# Impact Analysis Report/ RFC-Proposal

**Section 1: Meta-data**

|  |  |
| --- | --- |
| **RFC ID** | **RFC\_NCTS\_0123** (RTC-59272) |
| **Related Incident ID** | - |
| **RFC Initiator / Organization** | TAXUD/B3, RTE |
| **CI** | **NCTS-P5 (DDNTA-v5.14.1 – CSE-v51.6.0)** |
| **Type of Change** | **Standard** **Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | | Enable transitional updates to handle special cases when proper TIN values are not provided in legacy IEs. | |
| **RFC Source** | |  |  | | --- | --- | | **Legal & Policy Change**  **Organisational Changes** | **Business Change**  **IT Change** | |
| **Review by Business User recommended?** | **Yes No** |

***Change Summary***

|  |
| --- |
| **NCTS-P5 (DDNTA-v5.14.1 - CSE-v51.6.0): Relax TIN pattern on CARRIER in CD IEs** |

|  |
| --- |
| One of the main conclusions of the ieCA Real Time Exercise is the need to relax the XSD used for the TIN validation in NCTS-P4 common domain messages during the Transitional Period.  This affects the NCTS-P5 traders in common domain messages, and more specifically the CARRIER trader, which “Identification number” needs to be relaxed as well, i.e. to relax the existing pattern. |

**Section 2: Problem statement**

|  |
| --- |
| TIN-related issues represented the majority of the rejections during that RTE exercise.  In NCTS-P4/ECS-P2, Appendices X (XSD) it is specified that the TIN length is maximum 17 characters, minimum 3 characters and start with A-Z in the first two positions.    During the exercise some NAs sent messages aligned to Appendix Q2 but not to Appendix X (XSDs). At the same time, some NAs sent messages aligned to Appendix Q2 and to Appendix X (XSDs).  ieCA translated each EDIFACT NCTS-P4/ECS-P2 message into an XML NCTS-P4/ECS-P2 message and then validated this XML message against the (legacy) XSD. If the TIN was less than 3 characters or did not start with A-Z in the first two positions, ieCA rejected the message as per Appendix X (XSDs).  TIN-related rejections were not observed in Operations, because the NCAs are not validating the EDIFACT messages against the NCTS-P4/ECS-P2 XSD.  A partial workaround was applied in ieCA during the exercise, to reduce the rejections. The pattern for some TIN that can be non-EORI TIN (i.e. no more required to start with two letters (A-Z)) was removed, keeping the constraint on the minimum length of 3 characters (to enforce a minimum level of data quality). This workaround of relaxing the legacy XSDs by removing the 2-letters beginning restriction significantly reduced the number of rejections, but more relaxed XSDs are required to eliminate all rejections.  Therefore, it was decided that the DDNxA legacy phase XSDs are further adapted to remove the extra constraint and the pattern will be simplified, keeping only the alphanumeric with 17 maximum characters requirement. This way, rejections in CD will be avoided. The constraints must remain for the External Domain.  Please refer also to RFC\_DDCOM\_0017, in which the transitional relaxed pattern is depicted.  NAs should ensure that the XSD pattern defined in NCTS-P4 for TIN as a recommendation is adopted for the External Domain messages (while it is not enforced as mandatory), as well as to improve the quality of the data (including the TIN of Safety & Security related actors). This can be achieved by enforcing the XSD constraints pattern in External Domain or by applying extra rules on the EDIFACT messages that they are receiving from the traders to be equivalent to the XSDs (reject declarations from traders that include invalid TIN). The objective of the recommended approach is to smooth the transition and to avoid potential problems at the borders or at offices of destination, with extra work for Customs Officers in all Europe.  Based on all above, the forthcoming release of NCTS-P5 DDNTA needs to be adopted in order to avoid rejections on the common domain messages after the upgrade conversion.  The affected trader that has the TINNewType applied on the “Identification number” is the <CARRIER>.      Therefore, **the above pattern that is applied in <CONSIGNMENT-CARRIER.Identification number> needs to be relaxed**, in order to facilitate the conversion process with the legacy <CARRIER (TRADER)> that would have the relaxed pattern.  ~~Consequently,~~ **~~the guideline G0002~~****~~will be also removed~~** ~~from <CONSIGNMENT-CARRIER.Identification number>, since it is applied only in those data items that have a specific pattern.~~ |

**Section 3: Description of proposed solution**

|  |
| --- |
| The next release of **DDNTA** shall be updated as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~ ):   1. **NCTS-P5 DDNTA Appendix X**   Based on the aforementioned analysis, in order to avoid the rejection of messages in the upgrade of NCTS-P4 <Carrier (Trader)>, the pattern of NCTS-P5 <CONSIGNMENT-CARRIER.Identification number> shall be relaxed.  In this way, the complex type of <CONSIGNMENT-CARRIER> should be:  **File: ctypes.xsd**  <xs:complexType name="CarrierType">  <xs:annotation>  <xs:documentation>  <usedBy>Used by 5/91 messages: CD001C, CD003C, CD038C, CD050C, CD115C</usedBy>  </xs:documentation>  </xs:annotation>  <xs:sequence>  <xs:element name="identificationNumber" type="IdentificationNumberContentType01">  <xs:annotation>  <xs:documentation>  <description value="Identification number" />  <format value="an..17" />  <optionality value="R" />  <xsdBaseType value="TINTypeRelaxed" />  </xs:documentation>  </xs:annotation>  </xs:element>  </xs:sequence>  </xs:complexType>  The above update concerns the Common Domain messages: CD001C, CD003C, CD038C, CD050C and CD115C.   1. **NCTS-P5 DMP**   The next release of **NCTS-P5 DMP** will also be updated as following:  **Resolution for upgrade (for <CONSIGNMENT-CARRIER.Identification number>)**  No issue for Upgrade. DG CARRIER contains only DI Identification number therefore unless NCTS P4 (CARRIER) TRADER - TIN is provided DG will not be created. ~~For the transitional period, no pattern should be defined for <CONSIGNMENT-CARRIER.Identification number> in order to allow values from NCTS-P4.~~ For the transitional period, a relaxed pattern should be defined for <CONSIGNMENT-CARRIER.Identification number> to match values from NCTS-P4.  **IMPACT ASSESSMENT:**  This RFC-Proposal concerns changes at syntactic level in Common Domain messages.  It is considered that the change proposed via the current RFC-Proposal has impact on business continuity and therefore shall be deployed in a **Big Bang approach**. More specifically:  **Changes at semantic level**  Ν/Α  **Changes at syntactic level**  This IAR concerns changes at syntactic level, as it describes the update of the existing pattern for complex type “CarrierType”, in order to accept TIN that do not conform to the EORI structure. That practically means that:   * If the sender is aligned with the proposed changes, and the recipient is not, then a syntactic rejection will occur, as the recipient expects only EORI-like values for the “Identification number” of “Carrier”. * If the sender is not aligned with the proposed changes and the recipient is, then no syntactic rejection shall be caused, since the recipient is more relaxed.   **Movement initiated under the previous DDNTA (5.14.1) release which continues its flow under the new DDNTA (5.15.0) release (open movement):** No issues are expected to occur in open movement case.  **Risk of not implementing the change**: In case of not implementing this change, a syntactic rejection may occur, as the recipient expects only EORI-like values for the “Identification number” of “Carrier”.  **Proposed** date of applicability in Operations (**T-Ops**):   1.12.2022  **Proposed** date of applicability in CT (**T-CT**):                     July 2022  **Expected** date of approval by ECCG (**T-CAB**):                  January 2022  **Impact on transition**: Yes  **Risk of not implementing the change:** Yes  **Impacted R/C/G/T/TRT/BRT:** N/A  **Impacted IEs**: CD001C, CD003C, CD038C, CD050C, CD115C    **Impacted CIs**:   * **DDNTA-5.14.1-v1.00 (Appendix X): Yes;** * **DMP Package-5.6.0-v1.00 (incl. update of file Rules and Conditions\_v0.43): Yes;** * **TRP-5.7.5-v1.00 : Yes;** * **CRP-5.5.0-v1.00 : Yes;** * **CTS-5.6.2-v1.00: Yes;** * CSE-v51.6.0: No; * CTP-5.7.0-v1.00: No; * ACS: 5.4.0-v1.00 & ACS-Annex-AES/NCTS: 5.5.0-v1.00: No; * AES-P1 and NCTS-P5 Long-Lived “Legacy” (L3) Movements Study v1.40: No; * DDCOM 20.3.0-v1.00: No; * ieCA 1.0.2.1: No * CS/RD2: No; * CS/MIS2: No; |

**Impact on CI artefacts**

|  |  |  |
| --- | --- | --- |
| **DDNTA 5.14.1-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Update of Appendix x (ctypes.xsd) as defined in section 3. | |
| **DMP Package 5.6.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | NCTS- Data Mapping- v0.43 file on conversion resolution fields. | |
| **TRP 5.7.5-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | |  | |
| **CRP 5.5.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | |  | |

**Estimated impact on National Project**

|  |  |  |
| --- | --- | --- |
|  | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | |  | |

|  |  |  |  |
| --- | --- | --- | --- |
| **Document History** | | |  |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by CUSTDEV | 14/12/2021 | *Draft by CUSTDEV* |
| v0.11 | Updates by CUSTDEV | 15/12/2021 | *Version Update* |
| v1.00 | SfA to NPMs | 01/02/2022 | *SfA to NPMs, Updates in blue based on APO* |