# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0214** (JIRA: UCCNCTS-3420) |
| **Related Incident ID** | **IM576923 / PM25288 / KE23187** |
| **RFC Initiator / Organization** | **NA-DE / NA-ES** |
| **CI** | **NCTS-P5 (DDNTA-5.15.0-v1.00 – 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-v1.00 - CSE-v51.8.0): Correction of B1836 – No Office of Transit required to move EU goods with T2F (Fiscal territories).** |
| Fixing the B1836 [that disables the C0030 during TP] to avoid rejection when moving EU Goods to Fiscal Territories in case of a mix of T1 and T2F declaration types (both Technical and Functional Descriptions shall be fixed). |

**Section 2: Problem statement**

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| Problem detected during the first days of NCTS-P5 operations between DE and ES, related to B1836.  Starting point is a transit declaration type “T” on Transit Operation Level and two Goods Items, the first one with declaration type “T1” and the second Goods Item with “T2F”.  The condition C0030 itself (applicable in the Post-Transitional period) does NOT request the existence of an Office of Transit (only if type of declaration is “T2”).  But B1836 (that disables C0030 during TP) requests the existence of an OoTra if type of declaration on Transit Operation Level is in set {T2, T}.  Considering that a declaration type ‘T2F’ is ONLY possible if the office of destination is located in an EU member state AND in an area where the VAT directive is not applied, examples are ES (with Canary Islands), FI (with Aland Islands) and GR (Mount Athos).  For a transit movement into these three EU member states a “mixed declaration” consisting of T1 and T2F is possible, but not T2 (unless crossing a CTC Contracting Party).  An for such a transit movement DE -> ES an OoTra is NOT needed (from our point of view, routing of consignment DE – BE – FR - ES).  The option to **disable** urgently and permanently the verification of B1836 was considered as not optimum because:   * It would require to also disable the C0030 (to avoid other rejections for CD001C created by UPGRADE from CD001B, legacy messages CD001B , based on C0030), * It could impact the quality of the declarations lodged by traders (if some NAs are using the same B1836 for Common Domain messages and for External Domain messages).   In this context, to enforce the business continuity, the solution recommended by DE, ES and SI (the 3 countries in operating as P5 countries on 24.02.2023) and DG TAXUD is to provide a minor but permanent correction.  The same correction would be required on the DDNTA of NCTS-P6, to ensure consistency. |

**Section 3: Description of proposed solution**

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| The **DDNTA-5.15.0-v1.00 (incl. Appendix Q2)** and the **CSE-v51.8.0** shall be corrected as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~):  The wording of existing **B1836** shall become:  **Technical Description:**  **IF** <Decisive Date> is LESS than or EQUAL to <TPendDate>  **THEN** C0030 shall be disabled AND  **IF** /\*/TransitOperation/declarationType is EQUAL to ‘TIR’,  **THEN** /\*/CustomsOfficeOfTransitDeclared = "N"  **ELSE**  **IF** the first two characters of /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL112  **OR**   the first two characters of /\*/CustomsOfficeOfDestinationDeclared/referenceNumber is in SET CL112  **OR**  /\*/TransitOperation/declarationType is ~~in SET {T2, T}~~ **EQUAL to ‘T2’**  **OR**  (/\*/TransitOperation/declarationType is EQUAL to 'T' AND at least one instance of  /\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is EQUAL to 'T2')  **THEN** /\*/CustomsOfficeOfTransitDeclared = "R"  **ELSE** /\*/CustomsOfficeOfTransitDeclared = “O”.  **Functional Description:**  N/A    **IMPACT ASSESSMENT:**  This RFC-Proposal is mandatory to ensure business continuity.  It describes a small but important correction and it must be deployed   * AS URGENTLY AS POSSIBLE in all countries operating already NCTS-P5, * AS URGENTLY AS POSSIBLE in the ieCA application (update of DROOLS in CRP), * BEFORE starting NCTS-P5 operations for all the other NAs.     **Proposed** date of applicability in Operations (**T-Ops**):   At latest by 01.03.2023.  **Proposed** date of applicability in CT (**T-CT**):                     20 April 2023  **Expected** date of approval by ECCG (**T-CAB**):                  N/A – Emergency change.  **Risk in case of non-implementation:**   * All EU transit movements to the special fiscal territories will be blocked. Extra workload for the National Helpdesks.   **Impacted Messages:**   * Only the Common Domain messages: CD001C, CD003C, CD038C, CD115C.     **Impacted Rules, Conditions & BRTs etc.:**   * B1836     **Impacted CI Artefacts:**   * **CSE-v51.8.0: Yes.** * **DDNTA-5.15.0-v1.00 (ONLY Appendix Q2 &** **Appendix 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-v5.7.0-v1.00: Yes.** * CTS-5.7.5-v1.00: Yes. **tbc** * 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-5.12.3: Yes.** * **CRP-5.7.7.1-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 :**   * **CSE-v60.4.0: Yes.** * **DDNTA-6.2.0-v1.00 (Appendix Q2\_R\_C, Q2 PDFs): Yes.** * DDNTA-6.2.0-v1.00 (Main Document): No. * DDCOM-21-3.0-v1.00: No. * Functional Specifications NCTS-P6 (FSS/BPM): 7.10.0: No. |

**Impact on CI artefacts**

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| **DDNTA-5.15.0-v1.00 (Appendices)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **See section 3. The Appendix Q2 (PDF) is generated by SpecsManager. Manual update of Appendix ‘Q2\_R\_C’ for the corrected B1836.** | |
| **CSE-v51.8.0** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **The typos in B1836 shall be corrected, as per section 3.** | |
| **DMP-5.7.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Manual update of file ‘Rules and Conditions\_v0.45’ for the condition B1836, as defined in section 3 above.** | |

**Estimated impact on National Project**

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| Cosmetic Low  Medium  High  Very High  Short description   |  | | --- | | Correction of the rules, correction of test data, correction of documentation of Common Domain (no impact on Traders). | |

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| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft - SfI to DE, ES, SI | 24/02/2023 | *Circulated for quick review by SOFT-DEV* |
| v0.11 | Draft - SfI to DE, ES, SI | 26/02/2023 | *Circulated for quick review by NAs in operations* |
| v1.00 | SfA – Accepted NAs in PROD | 01/03/2023 | *Accepted by NPMs of NAs in operations - Applied immediately by DE\_ES\_SI*  *Applied in CRP/ieCA on 02.03.2023.* |
| ***ALSO IMPLEMENTED IN DDNTA-5.15.1-v1.00***  ***(together with the rest of RFC-List.37)*** | | | |