# Impact Analysis Report / RFC Proposal

**Section 1: Meta-data**

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| **RFC ID** | **RFC\_AES\_0153 (JIRA: UCCAES-2457)** |
| **Related Incident ID** | **IM621991** |
| **RFC Initiator / Organization** | **DG TAXUD, NA-NL** |
| **CI** | **AES-P1 (DDNXA-5.15.1-v1.00 - CSE-v51.8.2)** |
| **Type of Change** | **Standard** **Emergency** |
| **Nature of Change** | Justification for Evolutive   |  | | --- | | Only one occurrence of ‘excise’ type document under Previous Document type, per goods item, in messages CC512C, CC513C, CC515C, CC29C, CD501C, CD503C, CD538C, CD540C, CD543C | |
| **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): Rule to restrict only one occurrence of 'C651'/’C658’ under PREVIOUS DOCUMENT.Type, per goods item** |
| R0894 shall be attached in D.I. ‘GOODS SHIPMENT.GOODS ITEM.PREVIOUS DOCUMENT.Type in:   * External Domain IEs: CC512C, CC513C, CC515C, CC529C; * Common Domains IEs: CD501C, CD503C, CD538C, CD540C, CD543C   in order to restrict only one occurrence of PREVIOUS DOCUMENT.Type that is equal to 'C651'/’C658’ per goods item. |

**Section 2: Problem Statement**

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| During AES operations there were reported issues with a discrepancy between AES and ECS-P2 when EMCS related goods are involved, specifically in case the AES export declaration contained more than one ‘C651’ document type under ‘Previous Document Type’ for the same Goods Item. Declaring more than one ‘C651’ previous document type for the same goods item it is possible in AES, while in ECS-P2 R893 prevents more than one ‘AAD’ (similar document type with ‘C651’ in AES) document type to be declared for the same goods item in the ‘Previous Administrative References – Previous Document Type’. Due to this discrepancy between AES and ECS-P2, if the AES declaration contains more than one ‘C651’ document type in one goods item previous document type, then the downgrade will fail in ieCA as the R893 is broken for ECS-P2.  The introduction of rule in the related export declaration messages CC512C, CC513C, CC515C, CC529C, CD501C, CD503C, CD538C, CD540C, CD543C shall mitigate the above constraint.  Additionally, an update of the AES business guidance is required, to be aligned with the proposed approach presented in this IAR.  **Impacted IEs**: CC512C, CC513C, CC515C, CC529C, CD501C, CD503C, CD538C, CD540C, CD543C  **Impacted R/C/G/T/TRT/BRT/CL:** R0894  **Impacted CIs Artefacts**:   * **CSE-v51.8.2: Yes** * **DDNΧA-5.15.1-v1.00 (Appendix Q2, D, K, S): Yes** * **TRP-5.13.4- v1.00: Yes** * CRP 5.8.5-v1.00: No * DDNXA-5.15.1-v1.00 (Main Document): No * CTP-5.13.0-v1.00: No * CTS-5.8.6-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. Rule R0894 shall be introduced with the following wording:   Technical Description:  Only one occurrence of the value in SET {C651, C658} for the D.I. /\*/GoodsShipment/GoodsItem/PreviousDocument/type can be used per goods item.  Functional Description:  Only one occurrence of the value in SET {C651, C658} for the D.I. <GOODS SHIPMENT.GOODS ITEM.PREVIOUS DOCUMENT.Type> can be used per goods item.   1. Rule R0894 shall be attached to messages CC512C, CC513C, CC515C, CC529C, CD501C, CD503C, CD538C, CD540C, CD543C   **FROM:**  (…)  -----GOODS ITEM  (…)  -------PREVIOUS DOCUMENT  Sequence number R n..5 R0987  Type R an4 CL214  Reference number R an..70 E1104 G0321 G0334 R0414  (…)  **TO:**  (…)  -----GOODS ITEM  (…)  -------PREVIOUS DOCUMENT  Sequence number R n..5 R0987  Type R an4 CL214 R0894  Reference number R an..70 E1104 G0321 G0334 R0414  (…)  Validated by Sender: **R**  Validated by Recipient: **N**  **IMPACT ASSESSMENT:**  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 directly (as soon as possible). 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 CC512C, CC513C, CC515C, CC529C are impacted with this RfC proposal.  **Impact on Common Domain – Low**  The Common Domain messages impacted by this RfC proposal are CD501C, CD503C, CD538C, CD540C, CD543C. It is considered that the change proposed via the current RFC - Proposal has impact on business continuity and therefore shall be deployed in a ***flexible approach***.  **Changes at semantic level**  This RfC proposal introduces semantic changes in the External Domain messages CC512C, CC513C, CC515C, CC529C and in the Common Domain messages CD501C, CD503C, CD538C, CD540C, CD543C. The changes at the semantic level namely concern the introduction of R0894 in the D.I. ‘GOODS SHIPMENT.GOODS ITEM.PREVIOUS DOCUMENT.Type’.  It is considered that although the change proposed has impact on business continuity it might be deployed in a ***flexible*** approach. More specifically, for the change concerning the introduction of rule R0894 for the Common Domain:   * In case the sender of CD501C, CD503C, CD538C, CD540C, CD543C is aligned with the proposed change while the receiver is not, R0894 will be respected, then no semantic rejection will be caused since the occurrence of only one ‘C651’ / ‘C658’per goods item will not cause a rejection by the receiver. * In case the sender of CD501C, CD503C, CD538C, CD540C, CD543C is not aligned with the proposed changes and the receiver is aligned with the proposed changes, while the recipient shall not validate the R0894 then no rejection shall be caused.   **Impact/Consequence/Risk in case of non-implementation: Yes**  In case of not implementing the change more difficult checks at the Office of Export / MSA of export in relation to the cross-checking and validation of the goods under duty suspension arrangements shall be performed, increasing the risks of misuse and rejection of ARC /UBR information.  During transition period, in order to handle the difference between AES and ECS-P2 in case of downgrade of CD501C/CD503C/ CD538C, the Conversion Technical Specifications will be updated, by downgrading the first instance of D.G. “GOODS ITEM - PREVIOUS DOCUMENT” with D.I. “Type” equal to ‘C651’ into ‘AAD’, while for all the other (possible ) instances of “GOODS ITEM - PREVIOUS DOCUMENT” with D.I. “Type” equal to ‘C651’ to downgrade it to document type ‘ZZZ’. The ARC (included in AES <GOODS ITEM - PREVIOUS DOCUMENT.Reference number>) and UBR (included in AES <GOODS ITEM - PREVIOUS DOCUMENT.Goods item number>) numbers will be downgraded in the ‘Reference number’ of <PREVIOUS ADMINISTRATIVE REFERENCES> in both above cases. This downgrade conversion resolution avoids rejections due to R893 in ECS-P2, while the information (ARC+UBR) will still be kept inside the downgraded messages.    **Proposed** date of applicability in Operations **(T-ops)**: ***flexible approach***, before **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, D, S, K | |
| **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** | **For R0894:**   * EFE-R0894\_1 | | **Updated Drools:** | **No** | For R0894 | | **Other:** |  | | |
| **CRP-5.8.5-v1.00** | **Cosmetic  Low  Medium  High  Very High**  **Short description**   |  | | --- | | **New CRP will be released to incorporate the updated Drools from the TRP package.** | |

**Estimated impact on National Projects**

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| Cosmetic  Low  Medium  High  Very High  Short description   |  | | --- | | Introduction of R0894 in messages CC513C, CC515C, CC529C, CD501C, CD503C, CD538C, CD540C, CD543C | |

**Document History**

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| **Document History** | | |  |
| **Version** | **Status** | **Date** | ***Comment*** |
| v0.10 | Draft by SOFTDEV | 20/09/2023 | *First draft prepared by SOFT-DEV.* |
| v0.20 | Updated by SOFTDEV | 25/09/2023 | *Minor corrections after DG TAXUD’s feedback.* |
| v1.00 | Final version | 27/09/2023 | *Final version. Implementing additional comments received by DG TAXUD and NA-DE* |
| v1.01 | SfR to NPM | 12/10/2023 | Updating implementation approach, implementation deadlines, improved text |
| v1.10 | SFA to NPM | 03/12/2023 | Added text  *Submitted for Acceptance to NPM.* |