# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS-P6\_0279** (UCCNCTSP6-233) |
| **Related Incident ID** | **IM689025 / KE24377** |
| **RFC Initiator / Organization** | **NA-DE** |
| **CI** | **NCTS-P6 (DDNTA-6.3.0-v1.00 – CSE-v60.4.4)** |
| **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-P6 (DDNTA-6.3.0-v1.00 – CSE-v60.4.4): Rewording of the R0448 to eliminate the conflict with C0240 and to avoid rejections in the Common Domain (in case of incident with no re-seal).** |
| **This change will be already in place in the NTA.P5, based on the KEKW#012 (see** <https://circabc.europa.eu/ui/group/74357351-7c61-4729-8f4b-cd92c213ba34/library/41695aa0-1d7d-4ba6-a116-d1447e32a817>).There should be no impact on the NTA.P6 if the same application is used as starting point for NCTS-P6.  In **DDNTA-6.3.0-v1.00, based on CSE-v60.4.4**, the wording of R0448 is updated to document (based on KEKW#012) the resolution of the conflict with C0240, in case of the Data Item ‘Code’ of Data Group ‘INCIDENT’ has the value ‘2’ (***Seals are broken or tampered*** *with in the course of a transport operation for reasons beyond the carrier's control*) and the Consignment Items are **not re-sealed** (following control performed by the Office of Incident Registration). |

**Section 2: Problem statement**

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| As per **DDNTA-6.3.0-v1.00**, based on **CSE-v60.4.4**, in case the existing seals of the movement have been removed or broken/tampered and registered in the system as an incident en-route with code ‘2’ (*Seals are broken or tampered with in the course of a transport operation for reasons beyond the carrier's control*) or ‘4’ (*Imminent danger necessitates immediate partial or total unloading of the sealed means of transport*), there is a conflict between **R0448** and **C0240**,in case no new seals are attached by the Office of Incident Registration as explained in the next paragraph.  The current seals could be taken off as a result of a control carried out by the Office of Incident Registration. Nonetheless, in light of the fact that all supporting documentation ensures the unquestionable identity of the Consignment Items, the Office of Incident Registration determines NOT to re-seal the means of transportation following the conclusion of control **in accordance with Art. 301 para. 5 UCC-IA**.  C0240 requests the existence of D.G. "TRANSPORT EQUIPMENT", under the DG “INCIDENT” in cases of incident with code ‘2’ or ‘4’ (in this case it would be an empty D.G).  **C0240** wording is the following**:**  **Extract from Appendix Q2 of** **DDNTA-6.3.0-v1.00:**    In contrast, **R0448** prevents the value "0" for the DI ‘NUMBER OF SEALS’ if there is no container identification number.  **R0448** wording is the following**:**  **Extract from Appendix Q2 of** **DDNTA-6.3.0-v1.00:**    Therefore, this Request for Change (RFC) addresses this issue to delete the second part of the **R0448** (about the value of “NUMBER OF SEALS” due to an Incident en-route).   * The value ‘0’ (zero) in the D.I. "**Number of seals**" should be permitted in case following control, the Office of Incident Registration **decides not to re-seal** the Consignment Items. |

**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~~):  The wording of **R0448** will be updated as follows:  **Technical Description:**  IF /\*/Consignment/TransportEquipment/containerIdentificationNumber is NOT PRESENT  THEN the value '0' (zero) is not valid for  /\*/Consignment/TransportEquipment/numberOfSeals;  ~~IF /\*/Consignment/Incident/TransportEquipment/containerIdentificationNumber is NOT PRESENT~~  ~~THEN the value '0' (zero) is not valid for /\*/Consignment/Incident/TransportEquipment/numberOfSeals~~  **Functional Description:**  IF <CONSIGNMENT-TRANSPORT EQUIPMENT.Container identification number> is NOT PRESENT  THEN the value '0' (zero) is not valid for <CONSIGNMENT-TRANSPORT  EQUIPMENT.Number of seals>;  ~~IF <CONSIGNMENT-INCIDENT-TRANSPORT EQUIPMENT.Container identification number> is NOT~~  ~~PRESENT~~  ~~THEN the value '0' (zero) is not valid for <CONSIGNMENT-INCIDENT-TRANSPORT~~  ~~EQUIPMENT.Number of seals>~~  And the following changes will be applied:  The R0448 will be **removed** from “MESSAGE / CONSIGNMENT / INCIDENT / TRANSPORT EQUIPMENT.Number of seals” in the following messages:    (those are renamed as CD003C, CD115C, CD165C, CD180C, CD181C, CC043C and CC182C).  The changes will be applied in **CSE-v60.4.4**, and the **DDNTA-6.3.0-v1.00** Appendices K, P, Q2.  **IMPACT ASSESSMENT:**  This RFC concerns changes about how to deal with the ‘Seals’ in case of an incident and is applicable to both **Opt-In and Opt-Out NAs**. It shall be applied by the NA to minimize the impact on the business continuity due to rejections.  **Proposed** date of applicability in Operations (**T-Ops**):  National start of NCTS-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**):                 **Emergency correction applied in NCTS-P5 via NCTS\_KEKW\_#012**  **Risk in case of non-implementation:**  In case of non-implementation, movements could be blocked due to messages rejections due to a **conflict between a rule and a condition.**  **Impacted messages:**   * External Domain Messages: CC043C, and CC182C. * Common Domain Messages: CD003C, CD115C, CD165C, CD180C, and CD181C.   **Impacted Rules/Conditions, Guidelines:**   * R0448   **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 ‘D’, ‘K’, ‘Q2’, ‘P’):** **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-v60.4.4 (Appendices ‘D’, ‘K’, ‘P’ and ‘Q2)’** | Cosmetic  Low  Medium  High  Very High   |  | | --- | | **Appendices ‘D’, ‘K’, ‘P ’and ‘Q2’ as described in section 3.** | |
| **TRP-6.2.0-v1.01** | Cosmetic  Low  Medium  High  Very High  Short description   |  |  |  |  | | --- | --- | --- | --- | | **Updated TC (Partially passed or Failed if NA not aligned):** | **None** | **Corrections already applied in TRP-5.13.11 and TRP-5.14.3** | | | **Deleted Test Cases:** | **None** |  |  | | **New Test Cases:** | **Yes** |  | | | **Updated Drools:** | **Yes** | **Update of R0448** | | | **Other:** |  | | | |

**Estimated impact on National Project**

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| None  Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | This change will be already in place in the NTA.P5, based on the KEKW#012 (see [*https://circabc.europa.eu/ui/group/74357351-7c61-4729-8f4b-cd92c213ba34/library/41695aa0-1d7d-4ba6-a116-d1447e32a817*](https://circabc.europa.eu/ui/group/74357351-7c61-4729-8f4b-cd92c213ba34/library/41695aa0-1d7d-4ba6-a116-d1447e32a817)). There should be no impact on the NTA.P6 if the NTA.P5 application was fixed and is used as starting point for NCTS-P6. | |

| **Document History** | | | |
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| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFTDEV | 04/04/2024 | *Draft by SOFTDEV* |
| v0.11 | Commented draft | 09/04/2024 | *TC & comment by DG TAXUD IT (tds)* |
| v0.12 | Draft by SOFTDEV | 10/04/2024 | Implementation of comments made by DG TAXUD |
| v0.13 | Updated draft | 16/06/2024 | *Optimisation of text by DG TAXUD IT (tds).* |
| v0.20 | SfR to DG TAXUD | 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.* |