# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS-P6\_0281** (UCCNCTSP6-231) |
| **Related Incident ID** | **IM492329** |
| **RFC Initiator / Organization** | **NA-CH** |
| **CI** | **DG TAXUD IT** |
| **Type of Change** | **Standard**  **Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | | Consider recent decisions for the D.G. ‘Place of Loading,’ where several NAs (mainly CTC) may choose whether or not to include it in the transit declaration. However, Opt-In NAs (EU MS or CTC) must always declare the D.G. ‘Place of Loading’ when a transit declaration is combined with ENS. | |
| **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): Update the wording of existing conditions applied on the D.G. ‘PLACE OF LOADING’** |
| In UCC DA Annex B, 'PLACE OF LOADING' is mandatory (except where it becomes optional for the pre-lodged declaration), whereas in the Common Transit Convention, it is marked with a value 'B' (which countries may choose to waive). Several conditions of DDNTA-6.3.0-v1.00, Appendix Q2 should be updated to ensure NCTS-P6 aligns with the legal framework and accommodates the specific national requirements for declaring it. |

**Section 2: Problem statement**

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| In UCC DA Annex B, D.G. ‘PLACE OF LOADING’ is *mandatory* but in case of a pre-lodged declaration it is *optional*.  Footnote [61]: “This data element is optional when the declaration is submitted prior to presentation of goods”.  Extracts from **UCC DA** **Annex B**:        Nevertheless, the D.G. ‘PLACE OF LOADING’ is optional based on the **Common Transit Convention** that applies for the CTC. Specifically, the following is indicated:    As recorded in the ticket **IM492329**, following the data harmonisation and the amendment of the Annex B, TAXUD.A1 performed the alignment of the Common Transit Convention (CTC) to the UCC Annex B and the following is decided:  **16 13 000 000 Place of loading** is mandatory, ‘A’ in the Annex B for columns D1-4 with the footnote [61] “This data element is optional when the declaration is submitted prior to presentation of goods”. In the decision of the Joint Committee of the CTC this data element is ‘B’, CTC countries can decide if they make it mandatory.  In **DDNTA-6.3.0-v1.00**, the following cases are present:  For the **Opt-In** and the **Opt-out** countries:  Extract from **CC015C (ex-CC015D)**:    Extract from **CC013D**:    Extract from **CC170D**:    With **C0409** and **C0412 defined as follows**:      Extract from **CCA15D**:    Extract from **CCA13D**:    Extract from **CC170D**:    Extract from **DDNTA-6.3.0-v1.00**, Appendix Q2 wording of **C0405:**    For the Common Domain messages:  Extract from **CD001C (ex-CD001D)**:    Extract from **DDNTA-6.3.0-v1.00**, Appendix Q2 wording of **C0414:**    The basic concept is to update the wording of the above conditions to maintain the same optionality of the D.G. "PLACE OF LOADING" (i.e., "Dependent") in the External and Common Domain messages and include the following in order of significance:   1. The D.G. ‘PLACE OF LOADING’ always becomes mandatory when a transit declaration is combined with ENS (i.e. Security is equal to ‘1-ENS’ or ‘3-ENS & EXS’ (this is applicable for the Opt-In NAs only); 2. The D.G. ‘PLACE OF LOADING’ becomes optional in case of pre-lodged declaration (this is applicable for the Opt-In and the Opt-Out NAs) 3. The D.G. ‘PLACE OF LOADING’ becomes either optional or even ‘waived’ for countries that belong to the new CL289 ([CountryPlaceOfLoadingNotRequired](https://netcompany-my.sharepoint.com/:w:/p/daniil/EdKIBEkb4VZCu3U9QUKBeF8Bzoe29e9ShCAREFJIWppV9A)) 4. The D.G. ‘PLACE OF LOADING’ becomes mandatory for countries that do not belong to the new CL289 (EU MS and CTC countries that decide to declare it). |

**Section 3: Description of proposed solution**

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| The **DDNTA-6.3.0-v1.0.0** (based on CSE-v60.4.4) will be updated as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~):  1.  In messages **CCA13D** DECLARATION AMENDMENT **(E\_DEC\_AMD)**, **CDA13D** DECLARATION AMENDMENT ENS **(C\_DEC\_AMD\_ENS), CCA15D** DECLARATION DATA **(E\_DEC\_DAT)** and **CDA15D** DECLARATION DATA ENS **(C\_DEC\_DAT\_ENS)**,the optionality of the D.G. **‘PLACE OF LOADING’** will NOT change:  ------PLACE OF LOADING 1x D C0405  However, the condition **C0405** will be updated as follows:  **C0405 Technical Description:**  IF /\*/TransitOperation/additionalDeclarationType = "D"  THEN /\*/Consignment/PlaceOfLoading = "O"  ~~ELSE~~  ~~IF the first two characters of the /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL010~~  ~~THEN /\*/Consignment/PlaceOfLoading = "R"~~  ELSE  ~~IF /\*/TransitOperation/security is in SET {1,3}~~  **IF /\*/TransitOperation/security is in SET {0,2} AND**  **the first two characters of /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL289**  THEN /\*/Consignment/PlaceOfLoading = "~~R~~O"  ELSE /\*/Consignment/PlaceOfLoading = "~~O~~**R**"  **Functional Description:**  IF <TRANSIT OPERATION.Additional declaration type> = "D"  THEN <CONSIGNMENT-PLACE OF LOADING> = "O"  ~~ELSE~~  ~~IF the country code (first two characters) of the <CUSTOMS OFFICE OF DEPARTURE.Reference~~  ~~number> is in SET CL010 (CountryCodesCommunity)~~  ~~THEN <CONSIGNMENT-PLACE OF LOADING> = "R"~~  ELSE  ~~IF <TRANSIT OPERATION.Security> is in SET {1,3}~~  **IF <TRANSIT OPERATION.Security> is in SET {0,2} AND**  **the first two characters of <CUSTOMS OFFICE OF DEPARTURE.Reference number> is in SET CL289 (CountryPlaceOfLoadingNotRequired)**  THEN <CONSIGNMENT-PLACE OF LOADING> = " ~~R~~O"  ELSE <CONSIGNMENT-PLACE OF LOADING> = "~~O~~**R**"  2.  In message **CCA29D** RELEASE FOR TRANSIT **(E\_REL\_TRA)**, the optionality of the D.G. **‘PLACE OF LOADING’** will NOT change:  ------PLACE OF LOADING 1x DC0408  However, the condition **C0408** will be updated as follows:  **C0408 Technical Description:**  ~~IF the first two characters of the /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL010~~  ~~THEN /\*/Consignment/PlaceOfLoading = "R"~~  ~~ELSE~~  ~~IF /\*/TransitOperation/security is in SET {1,3}~~  **IF /\*/TransitOperation/security is in SET {0,2} AND**  **the first two characters of /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL289**  THEN /\*/Consignment/PlaceOfLoading = " ~~R~~O"  ELSE /\*/Consignment/PlaceOfLoading = "~~O~~**R**"  **Functional Description:**  ~~IF the country code (first two characters) of the <CUSTOMS OFFICE OF DEPARTURE.Reference~~  ~~number> is in SET CL010 (CountryCodesCommunity)~~  ~~THEN <CONSIGNMENT-PLACE OF LOADING> = "R"~~  ~~ELSE~~  ~~IF <TRANSIT OPERATION.Security> is in SET {1,3}~~  ~~THEN <CONSIGNMENT-PLACE OF LOADING> = "R"~~  **IF <TRANSIT OPERATION.Security> is in SET {0,2} AND**  **the first two characters of <CUSTOMS OFFICE OF DEPARTURE.Reference number> is in SET CL289 (CountryPlaceOfLoadingNotRequired)**  **THEN <CONSIGNMENT-PLACE OF LOADING> = ''O''**  ELSE <CONSIGNMENT-PLACE OF LOADING> = "~~O~~**R**"  3.  In messages **CC015C** DECLARATION DATA **(E\_DEC\_DAT)** (ex-CC015D) and **CC013C** DECLARATION AMENDMENT **(E\_DEC\_AMD)** (ex- CC013D), the optionality of the D.G. **‘PLACE OF LOADING’** will NOT change:  ------PLACE OF LOADING 1x DC0409  However, the condition **C0409** will be updated as follows:  **C0409 Technical Description:**  IF /\*/TransitOperation/additionalDeclarationType = "D"  THEN /\*/Consignment/PlaceOfLoading = "O"  ~~ELSE~~  ~~IF the first two characters of the /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL010~~  ~~THEN /\*/Consignment/PlaceOfLoading = “R”~~  **ELSE**  **IF the first two characters of /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL289**  **THEN /\*/Consignment/PlaceOfLoading = ''O''**  ELSE /\*/Consignment/PlaceOfLoading = “~~O~~**R**"  **Functional Description:**  IF <TRANSIT OPERATION.Additional declaration type> = "D"  THEN <CONSIGNMENT.Place of loading> = "O"  ~~ELSE~~  ~~IF the country code (first two characters) of the <CUSTOMS OFFICE OF DEPARTURE.Reference~~  ~~number> is in SET CL010 (CountryCodesCommunity)~~  ~~THEN <CONSIGNMENT.Place of loading> = “R”~~  **ELSE**  **IF the first two characters of <CUSTOMS OFFICE OF DEPARTURE.Reference number> is in SET CL289 (CountryPlaceOfLoadingNotRequired)**  **THEN <CONSIGNMENT-PLACE OF LOADING> = ''O''**  ELSE <CONSIGNMENT.Place of loading> = “~~O~~**R**"  4.  In message **CC029C** RELEASE FOR TRANSIT **(E\_REL\_TRA)**, the optionality of the D.G. **‘PLACE OF LOADING’** will NOT change:  ------PLACE OF LOADING 1x D C0410  However, the condition **C0410** will be updated as follows:  **C0410 Technical Description:**  ~~IF the first two characters of the /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL010~~  ~~THEN /\*/Consignment/PlaceOfLoading = "R"~~  **IF the first two characters of /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL289**  **THEN /\*/Consignment/PlaceOfLoading = ''O''**  ELSE /\*/Consignment/PlaceOfLoading = "~~O~~**R**"  **Functional Description:**  ~~IF the country code (first two characters) of the <CUSTOMS OFFICE OF DEPARTURE.Reference~~  ~~number> is in SET CL010 (CountryCodesCommunity)~~  ~~THEN <CONSIGNMENT-PLACE OF LOADING> = "R"~~  **IF the first two characters of <CUSTOMS OFFICE OF DEPARTURE.Reference number> is in SET CL289 (CountryPlaceOfLoadingNotRequired)**  **THEN <CONSIGNMENT-PLACE OF LOADING> = ''O''**  ELSE <CONSIGNMENT-PLACE OF LOADING> = "~~O~~**R**"  5.  In message **CC170C** PRESENTATION NOTIFICATION FOR THE PRE-LODGED DECLARATION **(E\_PRE\_NOT)**, the optionality of the D.G. **‘PLACE OF LOADING’** will NOT change:  ------PLACE OF LOADING 1x D C0412  However, the condition **C0412** will be updated as follows:  **C0412 Technical Description:**  IF (/CC015C/Consignment/PlaceOfLoading is PRESENT OR /CCA15D/Consignment/PlaceOfLoading  is PRESENT OR /CC013C/Consignment/PlaceOfLoading is PRESENT OR  /CCA13D/Consignment/PlaceOfLoading is PRESENT)  THEN /CC170D/Consignment/PlaceOfLoading = "O"  ELSE  ~~IF the first two characters of the /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL010~~  ~~THEN /\*/Consignment/PlaceOfLoading = "R"~~  ~~ELSE~~  IF (/CCA15D/TransitOperation/security is in ~~SET {1,3}~~**SET {0,2}** OR /CCA13D/TransitOperation/security is in  ~~SET {1,3}~~**SET {0,2}**) **AND the first two characters of /\*/CustomsOfficeOfDeparture/referenceNumber is in SET CL289**  THEN /\*/Consignment/PlaceOfLoading = "~~R~~**O**"  ELSE /\*/Consignment/PlaceOfLoading = "~~O~~**R**"  **Functional Description:**  IF (<CC015C-CONSIGNMENT-PLACE OF LOADING> is PRESENT OR <CCA15D-CONSIGNMENTPLACE  OF LOADING> is PRESENT OR <CC013C-CONSIGNMENT-PLACE OF LOADING> is  PRESENT OR <CCA13D-CONSIGNMENT-PLACE OF LOADING> is PRESENT)  THEN <CC170D-CONSIGNMENT-PLACE OF LOADING> = "O"  ELSE  ~~IF the country code (first two characters) of the <CUSTOMS OFFICE OF DEPARTURE.Reference~~  ~~number> is in SET CL010 (CountryCodesCommunity)~~  ~~THEN <CONSIGNMENT-PLACE OF LOADING> = "R"~~  ~~ELSE~~  IF (<CCA15D-TRANSIT OPERATION.Security> is in ~~SET {1,3}~~**SET {0,2}** OR <CCA13D- TRANSIT  OPERATION.Security> is in ~~SET {1,3}~~**SET {0,2}) AND**  **the first two characters of <CUSTOMS OFFICE OF DEPARTURE.Reference number> is in SET CL289(CountryPlaceOfLoadingNotRequired)**  THEN <CONSIGNMENT-PLACE OF LOADING> = "~~R~~**O**"  ELSE <CONSIGNMENT-PLACE OF LOADING> = "~~O~~**R**"  6.  In the messages **CC017C** (ex-CC017D), **CD001C** (ex-CD001D), **CD003C** (ex-CD003D), **CD038C** (ex- CD038D), **CD050C** (ex-CD050D), **CD115C** (ex-CD115D), **CD160C** (ex-CD160D)and **CD165C** (ex-CD165D), the D.G. **‘PLACE OF LOADING’** will change as follows:  ------PLACE OF LOADING 1x D ~~C0414~~ **C0410**  C0414 and C0410 are in fact identical and there is no need to keep both conditions. C0414 will be replaced by C0410. C0414 will be completely deleted from CSE (and thus from Appendix Q2 and other Appendices).  **Appendix D** impact:  A new version will be recorded for all updated conditions.  **IMPACT ASSESSMENT:**  This RFC-Proposal concerns the optionality of ‘Place of loading’. It documents the alignment of NCTS-P6 with the legal basis.    **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 01.01.2025)  **Expected** date of approval by ECCG (**T-CAB**):                  Together with DDNTA-6.4.0    **Risk in case of non-implementation:**  Rejections of some Common Domain messages exchanged between desynchronised NTAs.  **Impacted messages:**   * **External Domain:** CC013C (ex-CC013D), CC015C (ex-CC015D), CC029C (ex-CC029D), CCA13D, CCA15D   and CCA29D   * **National Domain:** CC017C (ex-CD017D) * **Common Domain:** CDA13D, CDA15D, CD001C (ex-CD001D), CD003C (ex-CD003D), CD038C (ex-   CD038D), CD050C (ex-CD050D), CD115C (ex-CD115D), CD160C (ex-CD160D), CD165C (ex-CD165D)  **Impacted Rules/Conditions, Guidelines:**   * C0405, C0408, C0409, C0410, C0412, and C0414 (all conditions updated)   **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’, ‘D’): 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**  **& CSE-v60.4.1 (Appendices)** | Cosmetic  Low  Medium  High  Very High   |  | | --- | | **Appendices ‘Q2’, ‘D’, as described in section 3.** | |
| **TRP-6.1.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  |  |  |  | | --- | --- | --- | --- | | **Updated TC (Partially passed or Failed if NA not aligned):** | **None** |  | | | **Deleted Test Cases:** | **None** |  |  | | **New Test Cases:** | **None** |  | | | **Updated Drools:** | **Yes** | **For update of the conditions** | | | **Other:** |  | | | |

**Estimated impact on National Project**

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| Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | No Change of optionality for DG “PLACE OF LOADING” and minor impact for the re-wording of several conditions:  **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 | 28/03/2024 | *Draft by SOFTDEV* |
| v0.11 | Commented draft | 16/06/2024 | *Comments by DG TAXUD IT (tds) + some improvements without TC.* |
| v0.20 | SfR to DG TAXUD | 20/06/2024 | *Comments of DG TAXUD implemented* |
| v0.21 | Commented draft | 03/07/2024 | *Comments by DG TAXUD IT (tds)* |
| v1.00 | SfA to DG TAXUD | 15/07/2024 | *Final version implementing DG TAXUD’s comments* |
| v1.10 | SfA to DG TAXUD | 25/07/2024 | *Extra updates due to DDNTA 6.4.0-v1.00 implementation* |
| v1.11 | SfI to NAs | 30/07/2024 | Applied in DDNTA-6.4.0-v1.00 – Extra corrections applied by DG TAXUD before publication on CIRCABC. |
| v1.12 | SfA to DG TAXUD | 14/08/2024 | Minor correction applied by SOFTDEV. |
| v1.13 | 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.* |