# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0212** (JIRA:UCCNCTS-2961) |
| **Related Incident ID** | **IM537122 / PM24831 / KE22777**  ***RFC\_AES\_0136\_SDEV-RFC-IAR-UCCAES1678*** |
| **RFC Initiator / Organization** | **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***

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| **NCTS-P5 (DDNTA-5.15.0-v1.0.0 - CSE-v51.8.0): Description of rule R0364 shall be corrected and new rules and transition rules added, to properly manage the situation of goods packed together, during and after the Transitional Period.** |
| The R0364 shall be optimized to better specify when the kind of packages that can be used when grouping goods items. New rules shall be added to better control the grouping, to avoid partial grouping. |

**Section 2: Problem statement**

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| Following multiple discussions, also documented in PICS FORUM:  See [***Gross mass ='0' & Nr of packages > '0' !?! About R0221 (AES vs. NCTS-P5), R0222 (AES only), R0364 ...***](https://webgate.ec.europa.eu/pics/group/20581/forum/40256)  Extract from PICS:  (…)  Is the following understanding correct?  “As soon as one PACKAGING occurrence inside a CONSIGNMENT ITEM has a numberOfPackages equal to ‘0’, gross mass shall be ‘0’.  And thus, the rest of the PACKAGING occurrences inside of this CONSIGNMENT ITEM must have a numberOfPackages equal to ‘0’. “  +++++++++++++++++++++++++  (…) the R0221 could be read as:  IF ***at least one*** /\*/Consignment/HouseConsignment/ConsignmentItem/Packaging/numberOfPackages is EQUAL to ‘0’  THEN for ***THIS*** CONSIGNMENT ITEM /\*/Consignment/HouseConsignment/ConsignmentItem/Commodity/GoodsMeasure/grossMass is EQUAL to ‘0’  AND for THIS HOUSE CONSIGNMENT at least one other CONSIGNMENT ITEM must exist with  /\*/Consignment/HouseConsignment/ConsignmentItem/Commodity/GoodsMeasure/grossMass having a value different from ‘0’  ELSE for ***THIS*** CONSIGNMENT ITEM  /\*/Consignment/HouseConsignment/ConsignmentItem/Commodity/GoodsMeasure/grossMass must be different from ‘0’.  At this stage, we consider that this way to read / understand the rule is rather standard and applied like that in DROOLS.  Let’s consider some examples:  ***Example 1:***  102 kg = gross mass of (all packages of Goods Item #1 + all packages of Goods Item #2)  HOUSE CONSIGNMENT #1  **GOODS ITEM #1**  Gross mass = 102  Net mass = 50  PACKAGING  Sequence number = 1  Type of package = 4H  Number of packages = 10  Shipping marks = 1-1-Mark1  Sequence number = 2  Type of package = 2C  Number of packages = 20  Shipping marks = 1-1-Mark2    **GOODS ITEM #2**  Gross mass = 0  Net mass = 50  PACKAGING  Sequence number = 1  Type of package = 3A  Number of packages = 0  Shipping marks = 1-1-Mark2    >>>>>>> The two goods items are packed together, fully.    Example 2:  102 kg = gross mass of (all packages of Goods Item #1 + the packages of Goods Item #2 with the mark “1-1-Mark2” [possibly another type of package])  HOUSE CONSIGNMENT #1  **GOODS ITEM #1**  Gross mass = 102  Net mass = 50  PACKAGING  Sequence number = 1  Type of package = 4H  Number of packages = 10  Shipping marks = 1-1-Mark1  Sequence number = 2  Type of package = 2C  Number of packages = 20  Shipping marks = 1-1-Mark2    **GOODS ITEM #2**  Gross mass = 0  Net mass = 50  PACKAGING  Sequence number = 2  Type of package = 3A  Number of packages = 1000  Shipping marks = 1-1-Mark9  Sequence number = 1  Type of package = 5L  Number of packages = 0  Shipping marks = 1-1-Mark2  >>>>>>> Two goods items are packed together, **partially**.  +++++++++++++++++++++++++++  *Thu, 20/10/2022 - 08:52*  *Hello,*  *here a quick response to your examples:*  ***Example 1:***  *Seems to be okay in my opinion, the goods of Goods Item #2 are packed into the packages with the Shipping mark "1-1-Mark2" from Goods Item #1. No problem...*    ***Example 2:***  *A little bit more complex and difficult, but (in my opinion) not okay...*  *The* ***Goods Item #1*** *is still okay, one kind of cargo packed in two different types of packages which are both described.*  *The* ***Goods Item #2*** *is now a mixture of a "normal" goods item with own packages and masses (= Seq. number 2: 1000 packages of type 3A with shipping marks "1-1-Mark9") and a second part (= Seq. number 1) with no package and a shipping mark which is leading to Goods Item #1, Seq. number = 2.*    *In my understanding this* ***second Goods Item has to be split up into two different goods items****:*  *- Goods Item #2:*  *Sequence number = 1*  *Type of package = 3A*  *Number of packages = 1000*  *Shipping marks = 1-1-Mark9*    *- Goods Item #3 (new):*  *Sequence number = 1*  *Type of package = 5L*  *Number of packages = 0*  *Shipping marks = 1-1-Mark2*    *If this split-up of Goods Item #2 is done (even if it is the same kind of cargo in these two goods items), it is easier to understand where these two items can be found in case of control...*  **R0364** should be clarified to avoid that goods are partially packed together (as illustrated above).  This correction also aims to implement a logic similar to AES. |

**Section 3: Description of proposed solution**

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| The **DDNTA-5.15.0-v1.00 and the CSE-v51.8.0** shall be corrected as illustrated below (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~):  In the messages CC013C, CC015C, CC029C **and CC043C**, the rules R0220 and R0219 will be added.  In the messages **CC013C, CC015C,** CD001C, CD003C, CD012C, CD038C, CD050C, CD115C, CD160C, CD165C the two rules and the BRTs will be also added as illustrated below:  Extract from **CD001C** for illustration:  (…)  ---------CONSIGNMENT ITEM 999x R  ------------COMMODITY 1x R  ---------------COMMODITY CODE 1x D B1834, C0153  ---------------DANGEROUS GOODS 99x O E1406, G0300  ---------------GOODS MEASURE 1x O B2101  *Gross mass O n..16,6 B1860, B2101, E1109, G0021, R0221*  *Net mass D n..16,6 B1805, B1862, C0837, E1109, R0223*  ------------PACKAGING 99x R  *Sequence number R n..5 R0987*  *Type of packages R an2 CL017* R0220, B1919  *Number of packages D n..8 C0060, E1111, G0021, R0364,* R0219, B1819, B1964  *Shipping marks D an..512 C0060, E1105, G0024*  ------------PREVIOUS DOCUMENT 99x D B1000, C0035, E1401, G0825  (…)  R0364 is modified as follows:  **Technical Description:**  IF /\*/Consignment/HouseConsignment/ConsignmentItem/Packaging/numberOfPackages is EQUAL to  ‘0’ (zero)  THEN for THIS HOUSE CONSIGNMENT at least one other CONSIGNMENT ITEM must exist with  (the same /\*/Consignment/HouseConsignment/ConsignmentItem/Packaging/shippingMarks AND /\*/Consignment/HouseConsignment/ConsignmentItem/Packaging/numberOfPackages having a value GREATER than ‘0’ (zero) AND /\*/Consignment/HouseConsignment/ConsignmentItem/Packaging/typeOfPackages having a value NOT IN SET {CL181, CL182}).  **Functional Description:**  IF <CONSIGNMENT-**HOUSE CONSIGNMENT**-CONSIGNMENT ITEM-PACKAGING.Number of  Packages> is EQUAL to ‘0’ (zero)  THEN for **THIS** HOUSE CONSIGNMENT at least one other CONSIGNMENT ITEM must exist with  (the **same** <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PACKAGING.Shipping  marks> AND  <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PACKAGING.Number of packages> having a value GREATER than ‘0’ (zero) AND  <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PACKAGING.Type of packages> having a value **NOT IN SET {CL181(KindOfPackagesBulk), CL182(KindOfPackagesUnpacked)**}).  B1964 is added:  **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN R0364 attached to  /\*/Consignment/HouseConsignment/ConsignmentItem/Packaging/numberOfPackages  shall be disabled  **Functional Description:**  N/A  **🡪 Appendix K:**  *B1964 in Common Domain messages*  Validated by Sender: R Validated by Recipient: R  *B1964 in External Domain messages*  Validated by Sender: - Validated by Recipient: -  **Note:** If the Recipient is validating the rule R0364, then it must also apply the B1964.  R0219 is added:  **Technical Description:**  IF /\*/Consignment/HouseConsignment/ConsignmentItem/Packaging/numberOfPackages is EQUAL to '0' (zero)  THEN no further data group /\*/Consignment/HouseConsignment/ConsignmentItem/Packaging with a value not equal to "0" (zero) in the data item /\*/Consignment/HouseConsignment/ConsignmentItem/Packaging /numberOfPackages is specified for this data group /\*/ HouseConsignment/ConsignmentItem.  **Functional Description:**  IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PACKAGING.Number of packages> is EQUAL to '0' (zero)  THEN no further data group <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PACKAGING> with a value not equal to "0" (zero) in the data item <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PACKAGING.Number of packages> is specified for this data group ~~<GOODS SHIPMENT-GOODS ITEM>~~ **<CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM>**.  **Note:** the Rule R0219 can also be understood - without the double negation – as follows:  IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PACKAGING.Number of packages> is EQUAL to '0' (zero)  THEN in this <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM> any other occurrence of <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PACKAGING.Number of packages> shall be EQUAL to "0" (zero).  **🡪 Appendix K:**  *R0219 in Common Domain messages*  Validated by Sender: R Validated by Recipient: SR  *R0219 in External Domain messages*  Validated by Sender: - Validated by Recipient: -  B1819 is added  Technical Description:  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN R0219 attached to  /\*/Consignment/HouseConsignment/ConsignmentItem/Packaging/numberOfPackages  shall be disabled  Functional Description:  N/A  **🡪 Appendix K:**  *B1819 in Common Domain messages*  Validated by Sender: R Validated by Recipient: R  *B1819 in External Domain messages*  Validated by Sender: - Validated by Recipient: -  **Note:** If the Recipient is validating the rule R0219, then it must also apply the B1819.  R0220 is added:  **Technical Description:**  IF /\*/Consignment/HouseConsignment/ConsignmentItem/Packaging/numberOfPackages is EQUAL to '0' (zero)  THEN /\*/Consignment/HouseConsignment/ConsignmentItem/Packaging/typeOfPackages shall not be in SET CL182 for this data group /\*/ Consignment/HouseConsignment/ConsignmentItem.  **Functional Description:**  IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PACKAGING.Number of packages> is EQUAL to '0' (zero)  THEN <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PACKAGING.Type of packages> shall not be in SET CL182 (KindOfPackagesUnpacked) for this data group <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM>.  **🡪 Appendix K:**  *R0220 in Common Domain messages*  Validated by Sender: R Validated by Recipient: SR  *R0220 in External Domain messages*  Validated by Sender: - Validated by Recipient: -  B1919 is added:  **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN R0220 attached to /\*/Consignment/HouseConsignment/ConsignmentItem/Packaging/typeOfPackages shall be disabled  **Functional Description:**  N/A  **🡪 Appendix K:**  *B1919 in Common Domain messages*  Validated by Sender: R Validated by Recipient: R  *B1919 in External Domain messages*  Validated by Sender: - Validated by Recipient: -  **Note:** If the Recipient is validating the rule R0220, then it must also apply the B1919.  The **same** correction shall also be applied in **NCTS-P6 for DDNTA-6.2.0**.  **IMPACT ASSESSMENT:**  This RFC-Proposal concerns documentary changes in both Common and External Domain messages. It is considered that the change proposed via the current RFC-Proposal has no impact on business continuity and therefore shall be deployed in a **flexible way**.    **Proposed** date of applicability in Operations (**T-Ops**):   As soon as possible, **before 01.12.2023** (but recommended before entering in NCTS-P5 operations in Common Domain)  **Proposed** date of applicability in CT (**T-CT**):                     01.03.2023 (to be confirmed)  **Expected** date of approval by ECCG (**T-CAB**):                  31.01.2023  **Risk of not implementing the change:**  After the Transitional Period, there will be declarations with confusion in case of goods packed together. Moreover, rejections of CD001C, CD003C, CD038C, CD050C, CD115C, CD165C will possibly be observed, if the type of packages is unpacked or if goods items are partially packed together.  **Impacted messages:**   * CC013C, CC015C, ~~CC017C,~~ CC025C, CC029C, **CC043C,** ~~CC044C~~ and * CD001C, CD003C, CD012C, ~~CD018C,~~ CD038C, CD050C, CD115C, CD160C, CD165C.   **Impacted Rules/Conditions, Guidelines:**   * **R0219, B1819, R0220, B1919, R0364, B1964**   **Impacted CI Artefacts:**   * DDNTA-5.15.0-v1.00 (Main Document): No. * **DDNTA-5.15.0-v1.00 (Appendix ‘Q2\_R\_C’, ‘Q2’, ‘K’): Yes.** * **CSE-v51.8.0: Yes.** * Functional Specifications NCTS-P5 (FSS/BPM): 5.30.2: No. * DDCOM-20.4.0-v1.00: No. * **DMP Package-5.7.0-v1.00 (CD3-NCTS-P5 and AES\_DMP-5.7.0-v1.00-SfA\_(Rules and Conditions\_v0.45)\_SfA.xlsx): Yes.** * **CTS-5.7.2-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-5.12.0: 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:**   * **DDNTA-6.2.0-v1.00 (Appendix ‘Q2\_R\_C’, ‘Q2’, ‘K’): Yes.** * Functional Specifications NCTS-P6 (FSS/BPM): No. |

**Impact on CI artefacts**

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| **DDNTA-5.15.0-v1.00 (Appendices)** | Cosmetic  Low  Medium  High  Very High   |  | | --- | | Appendices generated by CSE + Appendix Q2, Q2\_R\_C, K shall be updated as defined in section 3. | |
| **DDNTA-6.2.0-v1.00 (Appendices)** | Cosmetic  Low  Medium  High  Very High   |  | | --- | | Appendices generated by CSE + Appendix Q2, Q2\_R\_C, K shall be updated as defined in section 3. | |
| **CSE-v51.8.0** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | As described in section 3. | |
| **DMP-v5.7.0 v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | New R&C as described in section 3. | |
| **TRP-5.12.0** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | New optional FE scenarios will be defined (TFE-T-B1964, TFE-R0219, TFE-T-B1819, TFE-R0220, TFE-T-B1919). | |

**Estimated impact on National Project**

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| Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | To be further assessed by each National Project Team. | |

| **Document History** | | | |
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| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFTDEV | 14/11/2022 | *Draft by SOFTDEV* |
| v0.20 | Draft by SOFTDEV | 22/11/2022 | *PM&KE ID added* |
| v0.30 | SfR to NPMs | 10/01/2023 | Major update by DG TAXUD, becoming consistent with ***RFC\_AES\_0136.*** |
| v1.00 | SfA to NPMs | 30/01/2023 | *On page 5 typo corrected in R0219, as per NA-DE comment. Implementing comment received from NA-IE (IM567576) for page 7.*  *Both made highly visible ~~text removed~~ – text added, compared to v1.10.*  Notes and explanations - as suggested by NA-ES - also added in green.  ***Considered as accepted following absence of any other comments from NPMs by 21.01.2023.*** |
| *v1.10* | *SfA to NPMs with implementation details.* | *10/03/2023* | **Implemented in DDNTA-5.15.1-v.00 with required extra corrections highlighted.** *The BRTs B1819, B1919, B1964 were added to the CC013C and CC015C messages and rules R0220 and R0219 added to the CC043C message.* |