# Impact Analysis Report / RFC-Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_AES\_0151** (JIRA: UCCAES-2228) |
| **Related Incident ID** | **PM25715/KE23522** |
| **RFC Initiator / Organization** | **DG TAXUD/B3** |
| **CI** | **AES-P1 (DDNXA-5.15.1-v1.00)** |
| **Type of Change** | **Standard  Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | | **Changes in D.G.s ‘TRANSPORT DOCUMENT’GOODS ITEM Level after the end of the Transitional Period.** | |
| **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) based on CSE-v51.8.2** **Corrections in SI level, rolling changes back regarding transitional D.G.s for AES-P1 by removing the 'Transport Document' D.G. from SI level – Revert back the changes introduced by the RFC\_AES\_0135\_SDEV-RFC-IAR-UCCAES1677-v1.10 (SfA-NPM+IMPL), part of RFC-List.37** |
| In AES-P1 and NCTS-P5 transitional Data Groups 'TRANSPORT DOCUMENT' is presented in item level to ensure successful communication with the legacy ECS-P2 and NCTS-P4 systems, respectively. The necessity of those D.G.s in AES-P1 shall be taken into consideration for the post Transitional Period when procedures like export followed by transit (EFBT) take place or combined transit declarations with EXS particulars are submitted.  AES-P1 (DDNXA-5.15.1-v1.00) based on CSE-v51.8.2 is impacted with both structural and business changes (introduction of Guidelines, attachment and rewording of BRTs) to facilitate the links between the domains. |

**Section 2: Problem statement**

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| In both NCTS and AES, the reference to the Data Group ‘TRANSPORT DOCUMENT’ essentially pertains to agreements concerning the transportation of goods. These agreements may include a written contract stating that one of the involved parties will transfer the goods to a specific location on behalf of the other party, or a receipt confirming the transfer of goods.  Τhe economic operator can provide in the declaration these agreements in the form of a Master bill of lading, Bill of lading, House bill of lading, House waybill, Container list, Packing list, Consignment note CIM, Road list – SMGS, Road consignment note, Air waybill, Master airwaybill, movement by post including parcel post, Multimodal / combined transport document, Cargo manifest, Bordereau (cargo load list), ATA carnet.  Code list CL754 – ‘TransportDocumentType’ is attached to the D.I ‘Type’ of D.G ‘TRANSPORT DOCUMENT’ and contains all the above values, related to a transport document. Code list CL754 was created for ICS2 purposes while specific values of the same code list are applicable to other Trans-European Systems (TES). ~~For AES-P1, those values are aligned to UCC DA.~~  In addition to this, a Consignment refers to a shipment or a set of goods that are transported from one location to another under a single transport document or transit declaration. It represents the entire set of goods covered by a single transit operation. A Consignment typically consists of one or more packages or containers, which are grouped together and treated as a single unit during transit.  A House Consignment, also known as a Sub-Consignment, is a term used to describe a subset of goods within a larger Consignment. It represents a portion of the goods that are separated or split from the main Consignment for various reasons, such as delivery to different destinations or different customs procedures. House Consignments are assigned a unique reference number within the parent Consignment and are treated as separate entities for tracking and customs purposes.  According to the descriptions of the values and the definitions of Consignment/House Consignment, D.G ‘TRANSPORT DOCUMENT’ information should logically be present at Consignment or House Consignment level for NCTS and at Goods Shipment level for AES.  In AES-P1, there were issues identified when some countries entered Production, specifically a significant number of messages from ECS-P2 contained substantially more than the 99 recorded TRANSPORT DOCUMENTs, surpassing the maximum limit of x99 that AES-P1 could host at the Goods shipment level. There were also cases in which there was repetition of the same TRANSPORT DOCUMENT for multiple GOODS ITEMs. Considering these issues, it was decided that AES-P1 should adopt the ‘TRANSPORT DOCUMENT’ representation of ECS-P2 (depicted in the GOODS ITEM level) only for the Transitional Period. This has been documented in RFC-List.33 and 34 and implemented in DDNXA-5.14.0-v1.00. A similar issue was identified in NCTS-P5 as well resulting in loss of information between NCTS-P4 and NCTS-P5. The issue was documented under RFC-List.34 and implemented in DDNTA-5.14.0-v1.00.  In AES-P1, it was later identified from some countries that the D.G. ‘TRANSPORT DOCUMENT’ should be kept at GOODS ITEM level even after the Transitional Period, for the below reasons:   * Useful in case of partial examination of goods (i.e. during the control of goods, it is easier for the customs to see which goods item can be found under which transport document); * Identify specific orders or parcels at item level (in the context of e-commerce).   It was later revealed that from the operational and business point of view there is no type of transport document (as per CL754) that could be used at GOODS ITEM level. Therefore, maintaining the D.G. ‘TRANSPORT DOCUMENT’ at GOODS ITEM level after the Transitional Period for AES-P1, resulted in a misalignment with the current specifications of NCTS-P5.   1. Expected issues to be tackled   Taking into consideration the abovementioned facts regarding the involved D.G.s and the proper message structure, data misalignment issues will arise between AES-P1 & NCTS-P5   * In AES-P1, there might be the case of using the D.G. ‘TRANSPORT DOCUMENT’ at GOODS ITEM level as a link with other systems (e.g. temporary storage). Nevertheless, as explained in definition of Transport Document (see above) is mainly used for the transportation of goods and it is advised to be used only for this purpose. Ideally, usage of another D.G. to link AES with those other systems, such as the D.G. ‘SUPPORTING DOCUMENT’. Additionally, a harmonisation is needed among the Trans-European Systems (TES).  1. Τhe data harmonisation is required, and the interoperability across domains and phases has value because:   The data harmonisation between different phases and/or domains is essential as it is intertwined with both the proper facilitation of trade and the seamless interoperability, which has an immense value in it of itself.  In order to enable the UPGRADE of ‘Legacy’ messages between the data groups ‘TRANSPORT DOCUMENT’, was added at GOODS ITEM Level for AES-P1, applicable ONLY during the Transitional Period.   * D.G. ‘TRANSPORT DOCUMENT’   **UCC requirements**      *‘TRANSPORT DOCUMENT’ D.G. as depicted in the Official Journal of the European Union*   * In UCC Data Annex B, D.G. ‘TRANSPORT DOCUMENT’ is:   + mandatory in ‘CONSIGNMENT’ level for EXS declarations;   + optional in ‘GOODS SHIPMENT.CONSIGNMENT’ for export declarations;   + mandatory in ‘CONSIGNMENT’ and ‘HOUSE CONSIGNMENT’ levels for transit declarations;   + mandatory in ‘CONSIGNMENT’ and ‘HOUSE CONSIGNMENT’ levels for ENS declarations.   **Implementation of Technical Specifications approved by ECCG for D.G. ‘TRANSPORT DOCUMENT’**  For **AES-P1** in **DDNXA-5.15.1-v1.00:**  *Extract from message* ***CD501C*** *(DDNXA-5.15.1-v1.00)*  For **NCTS-P5** in **DDNTA-5.15.1-v1.00**:    *Extract from message* ***CC015C*** *(DDNTA-5.15.1-v1.00)*    As shown above, in ‘CONSIGNMENT ITEM’ level, D.G.s ‘TRANSPORT DOCUMENT’ have the **B2400** attached in NCTS-P5. So, as per DDNTA, the D.G.s shall no longer be used from the end of the Transitional Period. Moreover, harmonisation activities are more than necessary across all columns in the UCC DA Annex B and across the domains.  It is evident that in AES-P1, if ‘TRANSPORT DOCUMENT’ will still be available after the end of the Transitional Period, will not be harmonised with the other domains.  All the information provided so far regarding the presence of the D.G. in question shall be taken into consideration to ensure successful and seamless cross-domain communication and procedures:  *Case 1 – Link between EMCS and AES-P1*  In the communication between EMCS (IE801) and AES-P1, no information regarding D.G. ‘TRANSPORT DOCUMENT’ is being used in any external or common domain message; thus, no issue is identified regarding their current optionality status in UCC Data Annex B, DDNXA-5.15.1-v1.00 and DDNEA-3.14 consequently no business impact is foreseen in the linked domains if changing those optionalities. In DDNEA D.G.s ‘TRANSPORT DOCUMENT’ does not exist at item level specifications, as such the optionality of these D.G. creates no business continuity risks. In EMCS there is the D.G. ‘TRANSPORT DETAILS’ but it does not contain the same information as the AES D.Gs ‘TRANSPORT DOCUMENT’. Therefore, regarding the communication between EMCS and AES-P1, there is no reason for the aforementioned D.G to be kept at item level in AES-P1.  *Case 2 – Link between AES-P1 and NCTS-P5*  In an EFBT procedure, consolidated export movements from an Actual Office of Exit are being declared to the other role of the same Customs Office, namely the Office of Departure. The data of the export declarations are included in one transit declaration in different iterations of D.G.s ‘/IE015/CONSIGNMENT/HOUSE CONSIGNMENT’ having as a marking point the value ‘N830’ in the respective D.I.s ‘/IE015/CONSIGNMENT/HOUSE CONSIGNMENT/PREVIOUS DOCUMENT.Type’.  However, there is still an issue regarding the EFBT procedure and the link with AES-P1. In specific, if using this D.G. in export declaration messages at the item level there is no counterpart D.G. at ‘CONSIGNMENT.HOUSE CONSIGNMENT.CONSIGNMENT ITEM’ in NCTS-P5 transit declarations.  Finally, for EFBT procedures with goods under duty suspension (excise goods), the approach is to rely on the existing mechanism and data exchanged between EMCS and AES-P1 that was validated before the goods were released for export with no direct link with NCTS-P5. Thus, no issue in business continuity is identified when D.G. ‘TRANSPORT DOCUMENT’ is taken into consideration.  As per the above, we propose to revert-back the changes introduced in the AES specifications by the RFC-List.37 - RFC\_AES\_0135\_SDEV-RFC-IAR-UCCAES1677-v1.10 (SfA-NPM+IMPL) and to discontinue the usage of the Transport Document at the Goods Item level after the end of Transitional Period. |

**Section 3: Description of proposed solution**

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| In order to align **AES-P1 DDNXA-5.15.1-v1.00**, **NCTS-P6 DDNTA-6.2.0-v1.01** based on **CSE-v60.4.1** with **NCTS-P5 DDNTA-5.15.1-v1.00** based on **CSE-v51.8.2** changes shall be made(addition of **text highlighted in yellow** – removal of ~~text with strikethrough~~) as follows:  **A**. **AES-P1 changes**:   * B2400 shall be attached to D.G. ‘TRANSPORT DOCUMENT’ in messages **CD501C, CD503C, CD538C, CD540C, CD541C, CD543C, CC513C, CC515C** at ‘GOODS ITEM’ level as defined below:   ------GOODS ITEM  (…)  ---------TRANSPORT DOCUMENT O B2400 E1407 ~~G0825~~  Sequence number  Type  Reference number  ---------ADDITIONAL REFERENCE  (...)  **Wording of B2400**  **Technical Description:**  IF <Decisive Date> is GREATER than <TPendDate>  THEN /\*/GoodsShipment/GoodsItem/TransportDocument = “N”  **Functional Description:**  N/A   * B2400 shall be attached to D.G. ‘TRANSPORT DOCUMENT’ in message **CD518C** at ‘GOODS ITEM’ level as defined below:   ------GOODS ITEM  (...)  ---------TRANSPORT DOCUMENT O B2400 B1401 G0360  Sequence number  Type  Reference number  ---------ADDITIONAL REFERENCE  (...)   * The wording of guideline G0825 shall be updated as follows:   Technical Description:  N/A  Functional Description:  (…)  - Goods Shipment related information shall be recorded under  <GOODS SHIPMENT-PREVIOUS DOCUMENT>  <GOODS SHIPMENT-SUPPORTING DOCUMENT>  <GOODS SHIPMENT-ADDITIONAL REFERENCE>  <GOODS SHIPMENT-ADDITIONAL INFORMATION>  <GOODS SHIPMENT-ADDITIONAL SUPPLY CHAIN ACTOR>  ~~<GOODS SHIPMENT-CONSIGNMENT-TRANSPORT DOCUMENT>~~  - Goods Item related information shall be recorded under  <GOODS SHIPMENT-GOODS ITEM-PREVIOUS DOCUMENT>  <GOODS SHIPMENT-GOODS ITEM-SUPPORTING DOCUMENT>  ~~<GOODS SHIPMENT-GOODS ITEM-TRANSPORT DOCUMENT>~~  <GOODS SHIPMENT-GOODS ITEM-ADDITIONAL REFERENCE>  <GOODS SHIPMENT-GOODS ITEM-ADDITIONAL INFORMATION>  <GOODS SHIPMENT-GOODS ITEM-ADDITIONAL SUPPLY CHAIN ACTOR> (…)   * G0825 shall be removed from D.G. ‘TRANSPORT DOCUMENT’ in messages **CD501C, CD503C, CD538C, CD540C, CD543C, CC513C, CC515C** at ‘GOODS ITEM’ level as defined below:   ------GOODS ITEM  (...)  ---------TRANSPORT DOCUMENT O B2400 E1407 ~~G0825~~  Sequence number  Type  Reference number  ---------ADDITIONAL REFERENCE  (...)   * G0989 shall be attached to D.G. ‘TRANSPORT DOCUMENT’ in messages **CC551C, CC598C** at ‘GOODS ITEM’ level as defined below:   ---------GOODS ITEM  (…)  ------------TRANSPORT DOCUMENT O G0360 G0989  Sequence number  Type  Reference number  ---------ADDITIONAL REFERENCE  (…)  **Wording of 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 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 DDNxA APPENDIX Q2**.   * G0825 shall be removed from D.G. ‘TRANSPORT DOCUMENT’ AND G0989shall be attached to D.G. ‘TRANSPORT DOCUMENT’ in messages **CC529C, CC534C, CC535C, CC599C, CD533C** at ‘GOODS ITEM’ level as defined below and:   ---------GOODS ITEM  (…)  ------------TRANSPORT DOCUMENT O ~~G0825~~ G0989  Sequence number  Type  Reference number  ---------ADDITIONAL REFERENCE  (…)   * G0989shall be attached to D.G. ‘TRANSPORT DOCUMENT’ in message **CC507C** at ‘GOODS ITEM’ level as defined below:   ---------GOODS ITEM  (…)  ------------TRANSPORT DOCUMENT O G0330 G0989  Sequence number  Type  Reference number  ---------ADDITIONAL REFERENCE  (…)   * Guideline G0825 was removed from Transport Document in Goods Shipment and Consignment level in the CD501C,CD503C,CC513C,CC515C,CC529C,CD533C,CC534C,CC535C,CD538C,CD540C,CD543C, CC599C messages. * In **DMP** **Package-5.8.0-v1.00**: * **G0825** shall be removed from Transport Document * **BRT B2400** shall be attached in the messages **CD501C, CD503C, CD538C, CC513C** and **CC515C.** * **G0989** shall be attached in the messages **CC507C, CC529C, CC551C** and **CC599C.** * **Appendix K** will be modified with the addition of new **BRT B2400**   **IMPACT ASSESSMENT:**  Important change impacting both Common Domain and External Domain messages AFTER the end of the Transitional Period for AES-P1.  **Risk in case of non-implementation:**  Possible message rejections and blocked movements in case of not implementing the proposed change.  **Proposed** date of applicability in Operations (**T-Ops**):   by TPendDate as defined in CS/RD2-PROD CL990 (likely 11.02.2025, as defined in the draft update of the version 2 of the UCC Work Programme).  **Proposed** date of applicability in CT (**T-CT**):                     01.02.2024  **Expected** date of approval by ECCG (**T-CAB**):                  24.11.2023  **Impacted messages:**  **AES-P1**   * CD501C, CD503C, CD518C, CD533C, CD538C, CD540C, CD541C, CD543C * CC507C, CC513C, CC515C, CC529C, CC534C, CC535C, CC551C, CC598C, CC599C   **Impacted Rules/Conditions, Guidelines:**  **AES-P1**   * G0989, G0825, B2400   **Impacted CI Artefacts:**  **AES-P1:**   * **DDNΧA-5.15.1-v1.00**(**Appendices Q2, Q2\_R\_C, K, D): Yes.** * **CSE-v51.8.2: Yes.** * **AES\_DMP Package-5.8.0-v1.00: Yes.** * **AES\_CTP-5.13.0-v1.00: Yes.** * **AES\_TRP-5.13.0-v1.01: Yes.** * AES\_CRP-5.7.7.1-v1.0: No. * AES\_CTS-5.7.6-v1.00: No. * DDNXA-5.15.1-v1.00 (Main Document): No. * ACS: 5.8.0-v1.00 & ACS-Annex-AES/NCTS: 5.8.0-v1.00: No. * ieCA 1.0.4.1: No. * AES-P1 and NCTS-P5 Long-Lived “Legacy” (L3) Movements Study v1.50-v1.00: No * DDCOM 20.4.0-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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| **DDNΧA-5.15.1-v1.00 (Appendices)**  **AES-P1** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Introduction of new guideline modification of an existing guideline, BRTs attachment and rewordings. Appendix ‘Q2’ and ‘K’ generated by Specs Manager. Manual update of Appendix ‘Q2\_R\_C’, ‘D’ as described in section 3. | |
| **CSE-v51.8.2**  **AES-P1** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Introduction of new guideline, modification of an existing guideline BRTs attachment and rewordings, as described in section 3. | |
| **DMP Package-5.8.0-v1.00**  **AES-P1** | Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Updates in DMP file as described in section 3. | |
| **TRP-5.13.0**  **AES-P1** | Cosmetic  Low  Medium  High  Very High  Draft impact on CTP/TRP during the DDNA IAR/RFC proposal:   |  |  |  | | --- | --- | --- | | **Update TC (Partially Passed or Failed if NA not aligned):** | **Yes** | **For B2400:**  EBS-E2E-CCE-011\_1 | | **Deleted Test Cases:** | **No** | None | | **New Test Cases:** | **Yes** | **For B2400:**   * EFE-B2400\_1 | | **Updated Drools:** | **Yes** | **For B2400.** | | **Other:** |  | Updated applicability of G0991(new), G0825 and G0989. | |

**Estimated impact on National Project**

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| **Cosmetic  Low  Medium  High  Very High**  **Short description**   |  | | --- | | Impact on External/National/Common Domain messages. To be further assessed by each National Project Team that already implemented the RFC\_AES\_0135\_SDEV-RFC-IAR-UCCAES1677-v1.10 (SfA-NPM+IMPL). | |

| **Document History** | | | |
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| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFTDEV | 15/05/2023 | Draft by SOFTDEV |
| v0.11 | Draft by SOFTDEV | 29/05/2023 | Implementing internal comments by SOFTDEV |
| v0.12 | Draft by SOFTDEV | 07/06/2023 | Implementing comments received by DG TAXUD |
| v0.13 | Draft by DG TAXUD | 19/06/2023 | Comments by DG TAXUD |
| v0.14 | Draft by SOFTDEV | 21/06/2023 | Implementing comments received by DG TAXUD |
| v0.20 | SfR to DG TAXUD | 27/06/2023 | SfR submission. Implementing additional comments received by DG TAXUD IT. |
| v0.30 | re-SfR to DG TAXUD | 29/06/2023 | re-SfR submission with no additional implementation |
| v1.00 | SfA to DG TAXUD | 07/07/2023 | SfA submission. Implementing additional comments received by DG TAXUD IT. |
| v1.01 | SfR to NPM | 12/10/2023 | Rewording only for AES case, sent for NPM review |
| v1.10 | SFA to NPM | 03/12/2023 | ~~Delated text~~  Added text  Submitted for acceptance to NPM |