# Impact Analysis Report/ RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0172** (RTC-59804) |
| **Related Incident ID** | IM472816 |
| **RFC Initiator / Organization** | NA-ES, TAXUD/B3 |
| **CI** | **NCTS-P5 (DDNTA-v5.14.1-v1.00– 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-v1.00 - CSE-v51.6.0): Correction of R0601 and correction of the Export Followed by Transit interface.** |
| An RFC-Proposal that corrects the R0601 and improves the specifications for the movements ‘Export Followed by Transit’, in particular for the *excise goods*. Cover corrections on National Domain, Common Domain and optimisation of the External Domain. Also includes corrections of CS/RD Reference Data. |

**Section 2: Problem Statement**

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| 1. **The R0601 defined in DDNTA-5.14.0-v1.00 is not aligned to the legislation.**   As reported by MS, the wording of R0601 defined in DDNTA is not correct.  Part of R0601 definition applicable for T1 goods (Technical Description):  *IF /\*/Consignment/HouseConsignment/ConsignmentItem/****SupportingDocument****/type is in SET {C651, C658}*  *THEN*  *IF /\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is PRESENT*  *THEN (/\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is EQUAL to ‘T1’*  *AND /\*/TransitOperation/declarationType is EQUAL to ‘T’)*  *ELSE /\*/TransitOperation/declarationType is EQUAL to ‘T1’;*  But the legislation does not allow C651/C658 **as Supporting document**  *COUNCIL DIRECTIVE (EU) 2020/262 of 19 December 2019, referral*  *(23) In order to allow the use of the external transit procedure following the export procedure, the customs office of exit should become a possible destination of a movement under excise duty suspension. The moment when the duty suspension arrangement ends in that case should be specified. It should be specified that the competent authorities in the Member State of export should complete the report of export on the basis of the confirmation of exit which the customs office of exit sends to the customs office of export at the start of the external transit procedure. In order to allow the external transit procedure to take over the responsibilities for the excise goods under this Directive, Article 189 of Commission Delegated Regulation (EU) 2015/2446 (10) has been amended by Commission Delegated Regulation (EU) 2018/1063 (11). Consequently, Union excise goods should also be allowed to be placed under the external transit procedure.*  *Article 19*  *Beginning and end of movements of excise goods under duty suspension.*  *2. The movement of excise goods under a duty suspension arrangement shall end:*  *..*  *(c) in the cases referred to in point (a)(v) of Article 16(1), when the goods are placed under the external transit procedure."*  *Article 16*  *General provisions for the place of dispatch and of destination of the movement*  *1. Excise goods may be moved under a duty suspension arrangement between the following places within the territory of the Union, including via a third country or a third territory:*  *(a) from a tax warehouse to:*  *(v)*  *the customs office of exit where provided for in Article 329(5) of Implementing Regulation (EU) 2015/2447 which is at the same time the customs office of departure for the external transit procedure where provided for in Article 189(4) of Delegated Regulation (EU) 2015/2446;*  Part of R0601 definition applicable for T2 goods (Technical Description):  *IF /\*/Consignment/HouseConsignment/ConsignmentItem/****PreviousDocument****/type is in SET {C651,C658}*  *THEN*  *IF /\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is PRESENT*  *THEN (/\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is in SET {T2, T2F}*  *AND /\*/TransitOperation/declarationType is EQUAL to ‘T’)*  *ELSE /\*/TransitOperation/declarationType is in SET {T2, T2F}*  Legislation only allows C651/C658 as ‘**Supporting document**’ (i.e. not as ‘Previous document’) in case of T2 movement.  *Article 16*  *General provisions for the place of dispatch and of destination of the movement*  *1. Excise goods may be moved under a duty suspension arrangement between the following places within the territory of the Union, including via a third country or a third territory:*  *(a) from a tax warehouse to:*  *(i) another tax warehouse;*  *(ii) a registered consignee;*   1. **The message CC190C defined in DDNTA-5.14.0-v1.00 is not identical to CC190C defined in DDNXA-5.14.0-v1.00**   Despite it’s the *same* message, the R&C defined in the DDNTA and DDNXA are not identical. It must be corrected.   1. **The logic applied for the AES-P1/NCTS-P5 interface is based on a *wrong* assumption.**   The logic applied for the AES-P1/NCTS-P5 interface is based on the wrong assumption that the ‘Holder of the Transit Procedure’ can always lodge a transit declaration that includes all the necessary details about the exported goods and - where applicable - with all the necessary details of the EMCS declaration. This is not in line with the reality.  In the current approach of the EFBT (defined in DDNxA-5.14.0), the ARC number (i.e. the reference number when ‘C651’ is used) or the fallback eAD number (i.e. the reference number when ‘C658’ is used) must be provided by the Holder of the Transit Procedure, *assuming that this information was correctly provided by the Exporter or it’s representative and properly managed and included as needed in the IE015 lodged by the Holder*. In case the Holder of the Transit Procedure ‘forgets’ to mention the ‘C651’ or ‘C658’, the AES application will detect the inconsistency and the cross-check validation with EMCS will fail. The CC191C will include a negative value for /AES RESULTS/EXPORT OPERATION/Result indicator, blocking the release of the transit movement.  This would force the Holder of the Transit Procedure to amend the declaration with the right information about excise goods.   1. **The AES-P1/NCTS-P5 interface defined in DDNxA-5.14.0 is not precise enough.**   The AES-P1/NCTS-P5 interface defines in DDNTA-5.14.0 does not specify that each House Consignment must include ALL the goods listed in the related export movement and ONLY those goods. It must also be specified that the order of the goods items listed in an IE015 HC must respect strictly the order of the goods items listed in an IE515. Those instructions are absolutely necessary to be able to enforce a strict control on the Export Followed by Transit procedure. It also facilitates the tracing of excise goods in case of EFBT. |

**Section 3: Description of proposed solution**

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| The **DDNTA-v5.14.1 and the CSE-v51.6.0** shall be corrected as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~ ):   1. **The R0601 is corrected:**   **Technical Description:**  IF /\*/Consignment/HouseConsignment/ConsignmentItem/~~SupportingDocument~~AdditionalReference/type is in SET ~~{C651, C658}~~ CL234 (DocumentTypeExcise)  *(i.e. Export of excise goods followed by transit (EMCS&AES+NCTS))*  THEN  IF /\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is PRESENT  THEN (/\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is  EQUAL to ‘T1’  ~~AND /\*/TransitOperation/declarationType is EQUAL to ‘T’)~~  AND /\*/Consignment/HouseConsignment/PreviousDocument/type is EQUAL to ‘N830’)  ELSE (/\*/TransitOperation/declarationType is ~~EQUAL to ‘T1’;~~in SET {‘T1’, ‘TIR’}  AND /\*/Consignment/HouseConsignment/PreviousDocument/type is EQUAL to ‘N830’);  IF /\*/Consignment/HouseConsignment/ConsignmentItem/~~PreviousDocument~~SupportingDocument/type is in SET ~~{C651, C658}~~CL234 (DocumentTypeExcise)  *(i.e. Transit movement of EU goods under excise suspension (EMCS+NCTS))*  THEN  IF /\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is PRESENT  THEN ~~(~~/\*/Consignment/HouseConsignment/ConsignmentItem/declarationType is in SET  {T2, T2F}  ~~AND /\*/TransitOperation/declarationType is EQUAL to ‘T’)~~  ELSE /\*/TransitOperation/declarationType is in SET {T2, T2F}  **Description:**  IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-~~SUPPORTING DOCUMENT~~ADDITIONAL REFERENCE.Type> is in SET ~~{C651, C658}~~CL234 (DocumentTypeExcise)  *(i.e. Export of excise goods followed by transit (EMCS&AES+NCTS))*  THEN  IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM. Declaration  type> is PRESENT  THEN (<CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM. Declaration type> is EQUAL to ‘T1’  ~~AND <TRANSIT OPERATION.Declaration type> is EQUAL to ‘T’)~~  AND <CONSIGNMENT-HOUSE CONSIGNMENT-PREVIOUS DOCUMENT.Type> is EQUAL to ‘N830’)  ELSE (<TRANSIT OPERATION.Declaration type> is ~~EQUAL to ‘T1’;~~ in SET {‘T1’, ‘TIR’}  AND <CONSIGNMENT-HOUSE CONSIGNMENT-PREVIOUS DOCUMENT.Type> is EQUAL to ‘N830’);  IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM- ~~PREVIOUS DOCUMENT~~ SUPPORTING DOCUMENT.Type> is in SET ~~{C651, C658}~~ CL234 (DocumentTypeExcise)  *(i.e. Transit movement of EU goods under excise suspension (EMCS+NCTS))*  THEN  IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM. Declaration type> is PRESENT  THEN ~~(~~<CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM. Declaration type> is in SET {T2, T2F}  ~~AND <TRANSIT OPERATION.Declaration type> is EQUAL to ‘T’)~~  ELSE <TRANSIT OPERATION.Declaration type> is in SET {T2, T2F}  A BRT will be used in order to invalidate R0601 in Common Domain CD001C, CD003C, CD050C, CD038C, CD115C, CD165C, CC013C and CC015C. The proposed numbering for the new BRT is **B1922,**  based on DDCOM-v20.3.0 SfA in section “IV.4-Numbering Convention for Rules & Conditions (R/C/T/TRT/BRT/S/G) for NCTS-P5 and AES-P1”.  **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN R0601 will be disabled AND  IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-ADDITIONAL REFERENCE.Type> is in SET CL234 (DocumentTypeExcise)  (i.e. Export of excise goods followed by transit (EMCS&AES+NCTS))  THEN  IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM. Declaration  type> is PRESENT  THEN (<CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM. Declaration type> is EQUAL to ‘T1’  AND <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-PREVIOUS DOCUMENT.Type> is EQUAL to ‘N830’)  ELSE (<TRANSIT OPERATION.Declaration type> is in SET {‘T1’, ‘TIR’}  AND <CONSIGNMENT-HOUSE CONSIGNMENT-PREVIOUS DOCUMENT.Type> is EQUAL to ‘N830’);  ELSE IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-SUPPORTING DOCUMENT.Type> is in SET CL234 (DocumentTypeExcise)  (i.e. Transit movement of EU goods under excise suspension (EMCS+NCTS))  THEN  IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM. Declaration type> is PRESENT  THEN <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM. Declaration type> is in SET {T2, T2F}  ELSE <TRANSIT OPERATION.Declaration type> is in SET {T2, T2F}  **Functional Description:**  N/A  **B1922** will be introduced to CD001C, CD003C, CC013C, CC015C, CD038C, CD050C, CD115C, CD160C and CD0165C at ‘TRANSIT OPERATION.Declaration type’ and ‘CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM. Declaration type’ Data Items.   1. **The structure of the Data Group <ADDITIONAL REFERENCE> is modified as follows:**   **Part of CD001C:**  (…)  CONSIGNMENT ITEM ~~9~~999x R E1402  ADDITIONAL REFERENCE 99x O E1407  G0825  ---------Sequence number R n..5 R0987  ---------Type R an4 CL380  G0057  ---------Reference number ~~O~~ D an..70 E1104  C0015  R0023  ~~R0021,~~ G0321[[1]](#footnote-1)  G0050    (…)  The wording of the new **Condition-C0015** will be the following:  **Technical Description:**  IF /\*/Consignment/HouseConsignment/ConsignmentItem/AdditionalReference/type is in SET CL234(DocumentTypeExcise)  THEN /\*/Consignment/HouseConsignment/ConsignmentItem/AdditionalReference/referenceNumber = “R”  ELSE /\*/Consignment/HouseConsignment/ConsignmentItem/AdditionalReference/referenceNumber = “O”  **Functional Description:**  IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-ADDITIONAL REFERENCE.Type> is in SET CL234 (DocumentTypeExcise)  THEN <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-ADDITIONAL REFERENCE.Reference number> = “R”  ELSE <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-ADDITIONAL REFERENCE.Reference number> = “O”  The wording of the new **Guideline-G0050** will be the following:  **Technical Description:**  N/A  **Functional Description:**  The Reference number shall include the ARC number or the fallback eAD reference number when the ‘Type’ of the ‘Additional reference’ is C651 or C658 respectively.  A new Rule will be introduced and assigned on <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-ADDITIONAL REFERENCE.Reference number> to avoid the value ‘0’ in case the <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-ADDITIONAL REFERENCE.Type> is in SET CL234 (DocumentTypeExcise). **The proposed numbering for the new Rule is R0023, based on DDCOM-v20.3.0 SfA in section “IV.4-Numbering Convention for Rules & Conditions (R/C/T/TRT/BRT/S/G) for NCTS-P5 and AES-P1”.**  The wording of the new **Rule-R0023** will be the following:  **Technical Description:**  IF /\*/Consignment/HouseConsignment/ConsignmentItem/AdditionalReference/type is in SET CL234 (DocumentTypeExcise)  THEN /\*/Consignment/HouseConsignment/ConsignmentItem/AdditionalReference/referenceNumber shall not be ‘0’ (zero)  **Functional Description:**  IF <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-ADDITIONAL REFERENCE.Type> is in SET CL234 (DocumentTypeExcise)  THEN <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-ADDITIONAL REFERENCE.Reference number> shall not be ‘0’ (zero)  The aforementioned updates will be performed in messages: CD001C, CD003C, CD012C, CC013C, CC015C, CC017C (only R0023), CD018C (only R0023), CC029C, CD038C, CC043C, CC044C (only R0023), CD050C, CD115C, CD160C and CD165C, at ‘CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-ADDITIONAL REFERENCE.Reference number’ Data Item. In addition, this Data Item will be set to Dependent in all the aforementioned messages.  **For information:** If the IE015 does not include the C651/C658 in Additional Reference, the information received from AES (via IE191) will be included in the IE001 after acceptance by the Holder of the Transit Procedure of the discrepancies recorded with IE017.   1. **The consistency between IE501 and IE015 will be improved**   The following changes are applicable in CC013C, CC015C, CC029C and CC017C  **Part of CC015C:**  (…)  CONSIGNMENT ITEM ~~9~~999x R ~~E1402~~  G0071  ------ Goods item number R n..5 R0988  G0072  ------ Declaration goods item number R n..5 R0007  G0005[[2]](#footnote-2)  ------ Declaration type D an..5 CL232 C0045  G0062  R0601  R0909  (..)  In addition, a new Guideline will be introduced in <CONSIGNMENT ITEM>. The proposed numbering is **G0071,** based on DDCOM-v20.3.0 SfA in section “IV.4-Numbering Convention for Rules & Conditions (R/C/T/TRT/BRT/S/G) for NCTS-P5 and AES-P1”.  **G0071:**  **Technical Description:**  N/A  **Functional Description:**  In case of Export Followed by Transit (i.e. <CONSIGNMENT-HOUSE CONSIGNMENT- PREVIOUS DOCUMENT. Type> = ‘N830’), all and only the goods items declared in <GOODS SHIPMENT-GOODS ITEM> as defined in the related Export declaration (identified by the MRN) must be included in <CONSIGNMENT-HOUSE CONSIGNMENT- CONSIGNMENT ITEM> Data Group.  In addition, a new Guideline will be introduced in <CONSIGNMENT ITEM. Goods item number>. The proposed numbering is **G0072,** based on DDCOM-v20.3.0 SfA in section “IV.4-Numbering Convention for Rules & Conditions (R/C/T/TRT/BRT/S/G) for NCTS-P5 and AES-P1”.  **G0072:**  **Technical Description:**  N/A  **Functional Description:**  In case of Export Followed By Transit (<CONSIGNMENT-HOUSE CONSIGNMENT- PREVIOUS DOCUMENT.Type> = ‘N830’),   * all the goods items declared in <GOODS SHIPMENT-GOODS ITEM> as defined in the related Export declaration (identified by the MRN) and * all the goods items declared in the <CONSIGNMENT-HOUSE CONSIGNMENT- CONSIGNMENT ITEM> defined in the transit declaration   must be listed in the same order (with <GOODS SHIPMENT-GOODS ITEM. Declaration goods item number> = <CONSIGNMENT-HOUSE CONSIGNMENT- CONSIGNMENT ITEM. Goods item number>). Keeping the order of the goods item is required to enable the automatic validation of the matching of the goods in the context of Export followed by Transit.   1. **Correction in the CC190C- TRANSIT PRESENTATION NOTIFICATION:**   (…)  ---TRANSIT OPERATION 1x R  …  …  Declaration acceptance date D an10 C0707  G0002  Amendment acceptance date and time D an19 C0708  G0002  ------EXPORT OPERATION ~~9~~99x R  ------ Sequence number R n..5 R0987  ------ MRN R an18 G0002  ------ Transit procedure category R n1 CL166 R0720  G0073  (…)  A new Guideline will be introduced in < EXPORT OPERATION. Transit procedure category>. The proposed numbering is **G0073,** based on DDCOM-v20.3.0 SfA in section “IV.4-Numbering Convention for Rules & Conditions (R/C/T/TRT/BRT/S/G) for NCTS-P5 and AES-P1”.  **G0073:**  **Technical Description:**  N/A  **Functional Description:**  When the ‘AES communication purpose’ is EQUAL to ‘2’ (= Allocation of the export MRN(s) referenced in the transit declaration), if the previous message CC191C includes one or more excise goods (i.e. <CC191C-AES RESULTS-EXPORT OPERATION-GOODS SHIPMENT> is PRESENT) then it is an external transit procedure (i.e. the <CC190C-TRANSIT OPERATION-EXPORT OPERATION. Transit procedure category> shall be equal to ‘1’= External Transit Procedure) for that (or those) Export MRN(s).  In addition:  (..)  HOUSE CONSIGNMENT 1x R  ------CONSIGNMENT ITEM ~~9~~999x R  ------ Goods item number R n..5 G0072  ------ Declaration goods item number R n..5 G0005[[3]](#footnote-3)  --------- COMMODITY 1x R  ------------COMMODITY CODE 1x R  ------------ Harmonized System sub-heading code R an6 CL152  ------------ Combined nomenclature code O an2  ------------ GOODS MEASURE 1x R  ------------ Net mass R n..16,6  ------------ Supplementary units D n..16,6 C0862  ~~--------- SUPPORTING DOCUMENT 1x D C0863, G0068~~  ~~--------- Type R an4 CL234~~  ~~--------- Reference number R an..70 G0324, R0021~~  ~~--------- Document line item number R n..5 G0325~~  (…)   1. **Correction in the CC191C- TRANSIT PRESENTATION NOTIFICATION RESPONSE:**   (…)  AES RESULTS 1x R  AES communication purpose R n1 CL158  Response date and time R an19 G0002  Global validation response R n1 CL027 R0551  --- EXPORT OPERATION ~~9~~99x R  --- Sequence number R n..5 R0987  --- MRN R an18 G0002  --- Security R n1 CL217 G0022  --- Result indicator R an2 CL100 R0875  ------ GOODS SHIPMENT 1x D C0867  ---------GOODS ITEM 999x R G0990  --------- Export Declaration goods item number R n..5 G0999[[4]](#footnote-4)  --------- Transit Declaration goods item number R n..5 G0005[[5]](#footnote-5)  ------------ PREVIOUS DOCUMENT 1x R  ------------ Type R an4 CL234  ------------ Reference number R an..70 G0074  (…)  According to the message structure, a new Condition will be assigned on the Data Group <GOODS SHIPMENT>. The proposed numbering is **C0867.**  **Technical Description:**  IF /CD501C/GoodsShipment/GoodsItem/PreviousDocument/type is in SET CL234  THEN /CC191C/AESResults/ExportOperation/GoodsShipment = "R"  ELSE /CC191C/AESResults/ExportOperation/GoodsShipment = "N"  **Functional Description:**  IF <CD501C-HOLDER OF THE TRANSIT PROCEDURE> is in SET CL234 (DocumentTypeExcise)  THEN <CC191C-AES RESULTS-EXPORT OPERATION-GOODS SHIPMENT> = "R"  ELSE <CC191C-AES RESULTS-EXPORT OPERATION-GOODS SHIPMENT> = "N"  Furthermore, the Guideline **G0990** will be assigned on <GOODS ITEM> level (message IE191) with the following wording:  **Technical Description:**  N/A  **Functional Description:**  It will include only the information for the Goods Items that are excise goods (i.e. with <GOODS SHIPMENT- GOODS ITEM-PREVIOUS DOUMENT. Type> being C651 or C658).  The wording of **G0999** (introduced also in AES) will be the following:  **Technical Description:**  N/A  **Functional Description:**  The format is defined as 'n..5', but the maximum value for AES is '999', taking into account the multiplicity '999x' of the Data Group.  The Guideline G0999, will be assigned on ‘GOODS SHIPMENT- GOODS ITEM. Export Declaration goods item number’ in CC191C.  In addition, a new Guideline will be assigned on <CC191C-AES RESULTS-EXPORT OPERATION-GOODS SHIPMENT- PREVIOUS DOCUMENT. Reference number> in message IE191. The proposed numbering is **G0074.**  **Technical Description:**  N/A  **Functional Description:**  The Administrative Reference Code (ARC) or the fallback e-AD reference number shall be recorded in this Data Item.  Taking into consideration the aforementioned changes, **R0817** shall be removed from Data Item <CONSIGNMENT-HOUSE CONSIGNMENT- CONSIGNMENT ITEM-**SUPPORTING DOCUMENT. Document line item number>**. The Rule is currently applicable to CC013C and CC015C as presented below:  (…)  Complement of information O an..35 E1117  ------------SUPPORTING DOCUMENT  Sequence number R n..5 R0987  Type R an4 CL213 G0057  Reference number R an..70 E1104  G0414  ~~R0021~~ G0321[[6]](#footnote-6)  ~~R0414~~  Document line item number O n..5 ~~R0817~~  Complement of information O an..35 E1117  ------------TRANSPORT DOCUMENT  (…)  In addition, Guideline **G0069** shall be removed from Data Group <CONSIGNMENT- HOUSE CONSIGNMNET – CONSIGNMENT ITEM- PREVIOUS DOCUMENT> and shall be assigned on <CONSIGNMENT- HOUSE CONSIGNMENT – CONSIGNMENT ITEM- SUPPORTING DOCUMENT>, in messages CC013C and CC015C.  The wording of **G0069** will be updated as follows:  **Technical Description:**  N/A  **Functional Description:**  The Data Group <CONSIGNMENT- HOUSE CONSIGNMENT- CONSIGNMENT ITEM- ~~PREVIOUS~~SUPPORTING  DOCUMENT>, can be also used to include the information related to EMCS consignment (where  <CONSIGNMENT- HOUSE CONSIGNMENT- CONSIGNMENT ITEM- ~~PREVIOUS~~SUPPORTING  DOCUMENT.~~Previous Document~~ Type> is in SET ~~{C651, C658}~~ CL234 (DocumentTypeExcise)), transported from one EU member state into another EU member state via a CTC country.  Also, the Guideline **G0068** shall be removed from Data Group <CONSIGNMENT- HOUSE CONSIGNMNET – CONSIGNMENT ITEM- SUPPORTING DOCUMENT> and shall be assigned on <CONSIGNMENT- HOUSE CONSIGNMNET – CONSIGNMENT ITEM- ADDITIONAL REFERENCE>, in messages CC013C, CC015C and CC190C.  The wording of **G0068** will be updated as follows:  **Technical Description:**  N/A  **Functional Description:**  The Data Group <CONSIGNMENT- HOUSE CONSIGNMENT- CONSIGNMENT ITEM- ~~SUPPORTING~~  ~~DOCUMENT~~ ADDITIONAL REFERENCE> will be also used to include the information of EMCS consignment exported from one  EU member state into a Non-EU-Member state, in case of Export Followed by Transit (where in  messages CC013C or CC015C the <CONSIGNMENT- HOUSE CONSIGNMENT- PREVIOUS  DOCUMENT.Type> = ‘N830’ AND <CONSIGNMENT- HOUSE CONSIGNMENT- CONSIGNMENT  ITEM- ~~SUPPORTING DOCUMENT~~ ADDITIONAL REFERENCE. Type> is in SET ~~{C651, C658}~~ CL234 (DocumentTypeExcise)).  In this case, the Data Group <GOODS SHIPMENT- GOODS ITEM- PREVIOUS DOCUMENT> of the  Export declaration, will be mapped with the Data Group <CONSIGNMENT- HOUSE CONSIGNMENT-  CONSIGNMENT ITEM- ~~SUPPORTING DOCUMENT~~ADDITIONAL REFERENCE> of the Transit declaration.  **Part of CC015C message:**  (…)  ---------CONSIGNMENT ITEM 9999x R E1402  (…)  ------------PREVIOUS DOCUMENT 99x O B1000  E1401  ~~G0069~~  G0825  ------------SUPPORTING DOCUMENT 99x O E1407  ~~G0068~~  G0069  G0825  ------------TRANSPORT DOCUMENT 99x O B1896  B2400  E1407  ------------ADDITIONAL REFERENCE 99x O E1407  G0825  G0068  (…)  Due to the above changes, Guideline- **G0414** shall be removed from <CONSIGNMENT- HOUSE CONSIGNMENT- CONSIGNMENT ITEM- PREVIOUS DOCUMENT. Reference number>  and shall be assigned on <CONSIGNMENT- HOUSE CONSIGNMENT- CONSIGNMENT ITEM-SUPPORTING DOCUMENT. Reference number>, in messages CC013C and CC015C.  **Part of CC015C:**  (…)  ------------PREVIOUS DOCUMENT  Sequence number R n..5 R0987  Type R an4 CL214 G0057  R0020  Reference number R an..70 E1104  ~~G0414~~  ~~R0021~~  G0321  Goods item number O n..5 G0058  Type of packages O an2 CL017  Number of packages O n..8  Measurement unit and qualifier D an..4 CL349 C0298  Quantity O n..16,6  Complement of information O an..35 E1117  ------------SUPPORTING DOCUMENT  Sequence number R n..5 R0987  Type R an4 CL213 G0057  Reference number R an..70 E1104  G0414  ~~G0424~~  ~~R0021~~ G0321[[7]](#footnote-7)  ~~R0414~~  Document line item number O n..5 ~~R0817~~  Complement of information O an..35 E1117  (…)  ------------ADDITIONAL REFERENCE  Sequence number R n..5 R0987  Type R an4 CL380 G0057  Reference number O an..70 E1104  C0015  G0424  R0023  ~~R0021~~ G0321[[8]](#footnote-8)  G0050  (…)  The existing **G0414** shall be applied in <CONSIGNMENT- HOUSE CONSIGNMENT- CONSIGNMENT ITEM-SUPPORTING DOCUMENT. Reference number>  in messages CC015C, CC013C with the following wording:  **Technical Description:**  N/A  **Functional Description:**  In case of excise goods where <CONSIGNMENT.HOUSE CONSIGNMENT.CONSIGNMENT ITEM.SUPPORTING  DOCUMENT.Type> is EQUAL to 'C651 -AAD -Administrative Accompanying Document (EMCS)', the  Administrative Reference Code (ARC number) shall be recorded in this field;  In case of excise goods where <CONSIGNMENT.HOUSE CONSIGNMENT.CONSIGNMENT ITEM.SUPPORTING  DOCUMENT.Type> is EQUAL to 'C658 -FAD -Fallback e-AD (EMCS)', the national Fallback  registration number shall be recorded in this field.  The existing **G0424** will be assigned on <CONSIGNMENT- HOUSE CONSIGNMENT- CONSIGNMENT ITEM- ADDITIONAL REFERENCE. Reference number> in messages CC015C, CC013C with the following wording:  **Technical Description:**  N/A  **Functional Description:**  In case of excise goods where <CONSIGNMENT.HOUSE CONSIGNMENT.CONSIGNMENT ITEM.ADDITIONAL REFERENCE.Type> is EQUAL to 'C651 -AAD -Administrative Accompanying Document (EMCS)', the  Administrative Reference Code (ARC number) shall be recorded in this field;  In case of excise goods where <CONSIGNMENT.HOUSE CONSIGNMENT.CONSIGNMENT ITEM.ADDITIONAL REFERENCE.Type> is EQUAL to 'C658C -FAD -Fallback e-AD (EMCS)’, the national Fallback registration number shall be recorded in this field.  Furthermore, **R0414** will be totally removed from all messages.   1. **In CS/RD2 CONF & PROD:**    * CL380 (AdditionalReference) shall be modified:      + ‘C651’ and ‘C658’ shall become valid for NCTS-P5 (only).    * The codes ‘C651’ and ‘C658’ remain valid in CL213 (‘SupportingDocument’)and the applicability NCTS-P5 shall be removed for those two codes in CL214 (‘PreviousDocumentType’).    * CL999 will be corrected as required, considering the new mapping of the codes.    * CL100 modified for N3:   N3 = Negative due to failure of cross-check validation ~~(EMCS)~~  **Upgrade:**  No issue for upgrade  **Downgrade:**  In case of excise goods where CONSIGNMENT.HOUSE CONSIGNMENT.CONSIGNMENT ITEM.ADDITIONAL REFERENCE.Type is in set {‘C651’, ‘C658’}, the data Group will not be mapped with NCTS. P4-GOODS ITEM.PRODUCED DOCUMENTS/CERTIFICATES and nor with NCTS. P4-GOODS ITEM.PREVIOUS ADMINISTRATIVE REFERENCES. Acceptable loss of information.  In case of excise goods where CONSIGNMENT.HOUSE CONSIGNMENT.CONSIGNMENT ITEM.SUPPORTING DOCUMENT.Type is in set {‘C651’, ‘C658’}), the data Group will not be mapped with NCTS. P4-GOODS ITEM.PRODUCED DOCUMENTS/CERTIFICATES and nor with NCTS. P4-GOODS ITEM.PREVIOUS ADMINISTRATIVE REFERENCES. Acceptable loss of information.   1. **Changes in the DDNXA-5.14.0-v1.00 – Main Document**   For more details, please refer to AES RFCs: **RFC\_NCTS\_0130 (RTC-59817)**.   1. **Changes in the DDNTA-5.14.0-v1.00 – Main Document**   **A/ The following updates will be performed in the section** **“III.II.7 Export Followed by Transit (EFT)”:**  (…)  The validations to be performed as part of the cross-checking of the transit declaration against the export referenced data that is executed by the AES at the Office of Exit are classified according to their optionality (Minimum-Mandatory, Extended-Recommended, Excise-Specific), as follows:  Minimum-Mandatory: MRN existence and appropriate state (at the Office of Exit);  Extended-Recommended: The same Commodity Code (between Transit Declaration and Export Declaration for the referenced export MRN);  Excise-Specific (in addition to the abovementioned checks):   * + ARC~~+UBR~~[[9]](#footnote-9);   + CN Code (in case the Extended-Recommended check is not enabled);   + Net mass;   + Supplementary units (note: the check of this data item is not mandatory).   In case of export followed by transit of goods under duty suspension (excise goods), there is no direct check between EMCS and NCTS. The approach is to rely on the existing matching between EMCS and AES that was validated (before the goods were released for export).  **B/ The following updates will be performed in the** **section “III.II.7.1.1 T-TRA-EFT-M-001-Core flow of the export followed by transit - External transit”:**  (…)  **[Step 9]** Upon reception of the positive ‘Transit Presentation Notification Response’ N\_XFT\_RSP (IE191) message, the Office of Departure verifies if the ARC reference number (s) (or the fallback e-AD reference number(s)) received in the ‘Transit Presentation Notification Response’ N\_XFT\_RSP (IE191) is/are also included in the ‘Declaration Data’ E\_DEC\_DAT (IE015). ~~[Step 10]~~ After verifying that the ARC reference number (s) (or fallback e-AD (s)) is/are included in the ‘Declaration Data’ E\_DEC\_DAT (IE015), the Office of Departure accepts the transit declaration and communicates the MRN to the Holder of the Transit Procedure with the ‘MRN Allocated’ E\_MRN\_ALL (IE028) message.  The state of the movement at the Office of Departure is set to [Accepted](#_Office_of_Departure).  (…)  **C/ The following updates will be performed in the section “III.II.7.2.2 T-TRA-EFT-A-005-Lodgement of Transit Declaration having Export as Previous Procedure - Unknown Export MRN and Positive IE503 (before acceptance)”:**  **[Step 12]** Upon reception of the positive ‘Transit Presentation Notification Response’ N\_XFT\_RSP (IE191) message, and in case of external transit the Office of Departure verifies if the ARC reference number (s) (or the fallback e-AD reference number (s)) received in the ‘Transit Presentation Notification Response’ N\_XFT\_RSP (IE191) is/are also included in the ‘Declaration Data’ E\_DEC\_DAT (IE015). No such check is performed in case of internal transit. Therefore, if all validations are passed, the Office of Departure accepts the Transit Declaration and sends the ‘MRN Allocated’ E\_MRN\_ALL (IE028) message to the Holder of the Transit Procedure. The state of the transit movement at the Office of Departure is set to [Accepted](#_Office_of_Departure).  **D/ The following note will be inserted in the section “III.II.7.3.1 T-TRA-EFT-A-006-Amendment of transit declaration having export as previous procedure – Positive Response from AES”:**  Note: In case of amendment of a transit declaration (external transit only), and when excise goods are involved, the Office of Departure shall verify that the ARC reference number (s) (or the fallback e-AD (s)) received in the ‘Transit Presentation Notification Response’ N\_XFT\_RSP (IE191) is/are also included in the ‘Declaration Amendment’ E\_DEC\_AMD (IE013). If not, then the state of the transit declaration shall be set Under Control. In the latter case, the business flow of the transit procedure continues with *Step 11* of the *T-TRA-EFT-A-013-Lodgement of transit declaration having export as previous procedure (external transit) - ARC Reference Number (or fallback e-AD reference number) as exists in Export Declaration data does not match with Transit Declaration Data*  **E/ A new scenario will be introduced “T-TRA-EFT-A-013-Lodgement of transit declaration having export as previous procedure (external transit) - ARC Reference Number (or fallback e-AD reference number) as exists in Export Declaration data does not match with Transit Declaration Data” under the section “III.II.7.2 Lodgement of Transit Declaration having Export as Previous Procedure” to describe what happens when the ARC reference number (or the fallback e-AD reference number) received in the ‘Transit Presentation Notification Response’ N\_XFT\_RSP (IE191) is NOT included in the ‘Declaration Data’ E\_DEC\_DAT (IE015)**  **IMPACT ASSESSMENT:**  This RFC-Proposal impacts the National Domain, the Common Domain and the External Domain.  This RFC-Proposal does not affect the business continuity. It shall deployed as early as possible, in a flexible way before 01.12.2023.  **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 issue is identified if a movement was initiated by an NTA aligned to DDNTA-5.14.0 and continues its flow under the new DDNTA 5.15.0 release (open movement).  **Impact in case of no Implementation**  The exact implementation by each MS of the Export Followed by Transit might be impacted differently by this RFC-Proposal. Some MS may be already aligned to it while other MS are still in the inception phase.  **Proposed** date of applicability in Operations (**T-Ops**):   01.12.2023 - Flexible way  **Proposed** date of applicability in CT (**T-CT**):                     July 2022  **Expected** date of approval by ECCG (**T-CAB**):                  February 2022  **Impact on transition**: No  **Risk of not implementing the change:** Some transit declarations might fail the cross-check, blocking the transit movement before release. The information received by the Office of Destination is not consistent and could create confusion (and the level of control of the transit movements with excise goods might be not appropriate).  **Impacted Messages:**   * CD001C, CD003C, CD012C, CD018C, CD038C, CD050C, CD115C, CD160C and CD165C * CC013C, CC015C, CC017C, CC029C, CC043C, CC044C, CC190C and CC191C   **New or corrected R&C:**   * R0601, R0023, R0817 and R0414 * B1922 * C0015 and C0867 * G0050, G0071, G0072, G0073, G0990, G0069, G0068, G0999 and G0414   **Impacted CIs:**   * **DDNTA-5.14.1-v1.00 (Main Document): Yes;** * **DDNXA-5.14.1-v1.00 (Main Document): Yes;** * **CSE-v51.6.0: Yes;** * **DDNTA-5.14.1-v1.00; (Appendix Q2\_R\_C, K, PDFs): Yes;** * **DDNXA-5.14.1-v1.00; (Appendix Q2\_R\_C, K, PDFs): Yes;** * **(AES & NCTS) DMP Package-v5.6.0 SfA-v1.00 (incl. update of file Rules and Conditions\_v0.43): Yes;** * **NCTS\_TRP-5.8.1: Yes;** * **NCTS\_CTP-5.8.1-v1.00: Yes;** * **CTS-5.6.1-v1.00: Yes;** * **CRP-v5.5-v1.00: Yes;** * ACS - v5.5.0 & ACS-Annex-NCTS: 5.5.0: No; * ieCA 1.0.1.0: No; * CS/MIS2\_DATA: No; * CS/RD2\_DATA: No; * UCC IA/DA Annex B: No; * Functional Specifications (FSS/BPM): No; * DDCOM v20.3.0-v1.00: No; * AES-P1 and NCTS-P5 Long-Lived “Legacy” (L3) Movements Study v1.40: No. |

**Impact on CI artefacts**

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| **DDNTA-5.14.0-v1.00 (Main Document)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **See described in section 3** | |
| **DDNTA-5.14.1-v1.00 (Appendices)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Appendices generated by CSE + Appendix Q2, Q2\_R\_C** | |
| **CSE-** **v51.6.0** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **As described in section 3** | |
| **DMP Package-v5.6.2 SfA-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Rules and Conditions\_v0.43 file to be updated** | |
| **TRP- 5.8.1** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of messages according to the updates of specifications.** | |
| **CTP-5.8.1-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of scenarios according to the updates of specifications.** | |
| **CTS-5.6.1-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of XSLT files according to the updates of specifications.** | |

**Estimated impact on National Project**

|  |  |  |
| --- | --- | --- |
|  | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | This RFC-Proposal likely impacts the national specifications and their specifications for trade.  It affects more significantly the country that would have already implemented a different solution for Export Followed by Transit (in AES and in NCTS) and would like to adopt the new recommended solution. | |

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| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Created by DG TAXUD/B3 | 02/02/2022 | *Version sent to Forerunners* |
| v1.00 | SfA to NPMs | 08/02/2022 | *Updates by CD3* |
| v1.10 | SfA with implementation details | 24/02/2022 | *SfA with implementation details- extra implementation details in green* |

1. as per RFC\_NCTS\_0122 (RTC-51543) [↑](#footnote-ref-1)
2. As per RFC\_NCTS\_0175 (RTC-60055)  [↑](#footnote-ref-2)
3. As per RFC\_NCTS\_0175 (RTC-60055)  [↑](#footnote-ref-3)
4. As per RFC\_AES\_0131 (RTC-60056)  [↑](#footnote-ref-4)
5. As per RFC\_NCTS\_0175 (RTC-60055)  [↑](#footnote-ref-5)
6. As per RFC\_NCTS\_0122 (RTC-51543) [↑](#footnote-ref-6)
7. As per RFC\_NCTS\_0122 (RTC-51543) [↑](#footnote-ref-7)
8. As per RFC\_NCTS\_0122 (RTC-51543) [↑](#footnote-ref-8)
9. The 'ARC' is provided by the competent authorities of the Member State of dispatch upon validation of the draft 'e-AD' (electronic administrative document). See <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:02009R0684-20140213&from=EN> for more information. [↑](#footnote-ref-9)