# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0219** (JIRA:UCCNCTS-3221) |
| **Related Incident ID** | **IM492626** |
| **RFC Initiator / Organization** | **NA-CH / DG TAXUD** |
| **CI** | **NCTS-P5 (DDNTA-5.15.1-v1.00 – CSE-v51.8.2)**  **implemented in DDNTA-5.15.2-v1.00(SfR-NPM) – CSE-v51.8.4** |
| **Type of Change** | **Standard**  **Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | | **Alignment with legal text (CTC Annex A1a), to include the Data Item ‘Country of dispatch’ for all declaration types.** | |
| **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-5.15.1-v1.00 - CSE-v51.8.2): Correction to get the “Country of dispatch” no more dependent, as defined in the CTC Convention (i.e., not only for declaration type ‘TIR’).** |
| To get the DDNTA-5.15.2-v1.00 aligned with the **Convention on a Common transit procedure (Annex A1a)**, the Data Item “Country of dispatch”is no longer restricted to the declarations type ‘TIR’. Condition C0909 shall be updated and will be applicable after the Transitional Period. Transitional rule E1301 ensures that the CD050C, CD115C, CD160C and CD165C are **not impacted during Transitional Period**. Additionally, transitional rule B1965 is introduced to maintain the current situation on the transit declaration and related messages during the Transitional Period until C0909 becomes enabled. |

**Section 2: Problem statement**

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| The NCTS-P5 **DDNTA-v5.15.1-v1.00** (based on CSE-v51.8.2) already includes the Data Item **'Country of dispatch'** in the following messages CC013C, CC015C, CC017C, CC029C and CD001C, CD003C, CD038C:  Extract of CD001C    With the condition C0909 attached (at all levels):    In UCC DA Annex B, the data item appears in all three (3) levels of the message and is considered Optional with the usage related **only** to the TIR Carnet:  However, the ‘Consolidated text: Convention on a Common transit procedure’ ([Document 01987A0813(01) of 20/10/2022](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A01987A0813%2801%29-20221020)) defines that this data item is **mandatory** (it must appear in one of the three levels), **without** any reference or limitation to the TIR Carnet:    In conclusion:   1. Both the UCC DA Annex B and the DDNTA should be aligned to the **Convention on Common transit procedure** for the data item ‘Country of dispatch’. A related change request for **UCC DA Annex B** has already been initiated by DG TAXUD/B1. 2. The wording of condition C0909 should be updated, to decouple the data item ‘Country of dispatch’ from the TIR Carnet. 3. A new BRT1 will maintain the current wording of C0909 only during TP. After TP the amended C0909 will be enforced.   This change would also impact the messages CD050C, CD115C, CD160C and CD165C, to re-use also in those messages the information provided by the Holder of the Transit Procedure. |

**Section 3: Description of proposed solution**

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| In **DDNTA-5.15.1-v1.0.0 (incl. Appendix Q2)** and the **CSE-v51.8.2**, the following updates should be performed (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~):  **1) Message structure** of CD050C, CD115C, CD160C and CD165C messages will be updated to include the data item ‘Country of dispatch’ in all message levels, similar to CD001C. The structure will be updated as follows:  ---CONSIGNMENT 1x R  **Country of dispatch D a2 CL008 C0909 E1301 G0988**  Country of destination D a2 CL008 C0343  (…)  ------HOUSE CONSIGNMENT\* **19**99x R E1406  Sequence number R n..5 R0987  **Country of dispatch D a2 CL008 C0909 E1301 G0062 G0988**  Country of destination D a2 CL008 C0343 E1301 G0062 G0113  Gross mass R n..16,6 B1912 R0983  (…)  ---------CONSIGNMENT ITEM 999x R  (…)  Declaration type D an..5 CL232 B1922 C0045 G0062 R0601 R0909  **Country of dispatch D a2 CL008 C0909 E1301 G0062 G0988**  Country of destination D a2 CL008 C0343 G0062  (…)  **\*NOTE:** The changes in this Data Group also depict the changes for the ‘Country of destination’ as per ‘RFC\_NCTS\_ 0220\_IAR-UCCNCTS-3912’ and for the multiplicity of House Consignment as per ‘RFC\_NCTS\_0223\_IAR-UCCNCTS-3442’.  **2) The messages** CD001C, CD003C, CC013C, CC015C, CC017C, CC029C and CD038C will be updated, to validate the condition C0909 from ‘TPendDate’, and to get the information about the ‘Country of dispatch’ required at one of the three (3) levels. The Appendix Q2 will be updated as follows:  For the messages **CD001C**, **CD003C**, and **CD038C:**  (…)  ---CONSIGNMENT 1x R  Country of dispatch D a2 CL008 **B1965** C0909 G0988  Country of destination D a2 CL008 C0343  (…)  ------HOUSE CONSIGNMENT\* **19**99x R E1406  Sequence number R n..5 R0987  Country of dispatch D a2 CL008 B1032 C0909G0062 G0988  Country of destination D a2 CL008 C0343 E1301 G0062 G0113  Gross mass R n..16,6 B1912 R0983  (…)  ---------CONSIGNMENT ITEM 999x R  (…)  Declaration type D an..5 CL232 B1922 C0045 G0062 R0601 R0909  Country of dispatch D a2 CL008 **B1965** C0909 G0062G0988  Country of destination D a2 CL008 C0343 G0062  (…)  **\*NOTE:** The changes in this Data Group also depict the changes for the ‘Country of destination’ as per ‘RFC\_NCTS\_ 0220\_IAR-UCCNCTS-3912’ and for the multiplicity of House Consignment as per ‘RFC\_NCTS\_0223\_IAR-UCCNCTS-3442’.  For the messages **CC013C, CC015C:**  ---CONSIGNMENT 1x R  Country of dispatch D a2 CL008 **B1965** C0909G0988  Country of destination D a2 CL008 C0343  (…)  ------HOUSE CONSIGNMENT\* **19**99x R E1406  Sequence number R n..5 R0987  Country of dispatch D a2 CL008 **B1965** C0909 E1301 G0988 R0506  Country of destination D a2 CL008 C0343 E1301 R0506 G0062 G0113  Gross mass R n..16,6 B1912 R0983  (…)  ---------CONSIGNMENT ITEM 999x R  (…)  Declaration type D an..5 CL232 B1922 C0045 G0062 R0601 R0909  Country of dispatch D a2 CL008 **B1965** C0909G0988 R0507  Country of destination D a2 CL008 C0343 G0062  (…)  For the messages **CC029C:**  ---CONSIGNMENT 1x R  Country of dispatch D a2 CL008C0909G0988  Country of destination D a2 CL008 C0343 G0113  (…)  ------HOUSE CONSIGNMENT\* **19**99x R  Sequence number R n..5 R0987  Country of dispatch D a2 CL008 **C0909** G0988  Country of destination D a2 CL008 C0343 E1301 G0062 G0113 R0506  Gross mass R n..16,6 R0983  (…)  ---------CONSIGNMENT ITEM 999x R  (…)  Declaration type D an..5 CL232 B1922 C0045 G0062 R0601 R0909  Country of dispatch D a2 CL008 C0909G0988  Country of destination D a2 CL008 C0343 G0062  (…)  **\*NOTE:** The changes in this Data Group also depict the changes for the ‘Country of destination’ as per ‘RFC\_NCTS\_ 0220\_IAR-UCCNCTS-3912’ and for the multiplicity of House Consignment as per ‘RFC\_NCTS\_0223\_IAR-UCCNCTS-3442’.  For message **CC017C** the structure will be updated as follows:  ------HOUSE CONSIGNMENT\* **19**99x O G0360  Sequence number R n..5 R0054  Country of dispatch D a2 CL008 **C0909** G0042 G0988  Country of destination D a2 CL008 C0343 G0042  Gross mass O n..16,6 G0360  (…)  **\*NOTE:** The changes in this Data Group also depict the changes for the ‘Country of destination’ as per ‘RFC\_NCTS\_ 0220\_IAR-UCCNCTS-3912’ and for the multiplicity of House Consignment as per ‘RFC\_NCTS\_0223\_IAR-UCCNCTS-3442’.  Where the existing **C0909** will be updated as follows:  **Technical Description:**  ~~IF /\*/TransitOperation/declarationType is EQUAL to 'TIR'~~  ~~THEN~~  IF /\*/Consignment/countryOfDispatch is PRESENT  THEN  /\*/Consignment/HouseConsignment/countryOfDispatch = "N" AND  /\*/Consignment/HouseConsignment/ConsignmentItem/countryOfDispatch = "N"  ELSE IF /\*/Consignment/HouseConsignment/countryOfDispatch is PRESENT  THEN  /\*/Consignment/HouseConsignment/ConsignmentItem/countryOfDispatch = "N"  ELSE  /\*/Consignment/HouseConsignment/ConsignmentItem/countryOfDispatch = "R"  ~~ELSE~~  ~~/\*/Consignment/countryOfDispatch= "N" AND~~  ~~/\*/Consignment/HouseConsignment/countryOfDispatch = "N" AND~~  ~~/\*/Consignment/HouseConsignment/ConsignmentItem/countryOfDispatch = "N~~"  **Functional Description:**  ~~IF <TRANSIT OPERATION.Declaration type> is EQUAL to 'TIR'~~  ~~THEN~~  IF <CONSIGNMENT.Country of dispatch> is PRESENT  THEN  <CONSIGNMENT-HOUSE CONSIGNMENT.Country of dispatch> = "N" AND  <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM.Country of dispatch> = "N"  ELSE IF <CONSIGNMENT-HOUSE CONSIGNMENT.Country of dispatch> is PRESENT  THEN <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM.Country of dispatch> = "N"  ELSE  <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM.Country of dispatch> = "R"  ~~ELSE~~  ~~<CONSIGNMENT.Country of dispatch> = "N" AND~~  ~~<CONSIGNMENT-HOUSE CONSIGNMENT.Country of dispatch> = "N" AND~~  ~~<CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM.Country of dispatch> = "N"~~  where the existing **E1301** will be updated as follows:  **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN  /\*/Consignment/countryOfDispatch AND  /\*/Consignment/PreviousDocument AND  /\*/Consignment/SupportingDocument AND  /\*/Consignment/TransportDocument AND  /\*/Consignment/AdditionalReference AND  /\*/Consignment/AdditionalInformation AND  /\*/Consignment/HouseConsignment/countryOfDispatch AND  /\*/Consignment/HouseConsignment/countryOfDestination AND  /\*/Consignment/HouseConsignment/referenceNumberUCR AND  /\*/Consignment/HouseConsignment/Consignor AND  /\*/Consignment/HouseConsignment/Consignee AND  /\*/Consignment/HouseConsignment/DepartureTransportMeans AND  /\*/Consignment/HouseConsignment/PreviousDocument AND  /\*/Consignment/HouseConsignment/SupportingDocument AND  /\*/Consignment/HouseConsignment/TransportDocument AND  /\*/Consignment/HouseConsignment/AdditionalReference AND  /\*/Consignment/HouseConsignment/AdditionalInformation AND  /\*/Consignment/HouseConsignment/TransportCharges AND  /\*/Consignment/HouseConsignment/ConsignmentItem/countryOfDispatch AND  /\*/GuaranteeReference/Guarantor/AgentInCountryOfCompetentAuthority  shall not be used  Functional Description:  N/A  where the **existing G0062** remains **unchanged**:  The rules R0506 and R0507 are applied on CC015C and CC013C to ensure that the declaration does not include unnecessary and repetitive information. They must be enforced by all NTA. Considering the possibility that one Goods Item is taken out from the declaration during the control, the message CC029C and CD001C may have different content from CC015C (or CC013C or CC170C). Consequently, those rules R0506 and R0507 shall not be strictly enforced on the Common Domain messages. Certainly not by the recipient of the CD message, likely not by the sender of the CD message.  where the **existing G0988** remains **unchanged**:  The Country of dispatch can be different from the Country defined in the address of the Consignor.  where the **new** ***B1965*** is defined as follows:  **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN C0909 attached to /\*/Consignment/countryOfDispatch AND  to /\*/Consignment/HouseConsignment/countryOfDispatch AND  to /\*/ConsignmentHouseConsignment/ConsignmentItem/countryOfDispatch  shall be disabled  AND  IF /\*/TransitOperation/declarationType is EQUAL to 'TIR'  THEN  IF /\*/Consignment/countryOfDispatch is PRESENT  THEN /\*/Consignment/HouseConsignment/countryOfDispatch = "N" AND  /\*/Consignment/HouseConsignment/ConsignmentItem/countryOfDispatch = "N"  ELSE IF /\*/Consignment/HouseConsignment/countryOfDispatch is PRESENT  THEN /\*/Consignment/HouseConsignment/ConsignmentItem/countryOfDispatch = "N"  ELSE /\*/Consignment/HouseConsignment/ConsignmentItem/countryOfDispatch = "R"  ELSE  /\*/Consignment/countryOfDispatch= "N" AND  /\*/Consignment/HouseConsignment/countryOfDispatch = "N" AND  /\*/Consignment/HouseConsignment/ConsignmentItem/countryOfDispatch = "N"  **Functional Description**  N/A  The validation of the existing condition **C0909** in messages **CD003C** and **CD038C** will be updated in the **DDNTA-5.15.1-v1.00, Appendix K** as follows:   |  |  |  | | --- | --- | --- | | **TMS Path** | **Validated by Sender** | **Validated by Recipient** | | MESSAGE / CONSIGNMENT.Country of dispatch (a2) | R | ~~SR~~ **N** | | **MESSAGE / CONSIGNMENT / HOUSE CONSIGNMENT.Country of dispatch (a2)** | **R** | **N** | | MESSAGE / CONSIGNMENT / HOUSE CONSIGNMENT / CONSIGNMENT ITEM.Country of dispatch (a2) | R | ~~SR~~ **N** |   The validation of the existing condition **C0909** in message **CD001C, CD050C, CD160C** will be updated in the **DDNTA-5.15.1-v1.00, Appendix K** as follows:   |  |  |  | | --- | --- | --- | | **TMS Path** | **Validated by Sender** | **Validated by Recipient** | | MESSAGE / CONSIGNMENT.Country of dispatch (a2) | R | SR | | **MESSAGE / CONSIGNMENT / HOUSE CONSIGNMENT.Country of dispatch (a2)** | **R** | **SR** | | MESSAGE / CONSIGNMENT / HOUSE CONSIGNMENT / CONSIGNMENT ITEM.Country of dispatch (a2) | R | SR |   The validation of the existing condition **C0909** in message **CD115C, CD165C** will remain in the **DDNTA-5.15.1-v1.00, Appendix K** as follows:   |  |  |  | | --- | --- | --- | | **TMS Path** | **Validated by Sender** | **Validated by Recipient** | | MESSAGE / CONSIGNMENT.Country of dispatch (a2) | R | N | | **MESSAGE / CONSIGNMENT / HOUSE CONSIGNMENT.Country of dispatch (a2)** | **R** | **N** | | MESSAGE / CONSIGNMENT / HOUSE CONSIGNMENT / CONSIGNMENT ITEM.Country of dispatch (a2) | R | N |   For the introduction of the new BRT-1 B1965 in messages CD001C, CD003C, and CD038C, the **DDNTA 5.15.1-v1.00, Appendix K** will be updated as follows:   |  |  |  | | --- | --- | --- | | **TMS Path** | **Validated by Sender** | **Validated by Recipient** | | **MESSAGE / CONSIGNMENT.Country of dispatch (a2)** | **R** | **R** | | **MESSAGE / CONSIGNMENT / HOUSE CONSIGNMENT.Country of dispatch (a2)** | **R** | **R** | | **MESSAGE / CONSIGNMENT / HOUSE CONSIGNMENT / CONSIGNMENT ITEM.Country of dispatch (a2)** | **R** | **R** |   **Impact Assessment:**  This RFC-Proposal updates the structure of several messages exchanged over the Common Domain. It is necessary to enforce compatibility between all National Transit Application, taking advantage of the BRT E1301 and B1965. It must be deployed (at any time) ***before or on* TPendDate** (defined in CS/RD2-PROD CL990, expected to be defined based on the next version of UCC WP as ‘21.01.2025’).  **Proposed** date of applicability in Operations (T-Ops): **TPendDate**, as defined in CS/RD2-CL990.  **Proposed** date of applicability in CT (T-CT): 2024Q2 (precise date to be confirmed)  **Expected** date of approval by NPMs (T-CAB): Together with DDNTA-5.15.2.  **Risk in case of non-implementation**:   * Movements will be blocked and manual BCP would be required (Common Domain messages will be rejected). * **This change MUST be applied by all NAs and by all traders at the latest on TPendDate.**   **Impacted Messages:**   * Common Domain: CD001C, CD003C, CD038C, CD050C, CD115C, CD160C, CD165C * External Domain: CC013C, CC015C, CC017C, CC029C   **Impacted Rules/Conditions, BRTs:**   * E1301 (Updated TRT). * B1965 (New BRT-1). * C0909 (Updated Condition).     **Impacted CI Artefacts:**   * **CSE-v51.8.2: Yes.** * **DDNTA-5.15.1-v1.00 (only Appendices D, K, Q2, Q2\_R\_C): Yes.** * Functional Specifications NCTS-P5 (FSS/BPM): 5.30.2: No. * DDCOM-20.4.0-v1.00: No. * DDNTA-5.15.1-v1.00 (Main Document): No. * **DMP Package-v5.8.0-v1.00: Yes.** * CTS-5.8.4-v1.00: No. * ACS Main Document: v5.8.0-v1.00 & ACS Annex for NCTS: 5.8.0-v1.00: No. * **CTP-5.10.0-v1.00: Yes.** * **TRP-5.13.5-v1.01: Yes.** * CRP-5.8.3 (DROOLS): Νο. (only to keep the latest version of rules.drl (DROOLS) synchronized with TRP) * ieCA 1.0.4.1: No. * CS/MIS2\_DATA: No. * CS/RD2\_DATA: No. * **UCC IA/DA Annex B: Yes.**   **NCTS-P6: Yes** (a dedicated RFC is created to ensure consistency and operational continuity). |

**Impact on CI artefacts**

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| **DDNTA-5.15.1-v1.00 (Appendices)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **See section 3. The Appendices Q2 (PDF), K (PDF and xlsx) are generated by SpecsManager. Manual update of Appendices D and Q2\_R\_C for the B1965, E1301 and the introduction of D.I. ‘Country of dispatch’ in messages CD050C, CD115C, CD160C and CD165C via CSE.** | |
| **CSE-v51.8.2 & CSE-v60.4.1** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **D.I. ‘Country of dispatch’ will be added to messages CD050C, CD115C, CD160C and CD165C. E1301 will be updated and B1965 will be introduced, as described in section 3.** | |
| **DMP-5.8.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Since the change mainly involves the Post-TP, the mapping is not affected. The structure of messages simply needs to be updated: CD001C, CD003C, CD012C, CD013C, CD015C, CD017C, CD029C, CD038C, CD050C, CD115C, CD160C, CD165C as described in section 3.** | |
| **TRP-5.13.5-v1.01 (including CTP-5.10.0-v1.00)** | Cosmetic  Low  Medium  High  Very High  Note: No modifications will be made to TRP-5.13.x. The change will be incorporated into TRP-5.14.0. Draft impact on CTP/TRP identified at this stage:   |  |  |  | | --- | --- | --- | | **Update TC:** | **n/a** | **n/a** | | **New Test Cases:** | **Yes** | **A new test case will be introduced** | | **Updated Drools:** | **Yes** | **Update in file** Rules.drl **for B1965 & C0909.** | | **Other:** | **n/a** | **n/a** | |
| **UCC IA/DA Annex B** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Update is needed to take into account the alignment to the Convention on Common transit procedure for the data item ‘Country of dispatch’. A related change request for UCC DA Annex B has already been initiated by DG TAXUD/B1.** | |

**Estimated impact on National Project**

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| Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | To be assessed precisely by each NA.  Proposed *Medium* because it affects the External Domain and some Common Domain messages also. | |

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| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFTDEV | 15/09/2023 | *Draft by SOFTDEV* |
| v1.00 | SfA to DG TAXUD | 18/09/2023 | *SfA Submission. Updating all section by implementing DG TAXUD comments.* |
| v1.01 | SfA to DG TAXUD | 20/09/2023 | *SfA Submission. Updating all section by implementing DG TAXUD comments.* |
| v1.02 | Commented by DG TAXUD | 22/09/2023 | *Comment with track changes – Version 1.03.* |
| v1.03 | Implementation of comments | 25/09/2023 | *Comments implemented by SOFTDEV and track changes removed.* |
| v1.04 | Commented by DG TAXUD | 26/09/2023 | *TC – were not fully removed + New comments with track changes – Version 1.05 expected.* |
| v1.05 | Implementation of comments | 26/09/2023 | *Comments implemented by SOFTDEV and track changes removed.* |
| v1.06 | SfR-NPM version | 02/10/2023 | *Implementing some extra corrections, expected also to be applied in DDNTA-5.15.2-v1.10.* |
| v1.07 | SfR to DG TAXUD after external review | 06/11/2023 | *NA comments implemented by SOFTDEV.* |
| v1.08 | Commented by DG TAXUD | 08/11/2023 | *New comments– Version 1.09 expected.* |
| v1.09 | Implementation of comments | 11/11/2023 | *Comments implemented by SOFTDEV* |