# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0144** (RTC- 51890) |
| **Related Incident ID** | IM425831,  IM437998 |
| **RFC Initiator / Organization** | NA-BE, TAXUD/B3, CD3 |
| **CI** | NCTS**-P5 (DDNTA-v5.14.1 – CSE-v51.6.0)** |
| **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-v5.14.1 CSE-v51.6.0): The CL076 shall be replaced by the Codelist CL286 in messages CD200C, CD201C, CD203C, CD204C and CD205C.** |
| The Data Items <GUARANTEE.GUARANTEE REFERENCE.GRN> and <GUARANTEE.GUARANTEE REFERENCE.Access code> are always Required in messages CD200C, CD201C, CD203C, CD204C and CD205C, based on the fact that only Guarantees with GRN are communicated to the GMS.  As a result, the codelist- CL076 currently applicable on the Data Item <GUARANTEE.Guarantee type> in messages CD200C, CD201C, CD203C, CD204C and CD205C, will be replaced by CL286 to allow only the values where the GRN is required. |

**Section 2: Problem statement**

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| In the latest version of the CSE deliverable (NCTS-P5 DDNTA-v5.14.1 based on CSE-v51.6.0), the codelist **CL251- GuaranteeType**, is assigned on <GUARANTEE.Guarantee type> in messages **CC013C, CC015C and CC029C**.  In addition, the Condition **C0085** is assigned on the Data Group <GUARANTEE. GUARANTEE REFERENCE> in the same messages.  Part of **CC015C** message:  …  …  ---GUARANTEE 9x R  ------GUARANTEE REFERENCE 99x D **C0085**  …  ---GUARANTEE  Sequence number R n..5 R0987  Guarantee type R an1 **CL251** R0900  Other guarantee reference D an..35 C0130  ------GUARANTEE REFERENCE  Sequence number R n..5 R0987  GRN D an..24 **C0086** G0002 R0318  Access code D an..4 C0086 E1118  Amount to be covered O n..16,2 B2101 R0021  Currency O a3 CL048 B1898 B2101  …  …  ***Note:*** *The structure is the same for messages IE013 and IE029.*  The values of **CL251- GuaranteeType** are presented in the following table:   |  |  |  |  | | --- | --- | --- | --- | | name | codelistNumber | dataItem | description | | GuaranteeType | CL251 | 0 | Guarantee waiver | | GuaranteeType | CL251 | 1 | Comprehensive guarantee | | GuaranteeType | CL251 | 2 | Individual guarantee in the form of an undertaking by a guarantor | | GuaranteeType | CL251 | 3 | Individual guarantee in cash or other means of payment recognised by the customs authorities as being equivalent to a cash deposit, made in euro or in the currency of the Member State in which the guarantee is registered. | | GuaranteeType | CL251 | 4 | Individual guarantee in the form of vouchers | | GuaranteeType | CL251 | 5 | Guarantee waiver where the amount of import or export duty to be secured does not exceed the statistical value threshold for declarations laid down in accordance with Article 3(4) of Regulation (EC) No 471/2009 | | GuaranteeType | CL251 | 8 | Guarantee not required for certain public bodies | | GuaranteeType | CL251 | 9 | Individual guarantee with multiple usage (for CTC only) | | GuaranteeType | CL251 | A | Guarantee waiver by agreement | | GuaranteeType | CL251 | B | Guarantee for goods dispatched under TIR procedure | | GuaranteeType | CL251 | J | Guarantee not required for the journey between customs office of departure and customs office of transit - Article 10(2)(b) of the Convention of 20 May 1987 on a common transit procedure |   Also, the wording of **C0085** is presented below:    Based on the Condition C0085, in case the <Guarantee Type> is included in **CL076** the Data Group <GUARANTEE REFERNECE> is activated (optionality ‘Required’).  The values of **CL076** are:   |  |  |  |  | | --- | --- | --- | --- | | destEntityCode | destEntityName | destEntryName | destEntryDescription | | CL076 | GuaranteeTypeWithReference | 0 | Guarantee waiver | | CL076 | GuaranteeTypeWithReference | 1 | Comprehensive guarantee | | CL076 | GuaranteeTypeWithReference | 2 | Individual guarantee in the form of an undertaking by a guarantor | | CL076 | GuaranteeTypeWithReference | 3 | Individual guarantee in cash or other means of payment recognised by the customs authorities as being equivalent to a cash deposit, made in euro or in the currency of the Member State in which the guarantee is | | CL076 | GuaranteeTypeWithReference | 4 | Individual guarantee in the form of vouchers | | CL076 | GuaranteeTypeWithReference | 5 | Guarantee waiver where the amount of import or export duty to be secured does not exceed the statistical value threshold for declarations laid down in accordance with Article 3(4) of Regulation (EC) No 471/2009 | | CL076 | GuaranteeTypeWithReference | 9 | Individual guarantee with multiple usage (for CTC only) |   Furthermore, the **Condition- C0086**, is assigned on <GUARANTEE.GUARANTEE REFERENCE.GRN> in the same messages. The wording of **C0086** is the following:      According to **Condition- C0086**, if the value of <GUARANTEE.Guarantee type> is included in **Codelist-CL286 (GuaranteeTypeWithGRN)**, then theData Items <GUARANTEE.GUARANTEE REFERENCE.GRN> and <GUARANTEE.GUARANTEE REFERENCE.Access code> are required ‘R’, otherwise the optionality of the Data Items is ‘N’ = Not Used.  The values of **codelist- CL286** is the following:   |  |  |  |  | | --- | --- | --- | --- | | name | codelistNumber | dataItem | description | | GuaranteeTypeWithGRN | CL286 | 0 | Guarantee waiver | | GuaranteeTypeWithGRN | CL286 | 1 | Comprehensive guarantee | | GuaranteeTypeWithGRN | CL286 | 2 | Individual guarantee in the form of an undertaking by a guarantor | | GuaranteeTypeWithGRN | CL286 | 4 | Individual guarantee in the form of vouchers | | GuaranteeTypeWithGRN | CL286 | 9 | Individual guarantee with multiple usage (for CTC only) |   In addition, the message structure regarding the Data Group <GUARANTEE REFERENCE> is the following:  Part of **CC015C** message:  …  …  ---GUARANTEE 9x R  ------GUARANTEE REFERENCE 99x D **C0085**  …  …  ------GUARANTEE REFERENCE  Sequence number R n..5 R0987  GRN D an..24 C0086 G0002 R0318  Access code D an..4 C0086 E1118  Amount to be covered O n..16,2 **B2101** R0021  Currency O a3 CL048 B1898 **B2101**  …  …  Under the <Guarantee Reference> Data Group, there are the following Data Items, that are used/ present based on the value of <GUARANTEE.Guarantee type>:   * **GRN** is used in case the <GUARANTEE.Guarantee type> is in   **CL286: GuaranteeTypeWithGRN** {0, 1, 2, 4, 9}, based on C0086   * **Access code** is used in case the <GUARANTEE.Guarantee type> is in   **CL286: GuaranteeTypeWithGRN** {0, 1, 2, 4, 9}, based on C0086   * **Amount to be covered** is used in case the <GUARANTEE.Guarantee type> is in   **CL076:** **GuaranteeTypeWithReference** values {0, 1, 2, 3, 4, 5, 9}, based on C0085 and B2101   * **Currency** is used in case the <GUARANTEE.Guarantee type> is in   **CL076:** **GuaranteeTypeWithReference** values {0, 1, 2, 3, 4, 5, 9}, based on C0086 and B2101  **OUTCOME:**  In messages **CD200C, CD201C, CD203C, CD204C and CD205C** the Data Items <GUARANTEE.GUARANTEE REFERENCE.GRN> and <GUARANTEE.GUARANTEE REFERENCE.Access code> *(if present)* are always Required.  Currently, the **Codelist CL076- GuaranteeTypeWithReference** is assigned on the Data Item <GUARANTEE.Guarantee type> in these messages.  **Part of IE200 message:**  …  …  ---GUARANTEE  Sequence number R n..5 R0987  **Guarantee type** R an1 **CL076**  ------GUARANTEE REFERENCE  Sequence number R n..5 R0987  GRN R an..24 G0002 R0028 R0318  Access code R an..4 E1118  Amount concerned R n..16,2 E1121 R0021  Currency R a3 CL048 R0267  …  …  Based on the fact that only Guarantees with GRN are communicated to the GMS, the messages CD200C, CD201C, CD203C, CD204C and CD205C cannot be exchanged for <GUARANTEE.Guarantee type> values ‘3’ and ‘5’. As a result, the CL076 is considered superfluous and shall be replaced by CL286- GuaranteeTypeWithGRN in these specific messages. |

**Section 3: Description of proposed solution**

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| The **DDNTA-v5.14.1 (incl. Appendix Q2) and the CSE-v51.6.0** shall be corrected as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~):  The ~~Codelist- CL076~~ shall be replaced with the Codelist CL286- GuaranteeTypeWithGRN in messages **CD200C, CD201C, CD203C, CD204C and CD205C.**  The codelist shall be assigned on the Data Item <GUARANTEE.Guarantee type>.  Part of **CD200C.**  …  …  ---GUARANTEE  Sequence number R n..5 R0987  Guarantee type R an1 ~~CL076~~ CL286  ------GUARANTEE REFERENCE  Sequence number R n..5 R0987  GRN R an..24 G0002 R0028 R0318  Access code R an..4 E1118  Amount concerned R n..16,2 E1121 R0021  Currency R a3 CL048 R0267  …  …  The same approach will be followed in CD201C, CD203C, CD204C and CD205C messages.  **NCTS-Data Mapping- v0.43 file:** “NCTS-Data Mapping- v0.43” file will be updated to depict the change that is described above, regarding the messages.  **IMPACT ASSESSMENT:**  This RFC-Proposal describes the replacement of CL076 by the codelist CL286 in the following messages: CD201C, CD203C, CD204C and CD205C. It is considered that the aforementioned change has no impact on business continuity and can therefore be deployed in a **flexible way approach**. More specifically,   * If the sender is aligned with respect to the aforementioned updates (DDNTA-v05.15) while the receiver is not (DDNTA 5.14.1), the respective message will be validated successfully by the receiver since the CL286 is a subset of CL076. * If the sender is not aligned with respect to the aforementioned updates (DDNTA-v05.15), when communicating with NAs that have already deployed this RFC, the messages sent is expected to be validated successfully by the receiver, since the applicable values, when GRN is required, are those included in the CL286.   **Movement initiated under the previous DDNTA (5.14.1) release which continues its flow under the new DDNTA (5.15.0) release (open movement):**   * If a movement was initiated under the previous DDNTA (DDNTA 5.14.1) release and continues its flow under the new DDNTA (DDNTA 5.15.0) release (open movement), no issue is foreseen, since as mentioned above the CL286 is a subset of CL076 and the applicable values (when GRN is required), are those included in the CL286.   **Impact in case of no Implementation**  In case of not implementing this change, no issues are foreseen, as indicated in the above analysis.    **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):                     July 2022  **Expected** date of approval by ECCG (T-CAB):                  January 2022  **Impact on transition**: None  **Risk of not implementing the change:** None    Impacted messages:   * Common Domain Messages: CD200C, CD201C, CD203C, CD204C, CD205C   Impacted CI Artefacts:   * **CSE-v51.6.0: Yes;** * **DDNTA-v5.14.1 (Appendix Q2, PDFs): Yes;** * **DMP Package-v5.6.0 SfA-v1.00: No (incl. NCTS- Data Mapping- v0.43 file): Yes;** * **CTP-5.7.0-v1.00: Yes;** * **TRP-5.7.5: Yes;** * Functional Specifications (FSS/BPM): No; * DDNTA-5.14.1-v1.00 (Main Document): No; * UCC IA/DA Annex B: No; * CTS-5.6.1-v1.00: No; * CRP-v5.5-v1.00: No; * ACS - v5.5.0 & ACS-Annex-NCTS: 5.5.0: No; * DDCOM v20.3.0-v1.00: No; * ieCA 1.0.1.0: 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**

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| **CSE-v51.6.0** | | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **As described in section 3** | | |
| **DDNTA-v5.14.1 (Appendices)** | | Cosmetic  Low  Medium  High  Very High   |  | | --- | | **Update of DDNTA\_APP\_Q2-v5.14-SfA.pdf** | | |
| **DMP Package-v5.6.0** | | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **NCTS- Data Mapping- v0.43 file** | | |
| **CTP-5.7.0-v1.00** | | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of scenarios according to the updates of specifications.** | | |

**Estimated impact on National Project**

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

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| **Document History** | | |  |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by CUSTDEV | 22/04/2021 |  |
| v0.20 | Draft by CUSTDEV | 02/11/2021 | *Updates by CD3 Team* |
| v0.21 | Updates by CUSTDEV | 15/12/2021 | *Version Update* |
| v1.00 | SfA to NPMs | 25/02/2022 | SfA to NPMs |