# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

|  |  |
| --- | --- |
| **RFC ID** | **RFC\_NCTS\_0110** (RTC-52789) |
| **Related Incident ID** | IM428779 |
| **RFC Initiator / Organization** | NA-BE |
| **CI** | NCTS-P5 (DDNTA-5.14.1-v1.00 - Main Document) |
| **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***

|  |
| --- |
| **DDNTA-5.14.1-v1.00 (Main Document): NCTS P5 Pre-lodged Transit Declaration selected for control and the values *Notification Type* of the IE060 (before and after acceptance of the transit declaration)** |
| The DDNTA Main Document needs to be updated to show the IE060 as a **self-transition** to the status ‘**Pre-Lodged**’. It is also required to clarify the values that should be sent with the IE060 for the data item ‘**Notification type**’ *before* and *after* the acceptance of the transit declaration. |

**Section 2: Problem statement**

|  |
| --- |
| The **Figure 122: State Transition Diagram for Office of Departure (until release of movement)**, does not specify that - when the state is “Pre-Lodged” - the IE060 message is sent to the Holder of the Transit Procedure (in case of AEO) for a pre-lodged transit declaration (before acceptance) in order to notify the Holder of the Transit about the intention of control. In such case, the status of the transit movement remains “**Pre-Lodged**”.  The Appendix N does not mention the exchange of IE060    The DDNTA Main Document should be updated for each scenario where the IE060 is involved to show which value is applicable per case for the data element ‘’Notification type’ (i.e. which value applies from the CL384 that is assigned on the IE060). |

**Section 3: Description of proposed solution**

|  |
| --- |
| The following update will be performed into the **DDNTA-5.14.1-v1.00 (Main Document)** (changes are depicted in red colour):   1. The IE060 message will be added to the **State Transition Diagram of the Office of Departure (until release of movement)**:    * The **Figure 122: State Transition Diagram for Office of Departure (until release of movement)** will be updated to display the IE060 message as a self-transition to the status “Pre-Lodged”. 2. The following text below the **Figure 122: State Transition Diagram for Office of Departure (until release of movement)** will be updated as follows:   For each ‘Declaration Data’ E\_DEC\_DAT (IE015) that is syntactically and semantically valid, the message ‘Positive Acknowledge’ E\_POS\_ACK (IE928) is sent to the Holder of the Transit Procedure and:   * + if the ‘Declaration Data’ E\_DEC\_DAT (IE015) is a pre-lodged declaration, the movement status is set to “Pre-Lodged”~~;~~:   + ~~if the ‘Declaration Data’ E\_DEC\_DAT (IE015) is a ‘full’ declaration, the movement status is set to “Submitted”.~~     - For the movement in status “Pre-Lodged”, and following the risk analysis, the Office of Departure may intend to control the transit movement. For this reason, the Office of Departure notifies the Holder of the Transit Procedure (provided that they are an AEO) about the ‘intention to control’ with the ‘Control Decision Notification’ E\_CTR\_DEC (IE060) message (having the data element TRANSIT OPERATION-Notification type = ‘2-Intention to Control’). The state remains “Pre-Lodged”;     - Upon reception of the ‘Presentation Notification for the Pre-Lodged Declaration’ E\_PRE\_NOT (IE170) message from the Holder of the Transit Procedure, the ‘MRN Allocated’ E\_MRN\_ALL (IE028) message is sent back to the Holder of the Transit Procedure and the movement status is set to “Accepted”~~.~~;     - The Holder of the Transit Procedure has the right to correct the pre-lodged transit declaration multiple times while the timer “Awaiting Presentation Notification” is still running. For this reason, the Holder of the Transit Procedure sends the ‘Declaration amendment’ E\_DEC\_AMD (IE013) message. The ‘Amendment acceptance’ E\_AMD\_ACC (IE004) message is sent back to acknowledge the valid amendment to the Holder of the Transit Procedure or the ‘Rejection from Office of Departure’ E\_DEP\_REJ (IE056) message is sent back to notify about the invalid amendment (please refer to Table 33 of DDCOM [A3] for applicable Functional Error Codes). In all cases, the movement status remains as “Pre-Lodged”~~.~~;     - The Holder of the Transit Procedure has the right to cancel the pre-lodged transit declaration while the timer “Awaiting Presentation Notification” is still running. For this reason, the Holder of the Transit Procedure sends the ‘Declaration Invalidation Request’ E\_DEC\_INV (IE014) message. The ‘Invalidation Decision’ E\_INV\_DEC (IE009) message is sent back to Holder of the Transit Procedure. If it is positive the movement status is set to “Cancelled”, otherwise if it is negative the movement status remains “Pre-Lodged”.     - ~~For the movement in status “Submitted”, after further validation of the ‘Declaration Data’ E\_DEC\_DAT (IE015), the ‘MRN Allocated’ E\_MRN\_ALL (IE028) message is sent to the Holder of the Transit Procedure and the movement status is set to “Accepted”;~~  1. The following texts will be updated to indicate the applicable value from the CL384 when the IE060 message is sent to the Holder of the Transit Procedure:  * The following paragraph of the section **III.II.2.1 Declaration Lodged Prior to Presentation of Goods** will be updated as follows:   After the risk analysis, the Office of Departure may control the movement and for this reason, the Holder of the Transit Procedure (provided that they are an AEO) is notified about the intention of the Customs Officer to potentially control the goods with the ‘Control Decision Notification’ E\_CTR\_DEC (IE060) message (having the data element TRANSIT OPERATION-Notification type = ‘2-Intention to Control’).   * The following scenario **III.II.2.1.1 T-TRA-DEP-A-003-Transit presentation notification valid** will be updated as follows:   **[Step 4]** Following the result of the Risk Analysis engine, the Office of Departure may select the pre-lodged declaration for potential control of the goods prior to their presentation. In such case, the Office of Departure notifies the Holder of the Transit Procedure (provided that they are an AEO) about the intention to potentially control the goods, via the ‘Control Decision Notification’ E\_CTR\_DEC (IE060) message (having the data element TRANSIT OPERATION-Notification type = ‘2-Intention to Control’).   * The following scenario **III.II.2.1.2 T-TRA-DEP-A-002-Correction of the pre-lodged declaration prior to presentation of goods** will be updated as follows:   **[Step 7]** Following the result of the Risk Analysis engine, the Office of Departure may select the pre-lodged declaration for potential control of the goods prior to their presentation. In such case, the Office of Departure notifies the Holder of the Transit Procedure (provided that they are an AEO) about the intention to potentially control the goods, via the ‘Control Decision Notification’ E\_CTR\_DEC (IE060) message (having the data element TRANSIT OPERATION-Notification type = ‘2-Intention to Control’).   * The following scenario **III.II.2.5 T-TRA-DEP-M-006-Control by Office of Departure with release for transit** will be updated as follows:   **[Step 6]** The Office of Departure sends the ‘Control Decision Notification’ E\_CTR\_DEC (IE060) message to the Holder of the Transit Procedure to notify about the upcoming control activities (having the data element TRANSIT OPERATION-Notification type = ‘0-Decision to Control (and requested documents if needed)’). The state of the movement at the Office of Departure is set to [Under control](#_Office_of_Departure).   * The following scenario **III.II.2.6.1 T-TRA-DEP-A-007-Positive release request with release for transit** will be updated as follows:   **[Step 6]** The Office of Departure sends the ‘Control Decision Notification’ E\_CTR\_DEC (IE060) message to the Holder of the Transit Procedure in order to notify about the upcoming control activities (having the data element TRANSIT OPERATION-Notification type = ‘0-Decision to Control (and requested documents if needed)’). This message is sent in both cases of Normal and Simplified Procedures. The state of the movement at the Office of Departure is set to [Under control](#_Office_of_Departure).   * The following scenario **III.II.2.6.3 T-TRA-DEP-E-009-Release request rejected** will be updated as follows:   **[Step 6]** The Office of Departure sends the ‘Control Decision Notification’ E\_CTR\_DEC (IE060) message to the Holder of the Transit Procedure in order to notify about the upcoming control activities (having the data element TRANSIT OPERATION-Notification type = ‘0-Decision to Control (and requested documents if needed)’). This message is sent in both cases of Normal and Simplified Procedures. The state of the movement at the Office of Departure is set to [Under control](#_Office_of_Departure).   * The following scenario **III.II.2.9.1 T-TRA-DEP-A-010-Control by Office of Departure with release for transit refused** will be updated as follows:   **[Step 6]** The Office of Departure sends the ‘Control Decision Notification’ E\_CTR\_DEC (IE060) message to the Holder of the Transit Procedure to notify about the upcoming control activities (having the data element TRANSIT OPERATION-Notification type = ‘0-Decision to Control (and requested documents if needed)’). The state of the movement at the Office of Departure is set to [Under control](#_Office_of_Departure).   * The following paragraph of the section **III.II.2.10 Invalidation of Transit Declaration** will be updated as follows:   An already accepted transit declaration (i.e. after status [Accepted](#_Office_of_Departure)) can be invalidated by the Holder of the Transit Procedure via the ‘Declaration Invalidation Request’ E\_DEC\_INV (IE014) message, but only before release for transit (i.e. before status [Movement released](#_Office_of_Departure)). Upon reception of the ‘Declaration Invalidation Request’ E\_DEC\_INV (IE014) message, the Office of Departure examines the request and informs the Holder of the Transit Procedure accordingly of the result of such request via the ‘Invalidation Decision’ E\_INV\_DEC (IE009) message (i.e. positive or negative). However, where the Office of Departure has informed the Holder of the Transit Procedure of its intention to examine the goods with the ‘Control decision notification’ E\_CTR\_DEC (IE060) message (having the data element TRANSIT OPERATION-Notification type = ‘0-Decision to Control (and requested documents if needed)’), a request for invalidation of the customs declaration will be automatically rejected at status [Under control](#_Invalidation_at_Office).   * The following paragraph of the section **III.V.1.1 Office of Departure (until movement release)** will be updated as follows:   When the movement status is “Accepted”, the Office of Departure can then proceed as follows:   * The Office of Departure receives a valid or invalid (Syntax or R/Cs) ‘Declaration Amendment’ E\_DEC\_AMD (IE013) message from the Holder of the Transit Procedure. The status of the movement remains ‘Accepted’; * A decision for control means that the ‘Control Decision Notification’ E\_CTR\_DEC (IE060) message (having the data element TRANSIT OPERATION-Notification type = ‘0-Decision to Control (and requested documents if needed)’) is sent to the Holder of the Transit Procedure, and the status will be set to “Under control”. * A decision for no control on goods and/or documents means that the declared guarantees (maintained in GMS) are prepared for guarantee registration by sending the ‘Guarantee Use’ C\_GUA\_USE (IE203) to the responsible Office of Guarantee. In that case, the state of the Transit Operation is set to “Guarantee under registration”.   The above changes for Figure 122 will also be transposed into the **Appendix N**.  **IMPACT ASSESSMENT**  **Potential impact on External Domain (only).**  This RFC-Proposal is considered as a ***likely* documentary improvement** of the DDNTA-5.14.1-v1.00 (Main Document) and assumed to have no implementation impact for the NAs. The Functional Specifications (FSS/BPM) also need to be aligned to this clarification.  This RFC-Proposal may require a correction of the NTA(NCTS-P5). It is considered that the change proposed has no impact on business continuity and no impact on the Common Domain. Consequently, it can be deployed in a **flexible way**.  **Proposed** date of applicability in Operations (T-Ops): As soon as possible, at latest 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 P4-P5**: None  **Consequence of not approving the RFC-Proposal**: Possible confusion for Business Analysts / AEOs / National Helpdesk. The decision to control is not communicated properly.  **Risk of not implementing the change**: Medium.  Impacted IEs:   * None   Impacted CI Artefacts:  - **Functional Specifications (FSS/BPM)-v5.30: Yes;**  **- DDNTA-5.14.1-v1.00 (Main Document): Yes;**  **- DDNTA-5.14.1-v1.00 (Appendix N): Yes;**  - UCC IA/DA Annex B: No;  - DDCOM-20.3.0-v1.00: No;  - DDNTA-5.14.1-v1.00 (Appendix Q2\_R\_C, PDFs): No;  - CSE-v51.6.0: No;  - DMP Package-5.6.0 SfA-v1.00: No (incl. update of file Rules and Conditions\_v0.43): No;  - CTS-5.6.1-v1.00: No;  - ACS-v5.5.0 & ACS-Annex-NCTS: 5.5.0: No;  - NCTS\_CTP-5.7.0-v1.00: No;  - NCTS\_TRP-5.7.5: No;  - ieCA 1.0.1.0: No;  - CRP-5.5.0-v1.00: 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**

|  |  |  |
| --- | --- | --- |
| **DDNTA-5.14.1-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Main Document: As described in Section 3 - Proposed Solution**  **Appendix N (sheet TRA-OoDep): will be extended to also mention the messages IE060** | |
| **Functional Specifications (FSS/BPM)-v5.30** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **The sending of the message IE060 under the ‘pre-lodged’ status and the textual descriptions as presented in the Section 3 above will be also transposed to the text of the *FSS-UCC NCTS Section I-BUSINESS PROCESS THREADS FOR CORE BUSINESS* and to the State Transition Diagram of the BPM.** | |

**Estimated impact on National Project**

|  |  |
| --- | --- |
| CosmeticLow  Medium  High  Very High  Short description   |  | | --- | | Maybe a clarification of the External Domain, with an update of the translated DDNTA Main Document?  **Maybe an impact on the state engine rules of the Office of Departure (sending of IE060) when the status is "pre-lodged"?** | |

|  |  |  |  |
| --- | --- | --- | --- |
| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by CUSTDEV3 | 24/11/2021 |  |
| v0.11 | SfR to NPMs | 26/11/2021 |  |
| v0.12 | SfR to NPMs | 01/12/2021 | *Deleting the duplicate paragraph , as per NA-DE comment.* |
| v1.00 | SfA to NPMs | 25/02/2022 | *SfA to NPM* |