# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_DDCOM\_0020** (RTC-58980) |
| **Related Incident ID** | IM468737 |
| **RFC Initiator / Organization** | DG TAXUD/B3 |
| **CI** | DDCOM 20.3.0-v1.00 |
| **Type of Change** | **Standard** **Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | | New recommendation regarding the possible de-activation & re-activation of rules/conditions for exceptional cases. | |
| **RFC Source** | |  |  | | --- | --- | | **Legal & Policy Change**  **Organisational Changes** | **Business Change**  **IT Change** | |
| **Review by Business User recommended?** | **Yes No** |

***Change Summary***

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| **DDCOM-20.3.0-v1.00 - Rules/Conditions: temporary de-activation of validation by recipient** |
| The ieCA Real Time Exercise highlighted the huge benefits for NECAs & NTAs of the possible de-activation and re-activation of any Rule & Condition on the fly (including TRTs & BRTs). This approach already applied by ieCA should be documented in DDCOM to make it a standard functionality of all NECAs and NTAs, offering more flexibility at national level and contributing to smoother operations. |

**Section 2: Problem statement**

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| During the **ieCA Real Time Exercise**, it was identified that a number of **rejections could be avoided** by de-activating (rapidly, easily and temporarily) the verification by ieCA of the violated Rule or Condition (C/R/TRT/BRT1/BRT2), giving some time for the production and testing of the corrected R&C, loaded in ieCA.  This **ieCA functionality** should not only be applicable by ieCA, but **also by any NTA and NECA**. This should be specified in DDCOM as it is common to both AES and NCTS-P5.  In DDCOM 20.3.0-v1.00, the section “**IV.3.1 Semantic Validation for NCTS-P5 and AES-P1**”, depicts the principles for Rules & Conditions for the messages exchanged (on External Domain and Common Domain). This section should be enhanced in order to specify the handling of R&C validation in case of unexpected and exceptional scenarios that lead to (potentially significant) sending of error messages CD906C.  Indeed, **in** **current operations**, we also observe that a **new release** of a NECA or NTA sometimes includes a **new defect** linked to an incorrect implementation of a Rule or Condition (in the future also TRT and BRT). In the context of the (almost simultaneous) **migration of many countries** from Legacy to To-Be, **some incompatibilities** between the Sender NA and the Recipient NA might escape to the long Conformance Testing.  In particular during the Transitional Period (but also after), it is possible that:   * some received messages are rejected due to a R&C violation linked to a minor *technical* problem … * … but significant *business* impact being minimized if the Recipient NA can receive the message(s) with a minor error. More advantageous to receive partially incorrect message for goods already at the border than to get no data at all in the database (movement blocked, recovery impacted, etc…); * and the correction could take a few days, which could lead to **many movements impacted** and significant **extra-work for the National Helpdesk(s)**.   Once implemented, the NHD of the **Recipient NA** shall be able to **easily de-activate manually** the problematic Rule/Condition and to **re-activate it as soon as possible**. By implementing this functionality, the NAs will avoid the semantic violations and it will process the message as successfully as possible (i.e. **exceptionally** no CD906C). The Rule/Condition must be re-activated as soon as the issue has been fixed by the NA Sender or fixed by the NA Recipient. |

**Section 3: Description of proposed solution**

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| The following updates will be performed into the **DDCOM-20.3.0-v1.00** (~~deleted text strikethrough and red colour~~ and added text in yellow).   **IV.3.1 Semantic Validation for NCTS-P5 and AES-P1** The semantic validation is **crucial** for the quality of each message exchanged, contributing to the correct validation of the whole movement. The Annex K of the DDNxA volumes defines when a validation is *Required*, *Strongly Recommended* or *Not to be applied* (by sender and by recipient).  The quality of the messages exchanged (on the National Domain and on the **Common Domain**) depends on the quality of the messages exchanged on the External Domain (the source) for that movement. The global quality of the trans-European System relies on the effective validation of the R&C by the Recipient NAs (unless not authorised).  In this context, an unexpected issue in operations could require that the Recipient NA(s) needs **to** **deactivate temporarily the validation** of one specific rule/condition/BRT/TRT that is related to the issue identified, until it is fixed.  Each NA may define which R&C can be subject (or not) to such de-activation of the validation.  **IV.3.1.1 Rules/Conditions Validation Principles for External Domain IEs**  The Rules/Conditions validation will be differentiated for External Domain (ED) messages compared to Common Domain (CD) and National Domain (ND) messages. A basic principle is that the ED IEs CCx15C and CC170C are messages acting as declarations with ‘legal’ consequences for the declarant. The Traders’ legal responsibility must not be transferred to the recipient National Customs Applications (NCA) that performs the declaration data validation.  (…)  **IMPACT ASSESSMENT**  **No impact on External Domain.**  This RFC-Proposal is considered as an important ***optimising* improvement** to facilitate the smooth operations during and after the transition from Legacy applications to To-Be applications.  This RFC-Proposal has no impact on the business continuity and can be deployed in a **flexible way**.  **Proposed** date of applicability in Operations (T-Ops): As soon as possible before 1.12.2023  **Proposed** date of applicability in CT (T-CT): N/A  **Expected** date of approval by ECCG (T-CAB): January 2022  **Impact on transition Legacy-ToBe**: Already applied in ieCA.  **Consequence of not approving the RFC-Proposal**: An important feature might not be available for the National Helpdesk teams, to rapidly smooth the operations when a defect pops-up, during and after the Transitional Period.  **Risk of not implementing the change**: Low.  Impacted IEs:   * None   Impacted CI artefacts:   * DDCOM 20.3.0-v1.00: **Yes** |

**Impact on CI artefacts**

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| DDCOM 20.3.0-v1.00 | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Updates as described in section 3. | |

**Estimated impact on National Project**

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| Cosmetic?  Low  Medium  High?  Very High  Short description   |  | | --- | | **Each NA shall assess the impact of this functionality:**   * **If the feature is already implemented by NA: cosmetic, update of the translated DDCOM document.** * **If the feature is not yet implemented by NA: to be evaluated.** | |

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| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by CUSTDEV | 22/11/2021 |  |
| v0.11 | DG TAXUD internal review | 06/12/2021 |  |
| v0.12 | SfR to NPMs | 08/12/2021 |  |
| v1.00 | SfA to NPM | 03/03/2022 | *Comment from ES, DK, NL, PL with ‘No action’* |
| v1.10 | SfA to NPM | 06/04/2022 | *Implementation of #18 DG TAXUD comment from DDCOM 20.4.0 -SfR Review cycle* |