# Impact Analysis Report/ RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0171** (RTC-59291) |
| **Related Incident ID** | IM472059 / KE21672 |
| **RFC Initiator / Organization** | NA-EE |
| **CI** | **NCTS-P5 (DDNTA-5.14.1-v1.00 – 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: conflict between the C0399, R0350 and R0352 (updates in UCC ANNEX B)** |
| Resolving the conflict between C0399 and R0350 and between C0399 and R0352.  The wording of R0350 is the following (applied on CC013C, CC015C, CC029C):  *IF /\*/TransitOperation/reducedDatasetIndicator> is EQUAL to '1'*  *AND /\*/Consignment/inlandModeOfTransport is in SET {1, 2, 4}*  *THEN at least one /\*/Authorisation/type is EQUAL to 'C524'*  The wording of R0352 is the following (applied on CC013C, CC015C, CC029C):  *IF /\*/TransitOperation/reducedDatasetIndicator> is EQUAL to '1'*  *AND /\*/Consignment/inlandModeOfTransport is in SET {1, 2, 4}*  *THEN*  *this Data Item includes at least one <Authorisation number> for a valid Authorisation for Reduced Data Set owned by the Holder of the Transit Procedure*  The wording of C0399 is the following (applied on CC013C, CC015C, CC029C and also CD001C, CD003C, CC017C, CD038C, CD050C, CD115C, CD160C, CD165C):  *IF /\*/TransitOperation/reducedDatasetIndicator IS EQUAL TO '1'*  *THEN /\*/Consignment/inlandModeOfTransport = "N"*  *ELSE /\*/Consignment/inlandModeOfTransport = "O"*  DG TAXUD/B1 confirmed that a change in UCC ANNEX B was initiated to include the Data Element ‘Inland mode of transport’ in columns D2, D3 and D4 as Optional (with the tag ‘B’). As a result, the NA can give the possibility to the traders to lodge a declaration with *Inland Mode of Transport* also in case of reduced data set indicator EQUAL to '1' (for the traders having such authorization).  Consequently, C0399 will be removed from data item /\*/Consignment/inlandModeOfTransport and the Optionality of Data Item will be changed to Optional ‘O’. |

**Section 2: Problem Statement**

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| In NCTS-P5 DDNTA-5.14.1 (based on CSE-v51.6.0), the following issue was detected:  On the one hand, the ***Inland mode of transport*** MUST be present to identify if the Reduced Data Set can be used (R0350 or R0352).  On the other hand, the ***Inland mode of transport*** MAY NOT be present if the Reduced Data Set is used  **C0399** is assigned on data item /\*/Consignment/inlandModeOfTransport in messages CD001C, CD003C, CC013C, CC015C, CC017C, CC029C, CD038C, CD050C, CD115C, CD160C and CD165C with the following wording:    **R0350** is assigned on data item /\*/Authorisation/type in CC013C, CC015C, CC029C messages with the following wording:    **R0352** is assigned on data item /\*/Authorisation/referenceNumber in CC013C, CC015C, CC029C messages with the following wording:    DG TAXUD/B1 confirmed that a change of UCC ANNEX B was initiated to include the Data Element ‘Inland mode of transport’ in columns D2, D3 and D4 as Optional (with the tag ‘B’).  As a result, the NAs may give the possibility to the traders to lodge a declaration with ***Inland mode of transport*** when the reduced data set indicator EQUAL to '1' (for the trader having such an authorization).  Consequently, **C0399** should be removed from the data item /\*/Consignment/inlandModeOfTransport in messages CD001C, CD003C, CC013C, CC015C, CC017C, CC029C, CD038C, CD050C, CD115C, CD160C and CD165C and the Optionality of Data Item should be changed to Optional ‘O’. |

**Section 3: Description of proposed solution**

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| The **DDNTA-5.14.0-v1.00 (Appendix Q2) and the CSE-v51.6.0** shall be corrected as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~ ):  **C0399** will be removed from the Data Item /\*/Consignment/inlandModeOfTransport and the Optionality of the Data Item will be changed to Optional- ‘O’.  **Part of CD001C:**  (…)  ---CONSIGNMENT 1x R  Country of dispatch D a2 CL008 C0909, G0988  Country of destination D a2 CL008 C0343  Container indicator R n1 CL027  Inland mode of transport ~~D~~ O n1 CL218 ~~C0399~~  Mode of transport at the border D n1 CL218 B1899, C0029, G0020  Gross mass R n..16,6 E1109, R0994  Reference number UCR D an..70 B1895, C0502, G0002  ------CARRIER 1x D C0812, G0090  (…)  The change will be applied in the messages CD001C, CD003C, CC013C, CC015C, CC017C, CC029C, CD038C, CD050C, CD115C, CD160C and CD165C  **DDNTA-5.14.0-v1.00 Main Document**:  The **DDNTA-5.14.1-v1.00 (Main Document)** ***- section I.III.4.3 - Table 4: Justified deviations from UCC Data Annex B [A18]*** will explain that a change of UCC ANNEX B was initiated to include the Data Element ‘Inland mode of transport’ in columns D2, D3 and D4 as Optional (with the tag ‘B’).  ***Note:*** *Please refer to RFC\_NCTS\_0116 (RTC-56497): DDNTA-5.14.1-v1.00 (Main Document): Justified differences again the UCC Annex B*  **DMP Package-5.6.0 SfA-v1.00 (incl. update of the file Rules and Conditions\_v0.43):**  The file will be updated as described above (removal of the C0399, change of optionality).  **Impact on the UPGRADE of messages:** No issue for Upgrade since the optionality of the Data Item ‘Inland mode of transport’ changed to ‘Optional’.  **Impact on the DOWNGRADE of messages:** No issue for Downgrade since the Data Element is not mapped in NCTS P4 (acceptable loss of information during Transitional Period).  **IMPACT ASSESSMENT:**  This RFC-Proposal concerns changes at sematic level in External Domain and in Common Domain messages.  The change defined in this RFC-Proposal shall be applied as soon as possible by the ieCA to minimize the impact on the business continuity.  It shall be implemented as soon as possible by the NA already operating NCTS-P5 (to resolve the contradiction). It must be implemented by the NA starting NCTS-P5 on or after 01/12/2022.    **Situation on the Common Domain in case of flexible implementation**   * If the sender is aligned with the proposed change (DDNTA-5.15.0) and the receiver is still aligned with DDNTA-5.14.1, then a semantic error could be identified (IE906 exchanged) (if the ‘Reduced Dataset Indicator’ is '1' and ‘Inland Mode Of Transport’ is used.   The absence of validation of C0399 by recipient could be an immediate workaround.   * If the sender is still aligned with DDNTA 5.14.1, no risk of error on the Common Domain because the External Domain messages remains blocked by this inconsistency.   No impact identified for L³ movements.  **Risk of not implementing the change:** If some NAs do not implement the change, the declarations lodged by their traders with authorisation will be rejected by their NTA. Some messages received by that NTA from NTAs aligned to RFC-List.36 will be rejected on the common domain (as explained above).      **Proposed** date of applicability in Operations (**T-Ops**):   As soon as possible, at latest on 01/12/2022 or when starting NCTS-P5.  **Proposed** date of applicability in CT (**T-CT**):                     July 2022  **Expected** date of approval by ECCG (**T-CAB**):                  February 2022  **Impact on transition**:  Yes – ieCA/CRP to be amended.  **Risk of not implementing the change:**  Yes – Some few rejections on External/Common Domains    **Impacted Messages:**   * CD001C, CD003C, CD038C, CD050C, CD115C, CD160C and CD165C * CC013C, CC015C, CC017C, CC029C,   **Impacted R&C:**   * C0399 (deleted)   **Impacted CIs:**   * **UCC IA/DA Annex B: Yes;** * **CSE-v51.6.0: Yes;** * **DDNTA-5.14.1-v1.00 (Appendix Q2\_R\_C, PDFs): Yes;** * **DDNTA-5.14.1-v1.00 (Main Document): Yes;** * **CTP-5.8.1-v1.00: Yes;** * **DMP Package-5.6.0 SfA-v1.00 (incl. update of file Rules and Conditions\_v0.43): Yes;** * **TRP-5.8.1: Yes;** * **CRP-v5.5-v1.00: Yes;**    + Functional Specifications (FSS/BPM): No;   + CTS-5.6.1-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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| **CSE-v51.6.0** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **As described in section 3** | |
| **DDNTA-5.14.1  (Appendices)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Appendices generated by CSE + Appendix Q2(XLSX), K (XML)** | |
| **DMP Package-5.6.0 SfA-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **NCTS- Data Mapping- v0.43 file on conversion resolution fields.** | |
| **CTP-5.7.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of scenarios according to the updates of specifications.** | |
| **NCTS\_TRP-5.8.1-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Removal of test case for C0399. Update of DROOLS.** | |

**Estimated impact on National Project**

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|  | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Low impact: de-activation of one Condition. Possible update of the External Domain specifications. | |

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| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by CUSTDEV | 22/12/2021 | *Draft by CUSTDEV* |
| v0.20 | Updated by CUSTDEV | 28/01/2022 |  |
| v1.00 | SfA to NPMs (Emergency) | 07/02/2022 | *Defect identified by NA-EE.* |