# Impact Analysis Report / RFC Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_AES\_0145 (JIRA: UCCAES-2002)** |
| **Related Incident ID** | **IM580628** |
| **RFC Initiator / Organization** | **NA-ES & NA-DE** |
| **CI** | **AES-P1 (DDNXA-5.15.1-v1.00 - CSE-v51.8.2)** |
| **Type of Change** | **Standard** **Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | | Codelist CL294 shall be replaced by codelist CL194 in messages CC513C, CC515C, CC529C, CC536C, CD501C, CD533C, CD540C, CD543C in order to enable the declaration of EIN customs offices for the case of EFBT. | |
| **RFC Source** | |  |  | | --- | --- | | **Legal & Policy Change**  **Organisational Changes** | **Business Change**  **IT Change** | |
| **Review by Business User recommended?** | **Yes No** |

***Change Summary***

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| **AES-P1 (DDNXA-5.15.1-v1.00 - CSE-v51.8.2): CL194 to replace CL294 in the following ED and CD IEs: CC513C, CC515C, CC529C, CC536C, CD501C, CD533C, CD540C, CD543C** |
| CL294 shall be replaced by CL194 in D.I. ‘CUSTOMS OFFICE OF EXIT (DECLARED).Reference Number’ in:   * External Domain IEs: CC513C, CC515C, CC529C, CC536C; * Common Domains IEs: CD501C, CD533C, CD540C, CD543C   in order to declare EIN Customs Offices of Exit in export followed by transit (EFBT) cases. |

**Section 2: Problem Statement**

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| In case the Declarant/Representative knows from the beginning of the export declaration lodgement that the export will be followed by a transit procedure in an Office of Exit that has ‘EIN’ role only (no ‘EXT’ role), then he cannot select this specific Customs Office of Exit (Declared) (OoExtD) in the declaration.  At this point, the specifications allow only Customs Office of Exit (Declared) with role ‘EXT’ to be registered, thus, this represents a constraint for the Declarant/Representative.  The replacement of the CL294 (that includes Customs Offices of Exit with the ‘EXT’ role only) with CL194 (that includes Customs Offices of Exit with both ‘EIN’ or ‘EXT’ roles) in the related export declaration messages CC513C, CC515C, CC529C, CC536C, CD501C, CD533C, CD540C, CD543C, will mitigate the above constraint.  **Impacted IEs**: CC513C, CC515C, CC529C, CC536C, CD501C, CD533C, CD540C, CD543C  **Impacted R/C/G/T/TRT/BRT/CL:** CL294, CL194  **Impacted CIs Artefacts**:   * **CSE-v51.8.2: Yes** * **DDNΧA-5.15.1-v1.00 (Appendix Q2\_R\_C, PDFs): Yes** * **DMP Package-5.8.0-v1.00 (incl. update of file Rules and Conditions\_v0.53): Yes** * **TRP-5.13.0- v1.00: Yes** * DDNXA-5.15.1-v1.00 (Main Document): No * CTP-5.13.0-v1.00: No * CRP 5.7.7.1-v1.0: No * CTS-5.7.6-v1.00: No * Functional Specifications (FSS/BPM): No * UCC IA/DA Annex B: No * ACS-5.8.0-v1.00 & ACS-Annex-AES/NCTS: 5.8.0-v1.00: No * AES-P1 and NCTS-P5 Long-Lived “Legacy” (L3) Movements Study v1.50: No * ieCA 1.0.4.1: No * CS/RD2\_DATA: No * CS/MIS2\_DATA: No |

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

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| The **DDNXA-5.15.1-v1.00 (incl. Appendix Q2) and the CSE-v51.8.2** shall be corrected as follows (addition of **text highlighted in yellow,** removal of ~~text with strikethrough~~).   1. Codelist CL294 shall be replaced by codelist CL194 on Data Item ‘CUSTOMS OFFICE OF EXIT(DECLARED).Reference Number’ in messages **CC513C, CC515C, CC529C, CC536C, CD501C, CD533C, CD540C, CD543C**   …  ---CUSTOMS OFFICE OF EXIT (DECLARED) 1x R  Reference Number R an8 ~~CL294~~ CL194  …  **IMPACT ASSESSMENT:**  The RfC proposal has semantic impact on the External Domain, National Domain and the Common Domain.  This RfC proposal is recommended to be applied when a country is entering production of AES-P1, latest by 11.02.2025. For countries that are already in production, it is recommended to be applied, at least for the CD messages, directly (as soon as possible) while for the ED/ND messages, depending the country specificity it is recommended to be applied as soon as possible but not later than 11.02.2025.  **Impact on External Domain – Low**  The External Domains messages CC513C, CC515C, CC529C are impacted with this RfC proposal.  **Impact on National Domain – Low**  The National Domain message CC536C is impacted with this RfC proposal.  **Changes at semantic level**  This RfC proposal introduces semantic changes in the External Domain messages CC513C, CC515C, CC529C, in the National Domain message CC536C and in the Common Domain messages CD501C, CD533C, CD540C, CD543C. The changes at the semantic level namely concern the replacement of CL294 in the D.I. ‘CUSTOMS OFFICE OF EXIT (DECLARED).Reference Number’ with CL194.  It is considered that the proposed change has impact on business continuity and therefore shall be deployed in CD as soon as possible (for the countries that are already in AES operations) or at the moment the NA is entering in AES operation (for the NAs that will enter after the RFC approval date). More specifically, for the change concerning the replacement of CL294 with CL194 for the Common Domain:   * In case the sender of CD501C, CD533C, CD540C, CD543C is aligned with the proposed change (validation of the OoExtD against CL194) while the receiver is not, then CL294 will be used by the receiver for the validation of the OoExtD, and the message might be rejected due to the failure of the validation of validation against CL294 in case the OoExtD role is ‘EIN’. This possible rejection of CD501C will not block the operations as the movement, once it arrives at the OoExt, will get, through the CD502C/CD503C the necessary movement information including the right role for OoExtD. For the cases of CCE CD messages the receiver of those CCE messages must be aligned to the validation of the OoExtD against CL194. * In case the sender of CD501C, CD533C, CD540C, CD543C is not aligned with the proposed changes and the receiver is aligned with the proposed changes then no semantic rejection will be caused since sending message will contain a value of CL294 while all entries of CL294 are in CL194 as well.   **Impact/Consequence/Risk in case of non-implementation: Yes**  In case of not implementing the change for validating the Customs Office of Exit (Declared) against CL194 instead of CL294, then NAs might face rejections due to the Customs Office of Exit Declared in CC513Cs and CC515Cs.  It is considered that the change proposed via the current RFC - Proposal has impact on business continuity. While considering:   1. different constraints / particularities NAs have in relation to ED change and release management policy, 2. benefits of having this change implemented as soon as possible at least for the CD messages exchanges, 3. trade benefits and ease of operations in case the Declarant/Representative can chose from the beginning the desired OoExtD (Customs Office of Exit Declared) in case he knows that his export will be followed by a transit procedure in an ‘EIN’ role OoExtD (without being necessary any movement diversion as in the current case), 4. the possible rejections in CD between NAs that have different implementation (some validation the CD messages against CL194, some others validation the CD messages against CL294 5. and even though the implementation approach would have been more adequate to be a big-bang one,   The following implementation approach is proposed:  **Proposed** date of applicability in Operations **(T-ops)**:  **For communication in CD:**   1. For the AES NA’s or the NAs entering in AES operation before 01.12.2023 **– as soon as possible/ at the AES operations start, before 01.12.2023** 2. For the NA’s entering in AES operations after 01.12.2023 – **strongly recommended** date **at the AES operations start date.** [When NECA starts exchanging AES messages on the Common Domain (PROD) if they starting after 01.12.2023 (to start production with this change already implemented)]   **For communication in ED:**   1. For the AES NA’s or the NAs entering in operation before 01.12.2023 – **strongly recommended** date **as soon as possible**/**at the AES operations start**, but **not later than 11.02.2025**. The date depends exclusively on NAs constraints in term of ED changes. 2. For the NA’s entering in AES operations after 01.12.2023 – **strongly recommended** date **at the AES operations start**, but **not later than 11.02.2025**   **Proposed** date of applicability in CT **(T-CT)**: 01.02.2024  **Expected** date of approval by ECCG **T-CAB)**: 24.11.2023  **Impact on transition ECS-P2,AES-P1**: None |

**Impact on CI Artefacts**

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| **DDNXA-5.15.1-v1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Updated appendices: Q2, Q2\_R\_C, J, S | |
| **CSE-v51.8.2** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Updates as described in section 3. | |
| **TRP-5.13.0-v1.00** | Cosmetic  Low  Medium  High  Very High  Draft impact on CTP/TRP during the DDNA IAR/RFC proposal:   |  |  |  | | --- | --- | --- | | **Updated TC (Partially Passed or Failed if NA not aligned):** | **No** | None | | **Deleted Test Cases:** | **No** | None | | **New Test Cases:** | **No** | None | | **Updated Drools:** | **No** | None | | **Other:** | The Business Codelist Validation xml file will be updated to match the CL194 instead of CL294 to the related xpaths. | | |
| **DMP Package-v5.8.0-1.00** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Update of ‘AES-Data Mapping-v0.52.xls’ file on R&C fields and update of ‘Rules and Conditions.xls’ file. | |

**Estimated impact on National Projects**

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| Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Replacement of CL294 with CL194 in messages CC513C, CC515C, CC529C, CC536C, CD501C, CD533C, CD540C, CD543C. | |

**Document History**

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| **Document History** | | |  |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFTDEV | 14/03/2023 | *First draft prepared by SOFT-DEV.* |
| v0.20 | Updated by SOFTDEV | 13/04/2023 | *Updates in terms of appendices and versions of impacted artefacts.* |
| v0.30 | Updated by SOFTDEV | 08/05/2023 | *TRP impact added.*  *Submitted for Review to DG TAXUD.* |
| v0.40 | Updated by SOFTDEV | 18/05/2023 | *Incorporated comments by DG TAXUD.* |
| v1.00 | SfA to DG TAXUD. | 22/06/2023 | *Submitted for Acceptance to DG TAXUD.* |
| v1.01 | Updated by TAXUD | 12/10/2023 | *Submitted for Review to NPMs* |
| v1.10 | SfA to NPM | 03/12/2023 | *Submitted for Acceptance to NPM.* |