# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS-P6\_0278** (UCCNCTSP6-234) |
| **Related Incident ID** | **IM535773 / PM24544 / KE22536** |
| **RFC Initiator / Organization** | **DG TAXUD IT** |
| **CI** | **NCTS-P6 (DDNTA-v6.3.0-v1.00 – CSE-v60.4.4)** |
| **Type of Change** | **Standard  Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | | Removal of a Rule from the CD018D and CC044D to allow the same seal identifier to be reported multiple times due to discrepancies discovered during control at the Actual Customs Office of Destination. | |
| **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-P6 (DDNTA-6.3.0-v1.00 – CSE-v60.4.4): For control results, R0107 should be removed from Data Item ‘Identifier’** **under the Data Group ‘SEAL’ so that the *same* seal identifier could be declared more than once.** |
| Only in the messages CC044C (ex-CC044D) and CD018C (ex-CD018D), the Rule R0107 is removed to allow the reporting of the SAME ‘Seals’ found during control (e.g. reporting fake seals). |

**Section 2: Problem statement**

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| As per **DDNTA-6.3.0-v1.00 based on CSE-v60.4.4**, in messages **CD018D** and **CC044D**, the rule **R0107** is applied on the DI '/\*/TransportEquipment/Seal/identifier'. This Rule states that the DI 'SEAL.Identifier' is unique throughout the declaration. However, this Rule does not fit into the control message (CD018D) as it should be also feasible to report discrepancies for the DI 'SEAL.Identifier', in accordance with Guideline **G0360**. There is a conflict here, and as a result the Rule **R0107** should be removed to fix this misalignment. This would allow the same 'SEAL.Identifier' to be reported more than once, for example, in case the SEALS are found during control to be fake.  **Extract from message CD018D (ex-CD018C):**        **Extract from message CC044D (ex-CC044C):**    Therefore, the **R0107** should be removed from the **CC044C** and **CD018C** message. |

**Section 3: Description of proposed solution**

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| The **DDNTA-6.3.0-v1.0.0** (based on CSE-v60.4.4) should be updated as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~):   * In Appendices Q2, Q2 R/C, D and P, messages **CD018C** (ex-CD018D) and **CC044C** (ex-CC044D) should be updated as follows:  1. Removal of R0107; 2. Addition of B1943 in the CD018C as follows to manage properly the open movements and to avoid a big bang for all NAs (similar transitional measure can be applied in CC044C).   ---------SEAL  Sequence number R n..5 R0054  Identifier O an..20 G0360  ~~R0107~~  **B1943**  **B1943 Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDateP5P6> THEN /\*/TransportEquipment/Seal/identifier is unique in the whole declaration. **Functional Description:** N/A   * Validation values for new BRT B1943 in Appendix K:  |  |  | | --- | --- | | Validated by Sender | Validated by Recipient | | R | SR |   **IMPACT ASSESSMENT:**  This RFC-Proposal addresses a minor semantic modification for **both Opt-in and Opt-out NAs** in a Common Domain message to allow the reporting of discrepancies in the CC044C (ex-CC044D) and CD018C (ex-CD018D). It shall be applied to minimize the impact on the business continuity due to rejections.    **Proposed** date of applicability in Operations (**T-Ops**):   Start of P6 operations (at earliest 01.03.2025, at latest 01.09.2025)  **Proposed** date of applicability in CT (**T-CT**):                     Start of CT campaign (provisionally on 01.12.2024)  **Expected** date of approval by ECCG (**T-CAB**):                  Together with DDNTA-6.4.0  **Risk in case of non-implementation:**  In case of non-implementation, the Actual Office of Destination will be unable to report fake seals due to the restriction imposed by a Rule.  **Impacted messages:**   * CD018C (ex-CD018D) * CC044C (ex-CC044D)   **Impacted Rules, Conditions & BRTs etc.:**   * R0107 (deleted) * B1943 (new)   **Impacted CI Artefacts:**   * DDNTA-6.3.0-v1.00 (Main Document): No. * Functional Specifications NCTS-P6 (FSS/BPM): 7.10.0: No. * **CSE-v60.4.4: Yes**. * **DDNTA-6.3.0-v1.00 (Appendices ‘Q2’, ‘Q2 R/C, ‘D’, ‘P’, ‘K’):** **Yes.** * NCTS-P6 DMP-6.3.0-v1.00 Package: No. * CTP-6.2.0-v1.00: No. * **TRP-6.2.0-v1.01:** **Yes.** * DDCOM-21-3.0-v1.00: No. * ieCA/TED 2.0.0.0: No. * ICS2-CR-CTS-1.1.0-v1.01: No. * ICS2-CR-CRP-1.1.0-v1.00: No. * CS/MIS2\_DATA: No. * CS/RD2\_DATA: No. * UCC IA/DA Annex B: No. |

**Impact on CI artefacts**

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| **DDNTA-6.3.0-v1.00 (Appendices)** | Cosmetic  Low  Medium  High  Very High   |  | | --- | | **Introduction of B1943 and removal of the R0107 from CD018D and CC044D messages, as described in section 3.** | |
| **CSE-v60.4.4** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **Introduction of B1943 and removal of the R0107 from CD018D and CC044D messages, as described in section 3.** | |
| **TRP-v6.2.0-v1.01** | Cosmetic  Low  Medium  High  Very High  Short description   |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | | |  |  |  |  | | --- | --- | --- | --- | | **Updated TC (Partially passed or Failed if NA not aligned):** | **No** |  |  | | **Deleted Test Cases:** | **No** |  |  | | **New Test Cases:** | **No** |  | | | **Updated Drools:** | **Yes** |  | | | **Other:** |  | | | | |

**Estimated impact on National Project**

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| None Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | The RFC-Proposal concerns a small change at semantic level in CC044C and CD018D. The de-activation of a Rule is likely easy for most NA, but the impact is more significant because it also affects the External Domain, with a BRT applied to ensure a synchronised change.  **Impact for Opt-out NA: yes.**  **Impact for Opt-in NA: yes.**  **Impact on External Domain: yes.** | |

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| **Document History** | | |  |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFTDEV | 04/04/2024 | *Draft by SOFTDEV* |
| v0.11 | Commented draft | 16/06/2024 | *Comments by DG TAXUD IT (tds) – with TC.* |
| v0.20 | SfR to DG TAXUD IT | 26/06/2024 | *Version implementing DG TAXUD’s comments* |
| v1.00 | SfA to DG TAXUD IT | 15/07/2024 | *Final Version implementing DG TAXUD’s comments* |
| v1.01 | SfA-NPM\_IMPL | 18/12/2024 | *Watermark and Document history (status) updated for info \_ Part of RFC-List.42 \_ Included in DDNTA-6.4.0-v2.00.* |