# Impact Analysis Report/ RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS\_0178** (RTC-60097) |
| **Related Incident ID** | IM486615 |
| **RFC Initiator / Organization** | NA-BE |
| **CI** | **NCTS-P5 (DDNTA-5.14.1-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-5.14.1 CSE-v51.60) – Correction of the wording of G0821 (RISK ANALYSIS)** |
| During the elaboration of the NTA by various MS, it appeared the need to clarify how to fill in the Data Group RISK ANALYSIS. The erroneous wording of the Guideline G0821 is corrected to eliminate confusion. |

**Section 2: Problem statement**

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| Various questions were received from MS about the Data Group RISK ANALYSIS.  This section will clarify the point. The next section defines a correction needed.  In **NCTS-P4** the message structure regarding the Data Group ‘RISK ANALYSIS’ is the following:    The wording of **TR9175** is the following:    The **CL095- RiskAnalysisResultCode in CSRD2** includes the following values:  - B: Common risk analysis result for which an immediate action is required at the Office of First Entry/Transit (can be used in ICS and NCTS)  - D: Common risk analysis result for which an immediate action is required at the Office of Export/Departure (can be used in ECS and NCTS)  - E: Common risk analysis result to be communicated to the Office of Exit (ECS) or Office(s) Transit and Destination (NCTS) (ECS and NCTS)  - N: National risk analysis results. ('N' shall also be used in case of national profile random risk analysis) (can be used in ICS, ECS, NCTS)  - Z: No risk analysis results available (can be used in ICS, ECS, NCTS)  It is proposed to keep in CS/RD2 PROD (CL095) the entries ‘B’ and ‘D’ even if an immediate action is required and this information is not very helpful at the Office of Departure.   * The Code ‘B’ is produced by the Risk Analysis Application of the Country of Transit, when receiving the IE050 or IE115. In fact, this information is never pushed – in NCTS – from the Office of Transit (in EU) to another Customs Office (neither in Security Area nor in EU only). * The Code ‘D’ is produced by the Risk Analysis System of the Country of Departure when the transit is launched (because S&S risk analysis is performed when the transit is launched, while the national risk analysis is performed when the arrival notification is launched). The code D is the last of the 5 digit risk analysis result which is available at the customs office of departure in order to proceed to the recommended customs control. Practically, this information can be sent by the Office of Departure, even if it is not needed for the other Customs Offices. Action is taken immediately by that Office of Departure (in EU or CH or NO), and the goods are released for transit only if the consignment is safe * Codes ‘B’, ‘D’, ‘E’ and ‘N’ and ‘Z’ remain valid in CS/RD2 in CL095 (NCTS-P4), to avoid any change, to avoid any impact on the legacy applications for the remaining few months of transition before NCTS-P5.   When upgrading the messages with values ‘B’ and ‘D’ those values are skipped by the convertor.  On the other hand, in **NCTS-P5** the message structure regarding the Data Group ‘RISK ANALYSIS IDENTIFICATION’ is the following:  **Part of CD001C message:**  cid:image012.jpg@01D81778.6607EF20  cid:image016.png@01D81778.6607EF20  Based on the wording of C0251 (applicable on ‘RISK ANALYSIS’ Data Group):  If “RISK ANALYSIS IDENTIFICATION/Code” has value ‘R’ (= ‘Common risk identified’) or ‘X’ (= ‘National risk identified’) or ‘Y’ (= ‘Combined risk identified (national & common’) then  Then  IF /\*/RiskAnalysisIdentification/code is in SET {R, Y}  (i.e. Common risk identified ; Combined risk identified (national & common))  THEN /\*/RiskAnalysisIdentification/RiskAnalysis = "R"  (i.e. required)  ELSE  IF /\*/RiskAnalysisIdentification/code is EQUAL to ‘X’  (i.e. National risk identified)  THEN  IF the last two characters of /\*/messageSender is in SET CL010 (CountryCodesCommunity)  THEN /\*/RiskAnalysisIdentification/RiskAnalysis = "R"  (i.e. required)  ELSE /\*/RiskAnalysisIdentification/RiskAnalysis = "O"  (i.e. optional)  ELSE /\*/RiskAnalysisIdentification/RiskAnalysis = "N"  If “RISK ANALYSIS IDENTIFICATION/Code” has value ‘N’ (= ‘No risk identified’) or ‘Z’ (= ‘No risk analysis performed’) then “RISK ANALYSIS IDENTIFICATION/RISK ANALYSIS” is not included in the CD001C (last “ELSE” part of C0251)  In addition, according to C0715 and based on the value of “RISK ANALYSIS IDENTIFICATION / Code” the optionality of “RISK ANALYSIS / RISK ANALYSIS RESULT / Code” and “RISK ANALYSIS / RISK ANALYSIS RESULT / Risk area code” is defined as follows:  **“RISK ANALYSIS / RISK ANALYSIS RESULT / Code”**  • IF /RiskAnalysisIdentification/code is EQUAL to ‘R’  THEN /RiskAnalysisIdentification/RiskAnalysis/RiskAnalysisResult/code = "R"  • IF /RiskAnalysisIdentification/code is EQUAL to 'X'  THEN / RiskAnalysisIdentification/RiskAnalysis/RiskAnalysisResult/code = "N"  • IF /RiskAnalysisIdentification/code is EQUAL to 'Y'  THEN / RiskAnalysisIdentification/RiskAnalysis/RiskAnalysisResult/code= "R"  **And the /RISK ANALYSIS RESULT/Code can have the values:**  - B: Common risk analysis result for which an immediate action is required at the Office of First Entry/Transit (can be used in ICS and NCTS). But this information is not pushed to another Customs Office via NCTS.  - D: Common risk analysis result for which an immediate action is required at the Office of Export/Departure (can be used in ECS and NCTS). But this information is not pushed to another Customs Office via NCTS.  - E: Common risk analysis result to be communicated to the Office of Exit (ECS) or Office(s) Transit and Destination (NCTS) (ECS and NCTS)  - N: National risk analysis results. ('N' shall also be used in case of national profilerandom risk analysis) (can be used in ICS, ECS, NCTS). But this information is not pushed to another Customs Office via NCTS, based on C0251 (RiskAnalysisIdentification/code is EQUAL to 'X')  - Z: No risk analysis results available (can be used in ICS, ECS, NCTS). But this code ‘Z’ does not need to be pushed to another Customs Office via NCTS when there is a mix of  • some goods items with risks identified and  • some goods items with no risk analysis performed  Indeed, the probability to have a Common Domain message for a Consignment being partly Risk Analysed is extremely low.  And in those rare cases, the risk analysis can easily be applied again FULLY by the recipient (at Destination or at Transit) on the message from Departure and the SAME Common Risk analysis will lead to the same Risk Results for the goods item already processed. The benefit of sharing the partial risk analysis results seems to be null.  Although, from the above-mentioned values only the value ‘E’ can be used.  • “RISK ANALYSIS / RISK ANALYSIS RESULT / Risk area code”  • IF /RiskAnalysisIdentification/code is EQUAL to ‘R’  THEN /RiskAnalysisIdentification/RiskAnalysis/RiskAnalysisResult/riskAreaCode = "O" (i.e. is optional)  • IF /RiskAnalysisIdentification/code is EQUAL to 'X'  THEN /RiskAnalysisIdentification/RiskAnalysis/RiskAnalysisResult/riskAreaCode = "R" (i.e. is required)  • IF /RiskAnalysisIdentification/code is EQUAL to 'Y'  THEN /RiskAnalysisIdentification/RiskAnalysis/RiskAnalysisResult/riskAreaCode = "R" (i.e. is required)  As a result, based on the aforementioned analysis, G0821 should be updated, and the proposed wording will be the following:  G0821:  The last character of the D.I. <RISK ANALYSIS IDENTIFICATION-RISK ANALYSIS-RISK ANALYSIS RESULT.Code> shall be the value 'E'.  **The related Rules, Conditions and Codelist are presented below:**  **General explanation:**   1. **C0813** defines what NTA will send (depending on who is sending and who is receiving) [i.e. if it’s an NTA in EU or Security Area or other NA]   The wording of **C0813** is the following:     1. Based on **C0251**:   If “RISK ANALYSIS IDENTIFICATION/Code” has value ‘R’ (= ‘Common risk identified’) or ‘X’ (= ‘National risk identified’) or ‘Y’ (= ‘Combined risk identified (national & common’) then  Then  IF /\*/RiskAnalysisIdentification/code is in SET {R, Y}    (i.e. Common risk identified ; Combined risk identified (national & common))  THEN /\*/RiskAnalysisIdentification/RiskAnalysis = "R"   (i.e. required)  ELSE           IF /\*/RiskAnalysisIdentification/code is EQUAL to ‘X’     (i.e. National risk identified)           THEN                    IF the last two characters of /\*/messageSender is in SET CL010   (CountryCodesCommunity)                    THEN /\*/RiskAnalysisIdentification/RiskAnalysis = "R" (i.e. required)                     ELSE /\*/RiskAnalysisIdentification/RiskAnalysis = "O" (i.e. optional)  [         ELSE /\*/RiskAnalysisIdentification/RiskAnalysis = "N" ] ==> Not applicable if ‘R’, ‘X’, ‘Y’  If “RISK ANALYSIS IDENTIFICATION/Code” has value ‘N’ (= ‘No risk identified’) or ‘Z’ (= ‘No risk analysis performed’) then   * “RISK ANALYSIS IDENTIFICATION/RISK ANALYSIS” is not included in the CD001C   (we are in the last “ELSE” part)  The wording of **C0251** is the following:     1. When we have the D.G. “RISK ANALYSIS IDENTIFICATION/RISK ANALYSIS” present (i.e. when it’s required or optional) … 2. What is the possible content of “RISK ANALYSIS / RISK ANALYSIS RESULT / Code”?   Here, we need to evaluate C0715 and the value of “RISK ANALYSIS IDENTIFICATION / Code” (it can only be ‘R’, ‘X’ or ‘Y’, based on C0251).  IF /RiskAnalysisIdentification/code is EQUAL to ‘R’  THEN /RiskAnalysisIdentification/RiskAnalysis/RiskAnalysisResult/code = "R"  IF /RiskAnalysisIdentification/code is EQUAL to 'X'  THEN / RiskAnalysisIdentification/RiskAnalysis/RiskAnalysisResult/code = "N"  IF /RiskAnalysisIdentification/code is EQUAL to 'Y'  THEN / RiskAnalysisIdentification/RiskAnalysis/RiskAnalysisResult/code= "R"  And the /RISK ANALYSIS RESULT/Code can have the values:  - B: Common risk analysis result for which an immediate action is required at the Office of First Entry/Transit (can be used in ICS and NCTS)  🡪 This information is not pushed to another Customs Office via NCTS.  - D: Common risk analysis result for which an immediate action is required at the Office of Export/Departure (can be used in ECS and NCTS)  🡪 This information is not pushed to another Customs Office via NCTS.  - E: Common risk analysis result to be communicated to the Office of Exit (ECS) or Office(s) Transit and Destination (NCTS) (ECS and NCTS)  - N: National risk analysis results. ('N' shall also be used in case of national profile random risk analysis) (can be used in ICS, ECS, NCTS)  🡪 This information is not pushed to another Customs Office via NCTS, based on C0251 (RiskAnalysisIdentification/code is EQUAL to 'X')  - Z: No risk analysis results available (can be used in ICS, ECS, NCTS)  🡪 This code ‘Z’ does not need to be pushed to another Customs Office via NCTS when there is a mix of   * some goods items with risks identified and * some goods items with no risk analysis performed   Indeed, the probability to have a Common Domain message for a Consignment being partly Risk Analysed is extremely low.  And in those rare cases, the risk analysis can easily be applied again FULLY by the recipient (at Destination or at Transit) on the message from Departure and the SAME Common Risk analysis will lead to the same Risk Results for the goods item already processed. The benefit of sharing the partial risk analysis results seems to be null.   1. What is the possible content of “RISK ANALYSIS / RISK ANALYSIS RESULT / Risk area code”?   IF /RiskAnalysisIdentification/code is EQUAL to ‘R’  THEN /RiskAnalysisIdentification/RiskAnalysis/RiskAnalysisResult/riskAreaCode = "O" (i.e. is optional)  IF /RiskAnalysisIdentification/code is EQUAL to 'X'  THEN /RiskAnalysisIdentification/RiskAnalysis/RiskAnalysisResult/riskAreaCode = "R" (i.e. is required)  IF /RiskAnalysisIdentification/code is EQUAL to 'Y'  THEN /RiskAnalysisIdentification/RiskAnalysis/RiskAnalysisResult/riskAreaCode = "R" (i.e. is required)  Related Rules, Conditions and Codelists:  **CL010 = CountryCodesCommunity**  AT = Austria  AX = ÅLAND ISLANDS  BE = Belgium  BG = Bulgaria  CY = Cyprus  CZ = Czechia  DE = Germany  DK = Denmark  EE = Estonia  ES = Spain  FI = Finland  FR = France  GF = French Guyana  GP = Guadeloupe  Etc …  **CL095 (NCTS-P4):**  B  D  E  Z  **CL107 = RiskAnalysisIndicator**  N = No risk identified  R = Common risk identified  X = National risk identified  Y = Combined risk identified (national & common)  Z = No risk analysis performed  **CL147 = CountryCustomsSecurityAgreementArea**  AT = Austria  AX = ÅLAND ISLANDS  BE = Belgium  BG = Bulgaria  CH = Switzerland  etc …  **CL740 = RiskAreaCode**  100000 = Cash control  1000000 = Security  1001000 = Biochemical cargo  1002000 = Dual use                 etc …  The current wording of **C0715** is:    The wording of **C0813** is the following:    The Technical Rule **E1101** is:    The wording of **E1116** is:    The wording of **E1402** is the following:    **E1406** is:    The wording of **R0021** is:    The wording of **G0003** is:    It appears necessary to correct **G0821**:  **G0821**    **It should explain that:**  The last character of the D.I. <RISK ANALYSIS IDENTIFICATION-RISK ANALYSIS-RISK ANALYSIS RESULT.Code> shall be the value 'E',  where ‘E’ indicates “Common risk analysis result to be communicated to the Office(s) of Exit for Transit and/or the Office(s) of Transit and/or the Office of Destination (NCTS)”.  *Note: the G0821 is a guideline to remain flexible in NCTS in case of changes in the codes generated by the Risk Analysis and to avoid any rejection on the Common Domain for this reason.* |

**Section 3:** **Description of proposed solution**

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| The **DDNTA-5.14.1 - CSE-v51.6.0 (incl. Appendix Q2) and the CSE-v51.6.0** shall be updated as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~ ):  **G0821** will be updated as follows:  **From:**  ~~The last character of the D.I. <RISK ANALYSIS IDENTIFICATION-RISK ANALYSIS-RISK ANALYSIS RESULT.Code>~~ **~~must be one of the following values: 'D', 'E', 'Z'.~~**  **To:**  The last character of the D.I. <RISK ANALYSIS IDENTIFICATION-RISK ANALYSIS-RISK ANALYSIS RESULT.Code> shall be the value 'E' (where ‘E’ indicates “Common risk analysis result to be communicated to the Office(s) of Exit for Transit and/or the Office(s) of Transit and/or the Office of Destination (NCTS)”).  **Impact for NCTS- Data Mapping- v0.43 file:**  The Resolution for Upgrade of **.RISK ANALYSIS IDENTIFICATION.Code** will be updated as following:  IF (NCTS P4.RISK ANALYSIS.Risk Analysis result code is NULL) AND (NCTS P4 Security is NULL) AND (MESSAGE.RECIPIENT IS IN CL010) AND (MESSAGE.SENDER IS IN CL010), THEN NCTS P5. RISK ANALYSIS IDENTIFICATION.Code = 'N'  ELSE IF (NCTS P4.Security = '1') AND (NCTS P4.RISK ANALYSIS.Risk Analysis result code = ‘E’ ~~or ‘D’ or 'B'~~) AND (MESSAGE.RECIPIENT IS IN CL147) AND (MESSAGE.SENDER IS IN CL147) THEN NCTS P5. RISK ANALYSIS IDENTIFICATION.Code = 'R' ELSE IF (NCTS P4.Security = '1') AND (NCTS P4.RISK ANALYSIS.Risk Analysis result code = ‘Z’ or ‘B’ or ‘D’) AND (MESSAGE.RECIPIENT IS IN CL147) AND (MESSAGE.SENDER IS IN CL147) THEN NCTS P5. RISK ANALYSIS IDENTIFICATION.Code = 'Z' ELSE IF AND (NCTS P4 Security is ‘1’) AND (NCTS P4.RISK ANALYSIS is NOT PRESENT) AND (MESSAGE.RECIPIENT IS IN CL147) AND (MESSAGE.SENDER IS IN CL147) THEN NCTS P5. RISK ANALYSIS IDENTIFICATION.Code = 'N  The resolution for Downgrade will be remain as is:  Acceptable loss of information  **IMPACT ASSESSMENT:**  This RFC-Proposal impacts the logic of filling in the Data Group RISK ANALYSIS, during and after the Transitional Period.  No business continuity issue is expected.    **Risk of not adopting this change**: The MS remains confused about how to sill in the RISK ANALYSIS information in the Common Domain messages. Not blocking but a loss of efficiency.  **Risk of not implementing this change**: Some countries will send useless information over the Common Domain, creating confusion (and possibly problems) for the receiving MS aligned to RFC-List.36.  **Proposed** date of applicability in Operations (**T-Ops**):   Flexible timing (recommended 01.12.2022 or when starting NCTS-P5)  **Proposed** date of applicability in CT (**T-CT**):                      July 2022  **Expected** date of approval by ECCG (**T-CAB**):                  February 2022  **Impact on transition**: None (to be confirmed in DDNTA-5.15.0-v0.10-SfR)  **Impacted messages:**  **Common Domain Messages:** CD001C, CD003C, CD038C, CD050C, CD115C, CD160C, CD165C    **Impacted CIs:**  **• CSE-v51.6.0: Yes;**  **• DDNTA-5.14.1-v1.00 (Appendix Q2, PDFs, XLSX, XSD): Yes;**  **• DMP Package-5.6.0-SfA-v1.00 (incl. NCTS- Data Mapping- v0.43 file): Yes;**  **• ACS - v5.6.0 & ACS-Annex-NCTS: 5.6.0: No;**  **• CTP-5.8.0-v1.00: Yes;**  **• CTS-5.7.0-v1.00: Yes;**  • Functional Specifications (FSS/BPM): No;  • UCC IA/DA Annex B: No;  • DDCOM-20.3.0-v1.00: No;  • DDNTA-5.14.1-v1.00 (Main Document): No;  • CRP-v5.6-v1.00: No;  • TRP-5.8.1: No;  • ieCA 1.0.3.0: No;  • AES-P1 and NCTS-P5 Long-Lived “Legacy” (L3) Movements Study v1.40: No;  • CS/MIS2\_DATA: No;  • CS/RD2\_DATA: 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-5.14.1-v1.00 (Appendices)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Appendices generated by CSE + Appendix Q2, Q2\_R\_C, K** | |
| **DMP Package-v5.6.0** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **At least the list of R&C.** | |
| **NCTS\_TRP-5.8.1-v1.01** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of test data(s)** (to be confirmed)**.** | |
| **CTP-5.8.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of test data according to the updates of specifications.** (to be confirmed) | |
| **CTS-5.7.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Alignment of test data according to the updates of specifications.** (to be confirmed) | |

**Estimated impact on National Project**

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|  | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **This clarification for filling in the RISK ANALYSS shall be assessed by each NA.** | |

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| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by TAXUD/B3 | 03/02/2022 |  |
| v1.00 | SfA to NPMs | 07/02/2022 | *RFC-Proposal Emergency - Resolving issue identified by NA-BE.* |
| v1.10 | SfA with implementation details | 24/02/2022 | *SfA with implementation details* |