# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_NCTS-P6\_0293** (UCCNCTSP6-214) |
| **Related Incident ID** | **N/A** |
| **RFC Initiator / Organization** | **DG TAXUD IT** |
| **CI** | **NCTS-P6 (DDNTA-6.3.0-v1.00 – CSE-v60.4.4)** |
| **Type of Change** | **Standard  Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | | DDNTA Appendices, CSE and Data Mapping File (DMP) modifications needed due to the change of the suffix from ‘D’ to ‘C’ in NCTS-P6 **External Domain** messages. | |
| **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): Documenting the updates on External Domain and National Domain messages for Opt-In & Opt-Out NAs to support the suffix change from ‘D’ to ‘C’.** |
| This RFC-Proposal is focusing on the External Domain and National Domain messages. Other RFC-Proposal is focusing on Common Domain messages (See **RFC\_NCTS-P6\_0290**).  The section 3 includes:   1. Changes needed to be performed in ‘C’ messages by NCTS-P5 NAs to migrate to NCTS-P6 2. Changes needed to be performed in ‘D’ messages as defined in DDNTA-6.3.0-v1.00   So, the two faces of the same coin are defined, to provide maximum clarity on this change. |

**Section 2: Problem statement**

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| Based on the experience with the migration from NCTS-P4 to NCTS-P5, DG TAXUD has highlighted key risks and challenges for the migration to NCTS-P6. Therefore, to facilitate the transition from NCTS-P5 to NCTS-P6, most of the NCTS-P6 messages should continue to use the suffix ‘C’. This Request for Change (RFC) should offer traceability to the NCTS-P5 National Administrations, between DDNTA-5.15.2-v2.00 (used in operations before and after the TPendDate) and DDNTA-6.4.0 (under development for NCTS-P6).  Please refer to the **RFC\_NCTS-P6\_0295** for further information regarding the justification of changes. |

**Section 3: Description of proposed solution**

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| In this Section, addition of **text is highlighted in yellow** and removal of ~~text with strikethrough~~.   1. **Changes needed to be performed in ‘C’ messages by NCTS-P5 NAs to migrate to NCTS-P6**   All NAs (Opt-in and Opt-out) will use **Common Domain** messages with the suffix ‘C’ instead of ‘D’.  An NCTS-P5 NA can also reuse the existing XSDs from **DDNTA-5.15.2-v2.00** for the External Domain / National Domain messages, depending on their status in joining NCTS-P6. This makes the messages NCTS-P6 ready. Therefore, all NCTS-P5 NAs should follow the actions described below for implementing the External/National Domain messages.  **IMPORTANT NOTES:**   * For the Opt-Out NAs, it is **not required** to take **immediate** action on messages CC015C, CC013C and CC029C (actions must be applied **at the latest on** 01.09.2025, if applicable); * Both Opt-In & Opt-Out NAs must take action to be applied by bat a later stage (but before 01.09.2025) on messages CC007C, CC017C and CC170C.   The transitional measures defined for the External/National Domain messages CC015C, CC013C, CC029C, CC007C, CC017C and CC170C have been created to ensure the business continuity and to facilitate the conversion of messages exchanged between Traders being under NCTS-P4 and National Transit Applications (NTAs) being under NCTS-P5. After the end of NCTS-P4/NCTS-P5 TP, the transitional measures (BRT-1s and TRTs) are **not applicable** anymore **for new transit movements** and can thus be removed from those messages (without having any impact to the structure of these messages). But since BRT-2s are enabled for new transit movements (i.e. those created after the end of the NCTS-P4/NCTS-P5 TP), a few minor **adjustments to the structure of these messages are required before the BRT-2s** **are removed**.    Therefore, an NCTS-P5 NA should follow the below actions for removing all transitional measures from the abovementioned IEs and thus being able to re-use these messages (with the suffix ‘C’) when communicating with their Traders in the External Domain.  NOTE: The final structure of the CC015C, CC013C, CC029C, CC007C, CC017C and CC170C messages can be found in the excel file at the end of this sub-paragraph A, in which all proposed changes are outlined.  **1/ Change to be applied on the Technical Header of the External Domain messages (CC015C and CC013C):**  In both messages (CC015C and CC013C), B1833 will be removed from the D.I. “Correlation identifier”:   |  |  |  |  | | --- | --- | --- | --- | | MESSAGE |  |  |  | | (…) |  |  |  | | Correlation identifier | D | an..35 | ~~B1833~~  C0511  R0008 |   **B1833**  **Technical Description:**  IF <Decisive Date> is LESS than or EQUAL to <TPendDate>  THEN C0511 attached to /\*/correlationIdentifier shall be disabled  AND /\*/correlationIdentifier = "O"  **2/ Removal or rewording of Guidelines referring to Transition in the External Domain messages:**  **All the following transitional guidelines can be removed without any impact on XSDs as follows:**   * B1000 is removed from CC015C, and CC013C; * B1016 is removed from CC015C, and CC013C; * B1091 is removed from CC015C, CC013C and CC170CC   **All of the following Guidelines will still be applicable to the relevant messages after being slightly reworded to refer to the NCTS-P4/NCTS-P5 Transitional Period as follows:**   * G0001 (applied on CC013C, CC015C, CC017C, CC029C messages) shall be   reworded as follows:  G0001 Technical Description:  N/A  Functional Description:  If at least one <CONSIGNMENT-HOUSE CONSIGNMENT-ADDITIONAL INFORMATION.Code> is EQUAL to ’30600’ in the declaration, then for the specific <CONSIGNMENT-HOUSE CONSIGNMENT> the Data Group CONSIGNEE shall not be used AND <CONSIGNMENTCONSIGNEE> shall not be used. For the rest of the repetitions of <CONSIGNMENT-HOUSE CONSIGNMENT> the specific IF statement (“If at least one <CONSIGNMENT-HOUSE CONSIGNMENT-ADDITIONAL INFORMATION.Code> is EQUAL to ’30600’”) shall be re-validated.  During the **NCTS-P4/NCTS-P5** Transitional Period same approach shall be followed for the <CONSIGNMENT-HOUSE CONSIGNMENT-CONSIGNMENT ITEM-ADDITIONAL INFORMATION.Code>.   * G0789 (applied on CC013C, CC015C, and CC170C messages) shall be reworded as follows:   G0789 Technical Description:  N/A  Functional Description:  The ’Customs office at border reference number’ identifies the border crossing point (BCP) where the ‘Active border transport means’ will be present. It is either the ‘Reference number’ of one of the ‘CUSTOMS OFFICE OF TRANSIT (DECLARED)’ or the ‘Reference number’ of one of the ‘CUSTOMS OFFICE OF EXIT FOR TRANSIT (DECLARED)’ or the ‘Reference number’ of the ‘CUSTOMS OFFICE OF DESTINATION (DECLARED)’. By using this Data Item, it is possible (after the end of the **NCTS-P4/NCTS-P5** Transitional Period) to identify which transport means will be present at which border crossing point, in case of multiple BCP and multiple changes of active transport means.   * G0989 (applied on CC043C and CC044C messages) shall be reworded as follows:   G0989 Technical Description:  N/A  Functional Description:  This Data Group is inserted as transitional but without any transitional measure applied to it. The Data Group is present in this message, in order to ensure consistency of the structure across the lifecycle of the movements during the **NCTS-P4/NCTS-P5** Transitional Period. This Guideline aims to draw the attention on the potential need for Technical Rules for Transition (Exxxx) or Business Rules for Transition (B1xxx and B2xxx) as defined in the section “1. Introduction” of DDNTA APPENDIX Q2.   * G0991 (applied on CC013C, CC015C, CC017C, CC029C, and CC043C) shall be reworded as follows:   G0991 Technical Description:  N/A  Functional Description:  During the **NCTS-P4/NCTS-P5** Transitional Period, the value ‘N830’ (Goods declaration for exportation) is defined as valid in codelist CL214 (PreviousDocumentType). From the end date of the **NCTS-P4/NCTS-P5** Transitional Period, the value ‘N830’ will become valid ONLY in the CL228 (PreviousDocumentExportType) to indicate the “Export  Followed by Transit” procedure in the Data Group <CONSIGNMENT-HOUSE CONSIGNMENT>.  NOTE: The Guideline G0010 applied on the CC056C, CC057C and CC906C and effectively to the ‘D’ version of these messages (i.e. CC056D, CC057D) will remain unaffected with the same wording.  **See attached XLS file at the end of this sub-paragraph A for more details on those Transitional Guidelines according to which Data Element/Group they are applied.**  **3/ Removal of Technical Rules for Transition (TRTs) from the External Domain messages:**  The TRTs (E1xxx) apply constraints to the cardinality or the optionality or the format of a Data Element/Group during the NCTS-P4/NCTS-P5 TP, but they are no longer applicable after the end of the NCTS-P4/NCTS-P5 TP. Therefore, the TRTs can be removed without changing the structure of the External Domain messages.  NOTE: By removing a TRT affecting the optionality of a Data Element/Group, the new optionality shall be automatically defined by the existing structure of the message (i.e. XSD) or by any existing Condition(s) already attached to this Data Element/Group.  **All the following TRTs (E1xxx) can be removed without any impact on XSDs as follows:**  **The TRTs to be removed from the CC015C and CC013C messages are the following:**   * E1102, E1103, E1104, E1105, E1107, E1109, E1111, E1114, E1117, E1118, E1301, E1401, E1406, E1407   **The TRT to be removed from the CC029C message is the following:**   * E1301   **See attached XLS file at the end of this sub-paragraph A for more details on the removal of those TRTs according to which Data Element/Group they are applied.**  **4/ Removal of Business Rules for Transition (BRT-1s) from the External Domain messages:**  The BRT-1s (**B1xxx)** apply a constraint on the transit declaration message submitted by the Holder of the Transit Procedure (CC015C) with an acceptance date being **before the end of the NCTS-P4/NCTS-P5 TP (i.e. as defined by the TPendDate)**.  A **BRT-1** changes the **cardinality** or the **optionality** or the **format** of the Data Element/Group, but it **does \*not\* affect the XSD files.** The optionality of the Data Element/Group will continue to remain dependent based on one (1) or more other Condition(s) already attached to it, or it continues to remain optional (i.e. it shall not be changed to ‘Required’ or ‘Not used’).  **The BRT-1s to be removed from the CC015C/CC013C messages are the following:**   * B1804, B1805, B1806, B1811, B1813, B1814, B1815, B1819, B1820, B1821, B1822, B1823, B1831, B1832, B1833, B1834, B1838, B1848, B1850, B1858, B1860, B1862, B1875, B1877, B1889, B1890, B1891, B1892, B1893, B1895, B1896, B1897, B1898, B1904, B1919, B1922, B1964, B1965, and B1966.   **The BRT-1s to be removed from the CC017C & CC029C messages are the following:**   * B1904, and B1966.   **5/ Removal of Business Rule for Transition (BRT2) from External Domain messages:**  The BRT-2s (**B2xxx)** apply a constraint on the transit declaration message submitted by the Holder of the Transit Procedure (CC015C) with an acceptance date being **after the end of the NCTS-P4/NCTS-P5 Transitional Period (as defined by the TPendDate)**. Specifically, a **BRT-2** changes the **cardinality** or the **optionality** or the **format** of the data element AND it **affects the structure of the messages (i.e. XSD files).** Based on the above, a BRT-2 can be removed ONLY AFTER applying the structural updates on these messages.  **The BRT-2s to be removed from the CC015C and CC013C messages are the following:**   * B2101, and B2400,   **The BRT-2 to be removed from the CC007C message is the following:**   * B2400.   **See attached XLS file at the end of this sub-paragraph A for more details on the updates concerning BRT-2s (and eventually their removal) according to which Data Element/Group they are applied.**  **6/ Change of CS/RD2 DATA (CONF & PROD) for codelists used by External Domain messages:**  The value ‘N830’ from the codelist CL214 (PreviousDocumentType) in CS/RD2 shall be valid until the end of the NCTS-P4/NCTS-P5 Transitional Period.  **IMPORTANT NOTES:**   * The following table depicts the External Domain messages (originating from NCTS-P5), which are to be distinguished for the Opt-In and Opt-Out NAs based on their suffix ('C' versus 'D'). They can be utilized in the manner described below:  |  |  |  |  | | --- | --- | --- | --- | | **Messages to be used by Opt-Out NAs** | | **Messages to be used by Opt-in NAs** | | | CC004C | AMENDMENT ACCEPTANCE | CC004D | AMENDMENT ACCEPTANCE | | CC009C | INVALIDATION DECISION | CC009D | INVALIDATION DECISION | | CC013C | DECLARATION AMENDMENT | CCA13D | DECLARATION AMENDMENT | | CC015C | DECLARATION DATA | CCA15D | DECLARATION DATA | | CC028C | MRN ALLOCATED | CC028D | MRN ALLOCATED | | CC029C | RELEASE FOR TRANSIT | CCA29D | RELEASE FOR TRANSIT | | CC056C | REJECTION FROM OFFICE OF DEPARTURE | CC056D | REJECTION FROM OFFICE OF DEPARTURE | | CC060C | CONTROL DECISION NOTIFICATION | CC060D | CONTROL DECISION NOTIFICATION | | CC928C | POSITIVE ACKNOWLEDGE | CC928D | POSITIVE ACKNOWLEDGE |  * All other External Domain messages originating from NCTS-P5 will keep the 'C' suffix and will be used by both Opt-In and Opt-Out NAs.   **Impact on the DDNTA Appendix X:**  In Appendix X, the following files will be modified:  **Action**: All the specified Data Elements stated in the wording of B2400 should be removed from the message structure. Additionally, this update has impact on the XSD files, as depicted below.  **Example of removing the data group from XSD file ‘ctypes’:**  ~~<xs:element name="TransportDocument" minOccurs="0" maxOccurs="99" type="TransportDocumentType02">~~  ~~<xs:annotation>~~  ~~<xs:documentation>~~  ~~<description value="TRANSPORT DOCUMENT" />~~  ~~<optionality value="O" />~~  ~~</xs:documentation>~~  ~~</xs:annotation>~~  ~~</xs:element>~~  **Action**: All the specified Data Elements stated in the wording of B2101 should be removed from the message structure. Additionally, this update has impact on the XSD files, as depicted below.  **Example of changing the optionality of a data group in XSD file ‘ctypes’:**  <xs:element name="PlaceOfLoading" minOccurs="0" type="PlaceOfLoadingType04">  <xs:annotation>  <xs:documentation>  <description value="PLACE OF LOADING" />  <optionality value="~~O~~**R**" />  </xs:documentation>  </xs:annotation>  </xs:element>  A summary of all the changes is included below in an excel file for the messages CC007C, CC013C, CC015C, CC017C, CC028C, CC029C, and CC170C.  NOTE: The attached excel, that follows, depicts the **AS-IS** message (i.e. based on the DDNTA-5.15.2-v2.00) with strikethrough changes. There is also a column named “Notes”, which depicts the type of change and the de-activation/activation of the respective R/Cs (where applicable).     1. **Changes needed to be performed in ‘D’ messages as defined in DDNTA-6.3.0-v1.00**   The **DDNTA-6.3.0-v1.00** and the **CSE-v60.4.4** shall be updated as follows (addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~):  The CC007D, CC015D, CC013D, CC017D, CC028D, CC029D, and CC170D messages shall have:   * their suffix changed from ‘D’ to ‘C’; * their NCTS-P5/NCTS-P6 BRT-1s removed from the message structure; * their rules/conditions/guidelines/sequencing rules, added in NCTS-P6, removed.   **See attached XLS file at the end of this sub-paragraph B for the finalised structure of the CC007D, CC015D, CC013D, CC017D, CC028D, CC029D, and CC170D messages.**  **The most notable changes are the following:**   * Updates to DDNTA-6.3.0-v1.00 Appendices regarding the suffix change from ‘D’ to ‘C’   **Appendix A** shall be **manually** updated to change the suffix of IE007, IE015, IE013, IE017, IE028, IE029, IE170, ΙΕ056 from CDXXX~~D~~ to CDXXX**C** as follows:     |  |  |  |  | | --- | --- | --- | --- | | **IE Number** | **NCTS-P6 IE Version** | **NCTS-P6 IE Name** | **NCTS-P6 IE Reference** | | IE007 | ~~CC007D~~ **CC007C** | ARRIVAL NOTIFICATION | (E\_ARR\_NOT) | | IE015 | ~~CC015D~~ **CC015C** | DECLARATION DATA | (E\_DEC\_DAT) | | IE013 | ~~CC013D~~ **CC013C** | DECLARATION AMENDMENT | (E\_DEC\_AMD) | | IE017 | ~~CC017D~~ **CC017C** | DEPARTURE CONTROL RESULTS | (N\_DEP\_CON) | | IE028 | ~~CC028D~~ **CC028C** | MRN ALLOCATED | (E\_MRN\_ALL) | | IE029 | ~~CC029D~~ **CC029C** | RELEASE FOR TRANSIT | (E\_REL\_TRA) | | IE170 | ~~CC170D~~ **CC170C** | PRESENTATION NOTIFICATION FOR THE  PRE-LODGED DECLARATION | (E\_PRE\_NOT) | | ΙΕ056 | ~~CC056D~~ **CC056C** | REJECTION FROM OFFICE OF  DEPARTURE | (E\_DEP\_REJ) |     **Appendices K, P, Q2** shall be updated, **automatically through the changes performed in CSE**, similarly to Appendix A, meaning that the suffix should be changed in messages IE007, IE015, IE013, IE017, IE028, IE029, IE170, ΙΕ056 from CCXXX~~D~~ to CCXXX**C.** For instance:  **Extract from Appendix K, message IE015:**    **Extract from Appendix Q2, message IE015:**     * Alignment of NCTS-P5 & NCTS-P6 message structure * CC170D should be aligned with CC170C of NCTS-P5, therefore: * Condition C0604 should be removed from D.I “Mode of Transport at the border” at Consignment level; * New condition C0600 should attached at D.I “Mode of Transport at the border” at Consignment level.   **Extract from CC170D:**  (…)  ---CONSIGNMENT  Container indicator D n1 CL027 C0824  G0332  Inland mode of transport D n1 CL218 C0170  Mode of transport at the border D n1 CL218 ~~C0604~~ **C0600**  G0020  G0115  The wording of C0600 should be the following:  **C0600**  **Technical Description:**  **IF /CC015C/TransitOperation/security is in SET {1,2,3}**  **THEN /CC170C/Consignment/modeOfTransportAtTheBorder = "R"**  **ELSE /CC170C/Consignment/modeOfTransportAtTheBorder = "O"**  **Functional Description:**  **IF <CC015C-TRANSIT OPERATION.Security> is in SET {1,2,3}**  **THEN <CC170C-CONSIGNMENT.Mode of transport at the border> = "R"**  **ELSE <CC170C-CONSIGNMENT.Mode of transport at the border> = "O"**   * Messages CC015D, CC013D, CC029D should be aligned with their NCTS-P5 counterparts, therefore: * BRT **B1939** and rule **R0041** should be removed from **D.I “Security” at Header level** from all three (3) messages. * Guideline **G0100** should be removed from **D.I “Communication language at departure” at Header level** from all three (3) messages. * Rule **R0100** should be attached to **D.I “Communication language at departure” at Header level** from all three (3) messages.   **Extract from CC015D, CC013D, CC029D**   |  |  |  |  |  | | --- | --- | --- | --- | --- | | --TRANSIT OPERATION |  |  |  |  | | (…) |  |  |  |  | | Security | R | n1 | CL217 | ~~B1939~~  ~~R0041~~ | | (…) |  |  |  |  | | Communication language at departure | O | a2 | CL192 | ~~G0100~~  **R0100** |   The above-mentioned changes performed in messages CC007D, CC015D, CC013D, CC017D, CC028D, CC029D, CC170D, CC056D and are outlined in the below excel file.    **IMPACT ASSESSMENT:**  This RFC proposal concerns changes related to the suffix of messages (from ‘D’ to ‘C’) in External/National Domain messages for **the Opt-In and Opt-Out NAs**. It is proposed to be implemented before the start of the NCTS-P6 operations (T-Ops) so that NAs properly join NCTS-P6.  **Proposed** date of applicability in Operations (**T-Ops**):  Before the country effectively starts its NCTS-P6 operations (at earliest 01.02.2025, at latest 01.09.2025)  **Proposed** date of applicability in CT (**T-CT**):                     Start of CT campaign (provisionally on 01.07.2025)  **Expected** date of approval by ECCG (**T-CAB**):                  Together with DDNTA-6.4.0    **Risk in case of non-implementation:**  Possible message rejections and blocked movements in case of not implementing the proposed changes.  **Impacted messages:**   * CC007D, CC015D, CC013D, CC017D, CC028D, CC029D, CC170D   **Impacted Rules, Conditions & BRTs etc.:**   * All BRT-1s (B1xxx), TRTs (Exxxx), BRT-2s (B2xxx) of NCTS-P5; * All BRT-1s (B1xxx) of NCTS-P6; * Several conditions, rules, and guidelines.   **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 ‘A’, ‘D’, ‘K’,’ P’, ‘Q2’, ‘X’):** **Yes.** * NCTS-P6 DMP-6.3.0-v1.00 Package: No. * CTP-6.2.0-v1.00:No. * TRP-6.2.0-v1.01:No. * 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 ‘A’, ‘D’, ‘K’,’ P’, ‘Q2’, ‘X’)** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **The Appendices ‘A’, ‘D’, ‘K’,’ P’, ‘Q2’, ‘X’ for the External Domain Messages shall be updated as described in section 3.** | |
| **CSE-v60.4.4** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | **External Domain Messages shall be updated as described in section 3.** | |

**Estimated impact on National Project**

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| None Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Positive impact, reducing the effort to develop the NTA.P6 applications.  Impact on External Domain messages. Common domain messages to be changed, along with several R/C.  To be further assessed by each National Project Team. | |

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| **Document History** | | | |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFTDEV | 22/03/2024 | *Draft by SOFTDEV* |
| v0.11 | Draft by SOFTDEV | 29/04/2024 | *Draft by SOFTDEV* |
| v0.20 | SfR to DG TAXUD | 26/06/2024 | *Version implementing DG TAXUD’s comments* |
| v1.00 | SfA to DG TAXUD | 15/07/2024 | *Final version implementing DG TAXUD’s comments* |
| v1.01 | SfA to DG TAXUD | 14/08/2024 | *Minor corrections applied* |
| v1.02 | 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.* |