# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

|  |  |
| --- | --- |
| **RFC ID** | **RFC\_NCTS\_0194** (JIRA:UCCNCTS-2547) |
| **Related Incident ID** | **IM540553\_IM552715\_IM555135 / PM24839 / KE22783** |
| **RFC Initiator / Organization** | **NA-LU / NA-CZ / NA-ES** |
| **CI** | **NCTS-P5 (DDNTA-5.15.0-v1.0.0 - CSE-v51.8.0)** |
| **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***

|  |
| --- |
| **NCTS-P5 (CTS-5.7.1-v1.00 for DDNTA-5.15.0-v1.00 - CSE-v51.8.0): Resolving the conflicts between C589 and B1854 for Data Element 'Place of unloading' (when downgrading and upgrading).** |
| a/ When a CTC country (still in NCTS-P4) - *being* *outside* *the Security Area* - receives a Common Domain message for a transit declaration with Safety&Security data, the Data Item ‘Place of unloading, code’ **must be present** (in some cases) based on C589 [IE001, IE003, IE038, IE050, IE115].  On the other hand, the sender (in NCTS-P5) **may not include** the Data Group ‘PLACE OF UNLOADING’, if the receiver is in the Security Agreement Area (as per B1854).  b/ When a country (still in NCTS-P4) sends a Common Domain message for a transit declaration with place of unloading information included and the recipient (in NCTS-P5) is outside the Security Area, the Data Group ‘PLACE OF UNLOADING’ may not be included in the messages CD001C, CD003C, CD038C, CD050C and CD115C (as per B1854).  To eliminate the **conflicts** between DDNTA-v20.00 (P4) and DDNTA-5.15.0(P5) **during the Transitional Period**, the CTS used by the convertor (ieCA or a National convertor)   * shall insert the Data Item ‘Place of unloading, code’ (dummy text) in the P4 messages, if the C589 requires it (downgrade conversion); * shall drop the Data Group ‘PLACE OF UNLOADING’ in the P5 messages if B1854 disables it (upgrade conversion). |

**Section 2: Problem statement**

|  |
| --- |
| One ‘correction’ applied by RFC-List.36 was to add in the wording of the B1854 the statement:  *(…)*  *ELSE IF the last 2 characters of /\*/messageRecipient is NOT in SET CL147*  *THEN /\*/Consignment/PlaceOfUnloading = "N"*  *(…)*  This was a good idea, to ensure that – **after the upgrading** of NCTS-P4 messages by the convertor, like for transit movements involving only NCTS-P5 countries – the 'Place of unloading, code' (a safety and security data element) shall not be communicated to countries outside the Security Agreement Area. So, we apply during the Transitional Period the way of working in the Post-TP.  But, … it was also a bad idea, because some movements involve the sending of messages from an NCTS-P5 country to NCTS-P4 countries located outside the Security Agreement Area. For those cases, the downgrading of messages may trigger an exception because the C589 is violated.  When downgrading a message (e.g. CD038C to CD038B), the NCTS-P4 condition C589 mandates that the Data Item ‘Place of unloading, code’ must be present at Header level, except when the trader is an Authorised economic operator (AEO status).  Wording of **C589** in DDNTA-20.00:    But this information cannot be included in the e.g. CD038B, if the message recipient is located outside the as Security Agreement Area, as defined by the **B1854** in DDNTA-5.15.0-v1.00 (applied on the Data Group ‘PLACE OF UNLOADING’):    This conflict shall generate rejections on the Common Domain. It should be resolved in urgency, by adapting the XSLT files defined in the CTS-5.7.1-v1.00 used by ieCA and applied by other National convertors.  Similarly, when a country (still in NCTS-P4) sends a Common Domain message for a transit declaration with Safety & Security data, the information about the ‘place of unloading, code’ must be present as per C589 (see above). If the recipient (in NCTS-P5) is outside the Security Area, then the Data Group ‘PLACE OF UNLOADING’ may not be included in the messages CD001C, CD003C, CD038C, CD050C and CD115C (as per B1854).  Those two issues impact only five Common Domain messages (i.e. IE001, IE003, IE038, IE050, IE115). |

**Section 3: Description of proposed solution**

|  |
| --- |
| To avoid multiple changes in National transit applications that already completed the Conformance Testing Mode-2, started recently or will start soon, the proposed solution is to adapt the convertor by implementing the below changes.  **Downgrade:**  In the **CTS-5.7.1-v1.00**, a mapping function shall be used to insert the static text ‘**No info, text inserted by Convertor**’ [length = 35 characters] in the Data Item ‘**Place of unloading, code’** [an..35] when downgrading a message from NCTS-P5 to NCTS-P4 (avoiding the violation of C589) as defined below:   1. *IF /\*/TransitOperation/security is EQUAL to ‘0’*   *THEN /\*/Consignment/PlaceOfUnloading = “N”*  --> **No change in CTS:** No data from P5 is downgraded in P4, since C186 is attached on "Place of unloading, code" (i.e. C186 is equivalent to this part of B1854).   1. *ELSE IF the last 2 characters of /\*/messageRecipient is NOT in SET CL147*   *THEN /\*/Consignment/PlaceOfUnloading = "N"*  --> **Change in CTS:** A new CTS function:  IF ‘Security’ is present in P4 message,  THEN CTS will insert the static text ‘**No info, text inserted by Convertor**’ into the Data Item ‘**Place of unloading, code**’.     1. *ELSE IF /\*/TransitOperation/specificCircumstanceIndicator is EQUAL to ‘XXX’*   *THEN /\*/Consignment/PlaceOfUnloading = “O”*  *ELSE /\*/Consignment/PlaceOfUnloading = "R"*  --> **No change in CTS:** No need for static text, since this part of B1854 has the same business meaning as defined by C589.  **Upgrade**  In the **CTS-5.7.1-v1.00**, a mapping function shall be used to drop the information provided in Data Item ‘**Place of unloading, code**’ when upgrading a message from NCTS-P4 to NCTS-P5 in cases where the recipient does not belong to Security Agreement Area (avoiding violation of B1854) as defined below:  1. *ELSE IF the last 2 characters of /\*/messageRecipient is NOT in SET CL147*  *THEN /\*/Consignment/PlaceOfUnloading = "N"*  --> **Change in CTS:** A new CTS function:  IF ‘Place of unloading, code’ is present in P4 message and Message Recipient does not belong to CL147  THEN CTS will drop the information provided in Data Item ‘**Place of unloading, code**’.  In other words, the CTS functions will perform the following actions :   * when downgrading messages CD001C, CD003C, CD038C, CD050C, CD115C: * Check if security is present.  1. If ‘Security’ is NOT present, 🡪 no further action. 2. If ‘Security’ is present, 🡪 check if "/Consignment/PlaceOfUnloading" data exists. 3. If yes, 🡪 this information (P5) will be downgraded (in P4). 4. If no, 🡪 the static text ‘**No info, text inserted by Convertor**’ will be inserted to produce the NCTS-P4 messages.  * when upgrading messages CD001B, CD003B, CD038B, CD050B, CD115B: * Check if unloading place is present.  1. If unloading place is NOT present, 🡪 no further action. 2. If unloading place is present, 🡪 check if Message Recipient" belongs to CL147. 3. If yes, 🡪 this information (P4) will not be upgraded (in P5). 4. If no, 🡪 this information (P4) will be upgraded (in P5).   In addition: the TRP-5.11.1 needs to be modified again, to remove the corrections that were applied (the roll-back of B1854 as per DDNTA-5.14.0-v1.00 enabled a number of test cases without generating the conflict in case of downgrading – it can be seen as a temporary solution).  **IMPACT ASSESSMENT:**  This change affects ONLY the Common Domain messages and has impact on business continuity and on Conformance Testing also. It shall be deployed as urgently as possible (i.e. corrected CRP loaded in ieCA, XSLT re-used by NAs).    **Proposed** date of applicability in Operations (**T-Ops**):   Before starting with NCTS-P5 operations on the Common Domain.  **Proposed** date of applicability in CT (**T-CT**):                     15.01.2023  **Expected** date of approval by ECCG (**T-CAB**):                  21.12.2022  **Risk in case of non-implementation:**  Message rejections during the downgrade and upgrade conversion due to conflicts between C589 and B1854. Some movements will be blocked at the Office of Transit or at the Office of Destination of CTC countries (outside the Security Agreement Area).    **Impacted messages:**   * CD001C, CD003C, CD038C, CD050C, CD115C.   **Impacted Rules, Conditions & BRTs etc.:**   * B1854   **Impacted CI Artefacts:**   * CSE-v51.8.0: No. * DDNTA-5.15.0-v1.00: No**.** * Functional Specifications NCTS-P5 (FSS/BPM): 5.30.2: No. * DDCOM-20.4.0-v1.00: No. * DDNTA-5.15.0-v1.00 (Main Document): No. * **DMP Package-v5.7.0-v1.00: Yes.** * **CTS-5.7.1-v1.00: Yes.** * ACS Main Document: v5.8.0-v1.00 & ACS Annex for NCTS: 5.8.0-v1.00: No. * CTP-5.10.0-v1.00: No. * **TRP-5.11.1: Yes.** * **CRP-5.7.4-v1.00: Yes.** * ieCA 1.0.4.1: 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: No impact [The BRT is not used in DDNTA-6.2.0]** |

**Impact on CI artefacts**

|  |  |  |
| --- | --- | --- |
| **DMP-5.7.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **See section 3. Addition of the reference to the new CTS function in the mapping sheet.** | |
| **TRP-5.11.1 (and related version of CTP-Explorer) (CONF only)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **See section 3. Rolling back of the changes related to B1854.**  **Correction in file** Rules.drl **for B1854.  List of Test Cases impacted/to be adapted:**  TBS-E2E-T-DEP-002\_1, TBS-E2E-T-DEP-002\_2, TBS-E2E-T-DEP-002\_3, TBS-E2E-T-DEP-002\_4, TBS-E2E-T-DEP-002\_5, TBS-E2E-T-DEP-002\_6, TBS-E2E-T-DES-002\_3, TBS-E2E-T-DES-002\_4, TBS-E2E-T-DES-003\_4, TBS-T-CFL-002\_18, TBS-T-CFL-003\_4, TBS-T-CFL-004\_4,  TBS-T-CFL-004\_8, TBS-T-CFL-009\_1, TBS-TC-INC-002\_1, TBS-TC-REC-002\_1, TBS-TC-REC-002\_3, TBS-T-DEP-001\_4,  TBS-T-DEP-002\_1, TBS-T-DEP-002\_3, TBS-T-DEP-002\_4, TBS-T-DEP-003\_6, TBS-T-DES-001\_11, TBS-T-DES-001\_16,  TBS-T-DES-001\_7, TBS-T-DES-001\_9, TBS-T-DES-003\_4,  TBS-T-DES-004\_20, TBS-T-DES-004\_24, TBS-T-DES-004\_26, TBS-T-DPL1-001\_4, TBS-T-ENQ-004\_4, TBS-T-ENQ-005\_1,  TBS-T-ENQ-010\_4, TBS-T-ENQ-013\_4, TBS-T-ENQ-013\_5, TBS-T-GUA-005\_3, TBS-T-GUA-005\_5, TBS-T-INC-001\_5, TBS-T-INC-001\_6, TBS-T-INC-002\_1, TBS-T-INC-002\_7, TBS-T-INC-002\_8, TBS-T-MOS12-001\_4, TBS-T-MOS14b-001\_4, TBS-T-MOS14c-001\_4, TBS-T-MOS31-001\_1, TBS-T-MOS31-001\_12, TBS-T-MOS31-001\_13, TBS-T-MOS31-001\_14, TBS-T-MOS31-001\_15, TBS-T-MOS31-001\_17, TBS-T-MOS31-001\_18, TBS-T-MOS31-001\_19, TBS-T-MOS31-001\_20, TBS-T-MOS31-001\_21, TBS-T-MOS31-001\_22, TBS-T-MOS31-001\_23, TBS-T-MOS31-001\_24, TBS-T-MOS31-001\_25, TBS-T-MOS31-001\_27, TBS-T-MOS31-001\_5, TBS-T-MOS31-001\_8, TBS-T-MOS31-001\_9, TBS-T-REC-002\_1, TBS-T-REC-002\_5, TBS-T-REC-004\_4, TBS-T-REC-005\_4, TBS-T-TRT-003\_21, TBS-T-TRT-005\_1, TBS-T-TRT-005\_10, TBS-T-TRT-005\_11, TBS-T-TRT-005\_12, TBS-T-TRT-005\_4, TBS-T-TRT-005\_7,  TBS-T-TRT-007\_6, TBS-T-TRT-007\_7, TFE-T-B1820\_4,  TFE-T-B1820\_5, TFE-T-B1822\_2, TFE-T-B1823\_3, TFE-T-B1823\_4,  TFE-T-B1831\_2, TFE-T-B1831\_2, TFE-T-B1836\_4, TFE-T-B1836\_4,  TFE-T-B1838\_2, TFE-T-B1838\_2, TFE-T-B1848\_2, TFE-T-B1848\_2,  TFE-T-B1849\_2, TFE-T-B1850\_2, TFE-T-B1874\_2, TFE-T-B1876\_2,  TFE-T-B1890\_2, TFE-T-B1894\_2, TFE-T-B1896\_2, TFE-T-B1896\_2,  TFE-T-B1899\_2, TFE-T-B1899\_2, TFE-T-B1922\_2, TFE-T-C0055\_2,  TFE-T-C0339\_2, TFE-T-CL153\_2, TFE-T-CL172\_2, TFE-T-CL218\_4,  TFE-T-CL232\_2, TFE-T-CL296\_2, TFE-T-CL380\_2, TFE-T-CL754\_2,  TFE-T-E1102\_2, TFE-T-E1103\_2, TFE-T-E1104\_2, TFE-T-E1105\_2,  TFE-T-E1107\_2, TFE-T-E1109\_2, TFE-T-E1111\_2, TFE-T-E1114\_2,  TFE-T-E1117\_2, TFE-T-E1301\_2, TFE-T-E1401\_2, TFE-T-E1406\_2,  TFE-T-E1407\_2, TTV-T-B1805\_2, TTV-T-B1811\_2, TTV-T-B1814\_2,  TTV-T-B1814\_2, TTV-T-B1815\_2, TTV-T-B1832\_2, TTV-T-B1832\_2,  TTV-T-B1834\_2, TTV-T-B1860\_2, TTV-T-B1862\_2, TTV-T-B1895\_2,  TTV-T-B1903\_2, TTV-T-B1908\_2, TTV-T-B1911\_2, TXE-T-004\_16,  TXE-T-004\_17.  **Correction (downgrade) implemented in NCTS-TRP-5.12.1-v1.00. Uploaded in CTA after testing and synchronised with upload of corrected CRP in ieCA.** | |
| **CTS-5.7.1-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Introduction and testing of the new mapping function as defined in section 3 above.**  **CTS-5.7.2-v1.01 includes the downgrade correction (UCCNCTS-3130):**  [**https://circabc.europa.eu/ui/group/74357351-7c61-4729-8f4b-cd92c213ba34/library/ef48fd22-ee34-4564-897b-1cf0c513f8b2/details**](https://circabc.europa.eu/ui/group/74357351-7c61-4729-8f4b-cd92c213ba34/library/ef48fd22-ee34-4564-897b-1cf0c513f8b2/details)  [file uploaded in CIRCABC on 05.01.2023]  **The upgrade and downgrade corrections are included in CTS-5.7.3-v1.00.** | |
| **CRP-5.7.4-v1.00**  **(CONF & PROD)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Update to take into account the change in** Rules.drl **(as per updated TRP (see above) and in CTS-5.7.1-v1.00).** | |

**Estimated impact on National Project**

|  |  |
| --- | --- |
| Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | 1. No impact for the countries using the ieCA. 2. Likely a low impact for the countries not using the ieCA but having their own convertor for the Common Domain messages. Either they re-use the new CTS version, or they adapt and test their own XSLT package. | |

| **Document History** | | | |
| --- | --- | --- | --- |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFTDEV | 28/09/2022 | *Draft by SOFTDEV* |
| v0.20 | Corrections and updates by SOFTDEV | 05/12/2022 | *Implementation of Comments* |
| v0.30 | Corrections and updates by SOFTDEV | 13/12/2022 | *Implemented comments provided by DG TAXUD* |
| v1.00 | SfR to NPMs | 13/12/2022 | *For emergency review by NPMs* |
| v1.00a | SfR2 to NPMs | 15/12/2022 | *Updated list of impacted TC (TRP).* |
| v1.00b | SfR3 to NPMs | 20/12/2022 | *Correction of the CRP release number.* |
| v1.10 | SfA to NPM | 08/01/2023 | ***Considered as accepted following CAB on 21.12.2022.  No change applied compared to v1.00b, except the timing for CT.***  ***Note:*** *Extra info added in green.* |
| v1.20 | SfA to NPMs with implementation details. | 10/03/2023 | *Includes also information and implementation details about the resolution of the issue for* ***upgrade*** *conversion.*  *Corrections with track changes visibles)* |