (DDNTA 5.15.0), each discrepancy will be reported only once in the whole control messages. If the receiver is not aligned with the proposed changes (DDNTA 5.14.1), then no semantic rejection shall be caused. * If the sender is not aligned with the proposed changes (DDNTA 5.14.1), and more than one discrepancy are reported for the same Data Group in control result messages, then a semantic error shall be caused (IE906) due to violation of R0055.   **Movement initiated under the previous DDNTA (5.14.1) release which continues its flow under the new DDNTA (5.15.0) release (open movement):** Issue is identified if a movement was initiated under the previous DDNTA (DDNTA 5.14.1) release and continues its flow under the new DDNTA (DDNTA 5.15.0) release (open movement). More specifically, in case an NA is initially not aligned with the proposed changes, the trader at destination is able to report more than one discrepancy for the same Data Group in CC044C messages (as per DDNTA 5.14.1). In case later on and while the movement remains open, the NA becomes aligned with the proposed changes (DDNTA 5.15.0), issue is possible identified, to report the same discrepancies in CD018C message. The workaround of open movements, of this part of the RFC shall be examined at national level by the MSAs.  Note: the scenario is extremely rare to take place since it would require an authorized Consignee to record in CC044C, for the same data item, discrepancies twice (or more).  **Risk of not implementing the change:** In case of not implementing this change, rejections can possibly occur in common domain message CD018C due to the validation failure of R0054 and R0055.  **Proposed** date of applicability in Operations (**T-Ops**):   1.12.2022  **Proposed** date of applicability in CT (**T-CT**):                     July 2022  **Expected** date of approval by ECCG (**T-CAB**):                  January 2022  **Impact on transition**: Yes  **Risk of not implementing the change:** Yes  **Impacted Rules/Conditions, BRTs:**   * R0054 and R0055   **Impacted CIs:**   * **CSE-v51.6.0: Yes;** * **DDNTA-5.14.1-v1.00 (Appendix Q2\_R\_C, PDFs): Yes;** * **DMP Package-v5.6.0 SfA-v1.00: No (incl. update of file Rules and Conditions\_v0.43): Yes;** * **TRP-5.7.: Yes;** * **CTS-5.6.1-v1.00: Yes;** * Functional Specifications (FSS/BPM): No; * DDNTA-5.14.1-v1.00 (Main Document): No; * UCC IA/DA Annex B: No; * CTP-5.7.0-v1.00: No; * CRP-v5.5-v1.00: No; * ACS - v5.5.0 & ACS-Annex-NCTS: 5.5.0: No; * DDCOM v20.3.0-v1.00: No; * ieCA 1.0.1.0: No; * CS/MIS2\_DATA: No; * CS/RD2\_DATA: No; * AES-P1 and NCTS-P5 Long-Lived “Legacy” (L3) Movements Study v1.40: No. |

**Impact on CI artefacts**

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| **DDNTA-v5.14.1 (Appendices)** | Cosmetic  Low  Medium  High  Very High   |  | | --- | | **Appendices generated by CSE + Appendix Q2, Q2\_R\_C** | |
| **CSE-v51.6.0** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Updates as described in section 3.** | |
| **TRP-v5.7.5** | |  | | --- | | Cosmetic  Low  Medium  High  Very High  Short description  **Alignment of messages according to the updates of specifications.** | |
| **DMP Package- v5.6.0 SfA-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Rules and Conditions\_v0.43 file to be updated** | |
| **CTS-5.6.1-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of Conversion Algorithm according to the updates of specifications.** | |

**Estimated impact on National Project**

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|  | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | This IAR concerns changes at sematic level in Common Domain and External Domain messages.  It is considered that the change proposed via the current IAR has impact on business continuity and therefore shall be deployed in a Big Bang approach. | |

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| **Document History** | | |  |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by CUSTDEV | 19/11/2021 |  |
| v0.11 | Updates by CUSTDEV | 15/12/2021 | *Version Update* |
| v1.00 | SfA to NPMs | 27/01/2022 | *Updates of R0054, R0055 in blue.*  *Updates in blue based on APO* |