# Impact Analysis Report

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0174** (RTC-59807) |
| **Related Incident ID** | IM478984 |
| **RFC Initiator / Organization** | TAXUD/B3 |
| **CI** | **NCTS-P5 (DDNTA-5.14.1 – 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-5.14.1 - CSE-v51.6.0): A PREVIOUS DOCUMENT is required for T2/T2F declarations with Departure in CTC country – Avoiding conversion issue when downgrading (C035 equivalent is required) + Correcting the wording of R0020.** |
| In NCTS-P4 (DDNTA-v20.00) the condition C035 is applied on the Data Group “MESSAGE - GOODS ITEM - PREVIOUS ADMINISTRATIVE REFERENCES” to control the transit of EU goods from CTC counrties:  **C035**  *IF ‘Declaration type’ (box 1) or ‘Declaration type’ (ex box 1) = ‘T2’,’T2F’ and*  *if the Country of the Office of Departure, identified by the first 2 digits of the ‘CUSTOMS OFFICE*  *of Departure Reference Number’ (Box C) = is a non EU common transit country*  *THEN ‘PREVIOUS ADMINISTRATIVE REFERENCES’ = ‘R’*  *ELSE ‘PREVIOUS ADMINISTRATIVE REFERENCES’ = ‘O’*  In NCTS-P5-5.14.0-v1.00 (Appendix Q2) there is no equivalent condition that applies on the Data Group “CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PREVIOUS DOCUMENT”.  This RFC-Proposal introduces the C0035 to prevent a conversion issue in case of downgrade. It also correct the R0020, to get the rule aligned to the legal basis. |

**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 identified:   * there is no Condition equivalent to the **C035** defined in DDNTA-v20.00 (Appendix Q2) where it’s applied on the Data Group “MESSAGE - GOODS ITEM - PREVIOUS ADMINISTRATIVE REFERENCES”. The wording of **C035** is the following:     **C035 is applied on:** IE001, IE003, IE011, IE012, IE013, IE015, IE029, IE038, IE050, IE051 and IE115 messages  In NCTS-P5 (DDNTA-5.14.1-v1.00) there is no equivalent condition applied on the Data Group “CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PREVIOUS DOCUMENT”.  **As a result, a conversion issue is identified in case of downgrade when:**   * the Declaration Type is 'T2' OR ‘T2F’ (at MC level or at HCI level),   AND   * the Customs Office Of Departure is located in a CTC country,   AND   * the Data Group ‘PreviousDocument’ is NOT PRESENT.   As a result, a new Condition should be introduced in NCTS-P5 to resolve the issue, with a similar wording to C035, and applied (at least) to all messages being downgraded: CD001C, CD003C, (CD012C, CC013C, CC015C, CC029C), CD038C, CD050C, CD115C. Thus, the Optionality of the Data Item /\*/Consignment/HouseConsignment/ConsignmentItem/PreviousDocument will be changes from *Optional* to *Dependent*.  2.  The wording of **R0020** should be updated to cover all kind of T2 declarations (it can also be T2F or T with T2 or T2F).  The current working of **R0020** is the following: |

**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 of ~~text with strikethrough~~ ):  1.  The message structure of CD001C will be updated as follows:  (…)  ---------CONSIGNMENT ITEM 9999x R E1402  (…)  ------------PACKAGING 99x R  ------------PREVIOUS DOCUMENT 99x ~~O~~ D C0035  B1000  E1401  G0825  ------------SUPPORTING DOCUMENT 99x O E1407  G0825  (…)  With the **C0035** defined as follows:  **Technical Description:**  IF (/\*/Transit Operation/declarationType is in SET {T2, T2F}  AND the first two characters of /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL112) THEN IF /\*/Consignment/PreviousDocument is PRESENT  THEN /\*/Consignment/HouseConsignment/ConsignmentItem/PreviousDocument = ‘O’  ELSE /\*/Consignment/HouseConsignment/ConsignmentItem/PreviousDocument = ‘R’  for all Consignment Items  ELSE /\*/Consignment/HouseConsignment/ConsignmentItem/PreviousDocument = ‘O’;  IF (/\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is in SET {T2, T2F}  AND the first two characters of /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL112) THEN IF /\*/Consignment/PreviousDocument is PRESENT  THEN /\*/Consignment/HouseConsignment/ConsignmentItem/PreviousDocument = ‘O’  ELSE /\*/Consignment/HouseConsignment/ConsignmentItem/PreviousDocument = ‘R’  for this Consignment Items  ELSE /\*/Consignment/HouseConsignment/ConsignmentItem/PreviousDocument = ‘O’  for this Consignment Items  **Functional Description:**  IF (<TRANSIT OPERATION.Declaration type> is in SET {T2, T2F}  AND the first two characters of <CUSTOMS OFFICE OF DEPARTURE.Reference number> is in SET CL112 (CountryCodesCTC))  THEN IF <CONSIGNMENT-PREVIOUS DOCUMENT> is PRESENT  THEN <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PREVIOUS DOCUMENT> = ‘O’  ELSE <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PREVIOUS DOCUMENT> = ‘R’  for all Consignment Items  ELSE <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PREVIOUS DOCUMENT> = ‘O’;  IF (<CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM.Declaration type> is in SET {T2, T2F}  AND the first two characters of <CUSTOMS OFFICE OF DEPARTURE.Reference number> is in SET CL112 (CountryCodesCTC)) THEN IF <CONSIGNMENT-PREVIOUS DOCUMENT> is PRESENT  THEN <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PREVIOUS DOCUMENT> = ‘O’  ELSE <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PREVIOUS DOCUMENT> = ‘R’  for this Consignment Items  ELSE <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PREVIOUS DOCUMENT> = ‘O’  for this Consignment Items  The same approach will be applied on IE003, IE012, IE013, IE015, IE029, IE038, IE050, IE115, IE160 and IE165.  2.  **R0020** will be updated as follows:  **Technical Description:**  IF /\*/Transit Operation/declarationType is in SET {T2, T2F}  AND the first two characters of /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL112  THEN  (at least one /\*/Consignment/PreviousDocument/type is in SET CL178) OR  (at least one /\*/Consignment/HouseConsignment/ConsignmentItem/PreviousDocument/type is in SET CL178) for each and every Consignment Item;  IF /\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is in SET {T2, T2F}  AND the first two characters of /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL112  THEN  (at least one /\*/Consignment/PreviousDocument/type is in SET CL178) OR  (at least one /\*/Consignment/HouseConsignment/ConsignmentItem/PreviousDocument/type is in SET CL178 for this ‘Consignment item’)  **Functional Description:**  IF <TRANSIT OPERATION.Declaration type> is in SET {T2, T2F}  AND the first two characters of <CUSTOMS OFFICE OF DEPARTURE.Reference  number> is in SET CL112 (CountryCodesCTC)  THEN  (at least one <CONSIGNMENT-PREVIOUS DOCUMENT.Type> is in SET CL178 (PreviousDocumentUnionGoods)) OR  (at least one <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PREVIOUS DOCUMENT.Type> is in SET CL178 (PreviousDocumentUnionGoods)) for each and every Consignment Item;  IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM.Declaration type> is in SET {T2, T2F}  AND the first two characters of <CUSTOMS OFFICE OF DEPARTURE.Reference  number> is in SET CL112 (CountryCodesCTC)  THEN  (at least one /\*/Consignment/PreviousDocument/type is in SET CL178 (PreviousDocumentUnionGoods)) OR  (at least one <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PREVIOUS DOCUMENT.Type> is in SET CL178 (PreviousDocumentUnionGoods)  for this ‘Consignment item’)  **IMPACT ASSESSMENT:**  This defect in NCTS-P5 must be rapidly fixed in all NTA, to avoid that non-EU goods enter as EU-goods in the European Union. Considering the importance of the correction, it must be deployed **on 01.12.2022** by all NAs having started NCTS-P5 operations **(**deployment in a Big Bang approach**)**. Any NTA starting NCTS-P5 after 01.12.2022must e aligned to this correction.    **Impact in case of non-implementation**: This change must be applied. It is not an optional fix.  **Proposed** date of applicability in Operations (**T-Ops**):  01.12.2022  (big-bang)  **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 adapted)  **Risk of not implementing the change:**  Yes (violation of the Common Transit Convention)  **Impacted R&C:**   * R0020 (updated) * C0035   Impacted CI Artefacts:   * **CSE-v51.6.0: Yes;** * **DDNTA-5.14.1-v1.00; (Appendix Q2\_R\_C, Q2 PDFs): Yes;** * **DMP Package-5.6.0-SfA-v1.00: (incl. update of file Rules and Conditions\_v0.43): Yes;** * **NCTS\_TRP-5.8.1-v1.01: Yes;** * **NCTS\_CTP-5.8.0-v1.00: Yes;** * CTS-5.6.1-v1.00: No; * CRP-v5.5-v1.00: No; * ACS - v5.5.0 & ACS-Annex-NCTS: 5.5.0: No; * ieCA 1.0.1.0: No; * CS/MIS2\_DATA: No; * CS/RD2\_DATA: No; * UCC IA/DA Annex B: No; * Functional Specifications (FSS/BPM): No; * DDNTA-5.14.1-v1.00 (Main Document): No; * DDCOM v20.3.0-v1.00: 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-v1.00 (Appendices)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Appendices generated by CSE + Appendix Q2, Q2\_R\_C** | |
| **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** | |
| **NCTS\_TRP-5.8.1-v1.01** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Impact in Drools due to the new Condition. Alignment of messages according to the updates of specifications.** | |
| **CTP-5.8.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of scenarios according to the updates of specifications.** | |

**Estimated impact on National Project**

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|  | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Impact on External Domain and on Common.** | |

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| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by CUSTDEV | 19/01/2021 | *Draft by CUSTDEV* |
| v1.00 | SfA to NPMs | 07/02/2022 | *RFC-Proposal Emergency – Correcting defect identified during the Conformance Testing.* |
| v1.10 | SfA to NPMs | 24/02/2022 | *SfA with implementation details* |