

DG TAXUD



RFC-List version	RFC #	SYNERGIA	A5 Ref.
tbd	#392	KE13869 KE14154 KE14578	(651)
CUSTOMS/RFC: TIR carnet – Document Ref. (C902) & IE111-IE112 & HOLDER ID TIR		RFC Version: 1.00-EN	Status: Accepted by NPM

RFC Proposal			
RFC Title	TIR carnet – Document Ref. (C902) & IE111-IE112 & HOLDER ID TIR		
Related Incident(s) / Known Error	IM110046/KE13869 - IM129532/KE14578 - IM119925/KE14154		
Impacted Systems	NCTS <input checked="" type="checkbox"/> ECS <input type="checkbox"/> ICS <input type="checkbox"/> EOS <input type="checkbox"/> COPIS <input type="checkbox"/> TARIC <input type="checkbox"/> RISK Mgmt <input type="checkbox"/> NCTS-TIR-RU <input checked="" type="checkbox"/>		
Type of Change	Simplified <input type="checkbox"/> Standard <input checked="" type="checkbox"/> Emergency <input type="checkbox"/>		
Affected Document(s) & Version	FTSS - DDNTA v19.40 - DDSPEED v5.00		
Implementation date	Proposed by COM	01/10/2017	Big bang (Y <input checked="" type="checkbox"/> /N <input type="checkbox"/>)
	Decision by ECCG-20	dd/mm/yyyy	Big bang (Y <input type="checkbox"/> /N <input type="checkbox"/>)

Analysis – Justification

THIS NEW VERSION WAS SENT FOR NPM REVIEW WITH VARIOUS CORRECTIONS, TO TAKE INTO ACCOUNT THE INPUT FROM THE UCC NCTS PROJECT GROUP AND THE COMMENTS FROM THE FIRST REVIEW CYCLE.

This RFC-Proposal contains three changes related to the TIR movements.

1) TIR carnet number – Format change by IRU.

IRU contacted DG TAXUD to inform that the existing TIR carnet number limit (a2+n8), that is imposed by their current format, will be reached in the near future. This format n10 is also defined in the FTSS and in the DDNTA v19.40.

In order to avoid any rejection of NCTS message due to the evolution planned by IRU, it is required to also adapt the NCTS specifications. The condition C902 that is defined in the FTSS and DDNTA must be adapted accordingly. This Condition is also applied in NCTS/TIR-RU:

C902 is currently defined as

```
IF "Document Type (box 44)" = '952',
THEN "Document Reference (box 44)" = 'R'
ELSE "Document Reference (box 44)" = 'O'
The document reference in case of Document Type '952' has to have the format an10 and must follow the algorithm used by IRU.
```

The format of the 'Document Reference' of the TIR carnet ("Document Type" = '952') should no more be restricted to 'an10', as it will become 'an11' and **much** later 'an12' when needed (no exact date **are** defined by the IRU **for these switches to 'an11' and to 'an12'**, it depends on the 'consumption' of the TIR carnets).

It is proposed that the C902 defines only the conditionality that shall be fulfilled. In addition, a new Technical Rule will define the format of the corresponding data item in case of "Document Type (box 44)" = '952'.

It is not recommended to define the format as 'an.12' directly, because in such case, a Document Reference with the value 'dummy1' (a string of 6 alphanumeric characters) would not be immediately



rejected. Considering that the switch from 'an11' to 'an12' would likely be many years after 2017, it's proposed to only mention 'an11' and no more 'an12' in the new TR.

This change is required to avoid the rejection of NCTS messages due to the evolution at IRU expected in 2017. See also [IM110046](#) for more details.

Notes

1. Due to the undefined transition date, and because it's not a big bang at IRU, the TR will mention 'an10' *or* 'an11' as valid formats.
2. The IRU compliance algorithm is currently implemented by STTA and TTA in the C902. It will be available to the National Project Teams via the new TR0016, and also available in the future CTA application that will replace TTA and STTA.
3. The IRU algorithm is not changing because the format will change from 'an10' to 'an11'. The current allowed format is XX+8 digits, where the characters XX are calculated based on the 8 following digits. This algorithm is maintained by IRU that confirmed that the logic does not change when we have XX+9 digits (or XX+10 digits much later, covered by another RFC-Proposal).
4. The validation of the new TR0016 *must* be performed on the External Domain messages received from the Trader, the validation *may* be re-applied by the Country of Destination receiving the Common Domain messages (including the IE001), but this 're-validation' is only recommended.

2) Removal of the messages IE111 and IE112.

2.1 In the version 0.20 of the RFC-Proposal, it was proposed to modify the messages IE111 and IE112 based on the following justification:

Under incident [IM129532](#) (initiated by NA-CZ, who identified the problem while reviewing the specifications before updating their application), DG TAXUD/A3 confirmed that *the outcome of the IE111 request (that is answered by the IE112 message) is that the Principal has confirmation or denial that a given consignee is an Authorised Consignee at the specified Office of Destination.*

But in fact, there is no real relationship between the "Holder ID TIR" and the "Authorised Consignee". In other words the "Holder ID TIR" includes the Trader who is the holder of the TIR procedure when launching a TIR transit movement. Consequently, the "Holder ID TIR" is not necessary in the IE111 and IE112 messages.

Considering this position, it was required to remove the data item 'Holder ID TIR' from the data group '(AUTHORISED CONSIGNEE) TRADER' in the messages IE111 and IE112.

By applying this correction (both in functional and technical specifications), the content of the datagroup '(AUTHORISED CONSIGNEE) TRADER' in the IE111 and IE112 would be aligned with the content of this same datagroup in the message IE015.

2.2 In this version of the RFC-Proposal, it is now proposed to phase out the messages IE111 and IE112, based on the following justification:

Considering the discussions that took place during the Project Group UCC NCTS during the second quarter 2016, it is now proposed to avoid any change to the structure of the messages IE111 and IE112, but to remove them from the specifications, for the following reasons:

- Between 01.01.2015 and 30.06.2016, only 37 messages IE111 were sent, and only 19 messages IE112 sent as response. The main active country was NL with 32 messages IE111 sent (17 responses received);



- Some MS did not implement this features (multiple National Deviations were accepted by DG TAXUD);
- The 'Holder ID TIR' can be verified by the MS by connecting to the IRU database;
- The status of Authorised Consignee will be managed within the Customs Decision application,

In consequence, there will be no more need to exchange the IE111 and IE112. The phasing out of IE111 and IE112 in October 2017 can be easily implemented:

- By applying the change in the few NTA having this feature, and/or
- By blocking the messages at the CCN gateway level (i.e. no development/testing costs for the MS).

3) Data Item '(PRINCIPAL) TRADER. Holder ID TIR' is not language specific.

Under incident [IM90735](#) (initiated by NA-DE in the context of operational rejections) it was identified that the CD012B sent to DG TAXUD (SPEED platform) was not correct, and the CDS01A sent by DG TAXUD to Russia included the same invalid character (Error reason: "Invalid byte 2 of 2-byte UTF-8 sequence") in the data item 'Holder ID TIR'. In consequence, the Russian application rejected (correctly) the message with CD917A.

DDNTA v19.40 defines that this data item 'Holder ID TIR' is a non-LNG field as illustrated in Appendix I (similar in Appendix Q2):

	MESSAGE - (PRINCIPAL) TRADER	
	MESSAGE - (PRINCIPAL) TRADER.Name	an..35
	MESSAGE - (PRINCIPAL) TRADER.Street and number	an..35
	MESSAGE - (PRINCIPAL) TRADER.Postal code	an..9
	MESSAGE - (PRINCIPAL) TRADER.City	an..35
	MESSAGE - (PRINCIPAL) TRADER.Country code	a2
	MESSAGE - (PRINCIPAL) TRADER.NAD LNG	a2
	MESSAGE - (PRINCIPAL) TRADER.TIN	an..17
	MESSAGE - (PRINCIPAL) TRADER.Holder ID TIR	an..17
	MESSAGE - GUARANTOR	
	MESSAGE - GUARANTOR.Name	an..35
	MESSAGE - GUARANTOR.Street and number	an..35
	MESSAGE - GUARANTOR.Postal code	an..9
	MESSAGE - GUARANTOR.City	an..35
	MESSAGE - GUARANTOR.Country code	a2
	MESSAGE - GUARANTOR.NAD LNG	a2
	MESSAGE - GUARANTOR.TIN	an..17

CSE 37.70

With DDCOM v14.10 that defines that:

"V.2.1.2.1.2 Non-language sensitive text fields

Only ASCII printable characters (characters #32 to #126 decimal) can be used for these fields, unless otherwise specified by a codelist or rule applied to the text field."

The National Project Team identified a possibility for different interpretation of the language-sensitivity of this data field, based on the layout of the Functional Specifications, as illustrated below:

**TRADER Principal**

Trader Principal TIN (box 50)	O	an_17	
Holder ID TIR	C	an_17	Cond 904
Name (box 50)	R	an_35	
Street and number (box 50)	R	an_35	
Country (box 50)	R	a2	
Postcode (box 50)	R	an_9	
City (box 50)	R	an_35	
NAD_LNG	O	a2	Rule 99

CUSTOMS OFFICE of Transit

Reference Number (Box 51)	R	an8	
Date and Time of arrival	C	n12	Cond 598 Rule 660

where the LNG data field is mentioned at the end of the data group '(PRINCIPAL) TRADER'.

Therefore, it seems justified for all MS to implement (if not done yet) a technical check to prevent the usage of non-ASCII characters in this data field, and to enforce this constraint which is based on the IRU recommendation.

This clarification of the DDNTA will avoid the rejections observed in operations by translating in technical terms the explanation existing in the FTSS for the 'Holder ID TIR' (see FSS-NCTS-Appendix D1-Rev.1-2009): *only ASCII characters can be used, it's NOT language dependent.*

Proposed Changes (Functional)**1. TIR carnet number – Format change by IRU.**

The footnote of the condition C902 to be deleted. It will be covered by the new technical rule TR0016.

```
C902 IF "Document Type (box 44)" = '952'45,
      THEN      "Document Reference (box 44)" = 'R'
      ELSE      "Document Reference (box 44)" = 'O'
```

⁴⁵ The document reference in case of Document Type '952' has to have the format an10 and must follow the algorithm used by the international organisation (Article 6.2 bis of the TIR Convention).

2) Removal of the messages IE111 and IE112.

2.1) The process ' 1.10. C008 - Process confirm authorised consignee' will be removed from the Functional Specifications (Document ' 2ftss-4-0-e-FTSS CORR 2013_2-SECTION II-BUSINESS PROCESS THREADS FOR CORE BUSINESS_SfA')

2.2) The messages IE111 and IE112 will be removed from the document 'BFTSS-4_0-e-NCTS – Corrigendum 1-2015 – final version IE messages_SfA'.

3) Data Item '(PRINCIPAL) TRADER. Holder ID TIR' is not language specific.

No change in the FTSS, changes only needs to be applied on DDNTA level (to become aligned to FTSS).



Proposed Changes (Technical)

1. TIR carnet number – Format change by IRU.

1.1 Appendix Q2 of DDNTA v19.40 and Appendix Q2 of DDSPEED v5.00 will be changed as follows:

The condition C902 is modified:

C902

IF PRODUCED DOCUMENTS/CERTIFICATES.Document Type= '952',
THEN PRODUCED DOCUMENTS/CERTIFICATES.Document Reference is 'Required'
ELSE PRODUCED DOCUMENTS/CERTIFICATES.Document Reference is 'Optional'

The document reference in case of Document Type '952' has to have the format an10 and must follow the algorithm used by IRU.

1.2 Appendix Q2 of DDNTA v19.40 and Appendix Q2 of DDSPEED v5.00 will be changed as follows:

The new technical rule TR0016 is created:

TR0016

IF 'PRODUCED DOCUMENTS/CERTIFICATES .Document type' = '952',
THEN ((the Document Reference must have the format an10 or an11 or an12) AND
(the Document Reference must follow the algorithm defined by IRU. [see DDNTA Main Document](#))).

This new technical rule TR0016 will be applied next to C902, on the data item 'Document Reference' for the following messages: CD001B, CD003B, CD012B, CC013B, CC015B, CC017B, CC029B, CD038B, CC044A, CD050B, CC051B, and CD115B of DDNTA.

1.3 The following change will take place in Appendix X of DDNTA v19.40:

The new TR0016 will be added in the relevant xsd files of Appendix X.

The files CC013B.xsd, CC015B.xsd, CC017B.xsd, CC029B.xsd, CC044A.xsd, CC051B.xsd, CD001B.xsd, CD003B.xsd, CD012B.xsd, CD038B.xsd, CD050B.xsd and CD115B.xsd will be modified as follows:

```
(...)  
<xs:element name="DocRefDC23" type="simple:Alphanumeric_Max35" minOccurs="0">  
  <xs:annotation>  
    <xs:documentation>  
      (...)  
      <doc:rule name="TR0016" />  
      <doc:condition name="C902" />  
    </xs:documentation>  
  </xs:annotation>  
</xs:element>  
(...)
```



1.4 The following change will take place in Appendix X of DDSPEED v5.00:

The new TR0016 will be added in the file **complex_types_speed.xsd** of Appendix X as follows:

```
...
<xs:element name="DocRefDC23" type="Alphanumeric_Max35" minOccurs="0">
  <xs:annotation>
    <xs:documentation>
      <description value="Document reference" />
      <doc:rule name="TR0016" />
      <condition name="C902" />
    </xs:documentation>
  </xs:annotation>
</xs:element>
...
```

1.5 The following change will take place in the DDNTA Main Document

The following section will be inserted:

1.III.4 The IRU compliance algorithm for Reference Document

The algorithm used by IRU to validate the TIR Carnet Number is published on CIRCABC
- Direct link: <https://circabc.europa.eu/w/browse/00205ce8-8219-4643-9c6c-ab108e05b836>
- Interest Group "<e- Customs - IT aspects>"
- Path: Library > 02_NCTS > 03 TECHNICAL SPECS > 01 DDNTA

The version 1.00 of the TXT file (DDNTA RFC-List 29#392 IRU's algorithm for TIR Carnet Nr v1'00.txt) is embedded in this DOC version for information. Please consult CIRCABC to be sure that the latest version is used



IRU Algorithm v1.00

Ändrad fältkod

2) Removal of the messages CD111A and CD112A.

The messages CD111A and CD112A will be removed from the Main Document and from the various Appendices, as needed.

The condition, C017, C037 and C290 and rule R017, that are only applied in those two messages will be also removed from the DDNTA Q2.



3. Data Item '(PRINCIPAL) TRADER. Holder ID TIR' is not language specific.

3.1 Appendix Q2 of DDNTA v19.40 will be changed as follows:

The existing C904 that is applied on the data item 'Holder ID TIR' will be modified as follows:

C904

IF 'Declaration Type' = 'TIR',
THEN "Holder ID TIR" = 'R',
ELSE "Holder ID TIR" cannot be used.

Note: 'Holder ID TIR' is a non-language sensitive text field, as defined in DDCOM.

The above changes will affect the DDNTA v19.40 and DDSPEED v5.00.

Proposed Changes (BPM Level1-Level4)

L3 & L4 N/A

Proposed Changes (other CIs with possible impact on National applications)

- -

Related Changes in COM applications (For information only)

CTP, TTA-STTA	<ol style="list-style-type: none"> 1. No scenario is specifically testing the format an10 of the TIR carnet in IE001. Data set may be adapted to illustrate the case of TIR carnet with 'an11' or an12 format. 2. The scenarios with CD111A and CD112A will be phased out in CTP/NCTS. 3. No need for an FE scenario testing the rejection based on 'Holder ID TIR' with non ASCII characters.
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Risks

Risk of implementing (incl. Risk Level)	1. & 2. & 3. Very low level of risk identified for implementation (only standard regression).
Mitigation actions	<ol style="list-style-type: none"> 1. This change must be properly synchronised to avoid problems with all TIR movements. 2. IE111 and IE112 will be blocked at CCN level by DG TAXUD. 3. Not applicable.
Impact of not implementing	<ol style="list-style-type: none"> 1. If some NAs do not implement the change, this may lead to rejections and blocked movements. (only if the Box44 includes only the TIR Carnet reference, and the receiving NTA is still expecting strictly 'an10' and receives a document reference with format 'an11' (or an12 in the future). (high impact)) 2. No impact on Common Domain, considering that the IE111 and IE112 would be blocked at CCN level by DG TAXUD. 3. None, unless the IE015 provided by trader is not verified at all for TIR data, and non ASCII characters are still forwarded on the Common Domain. (low impact)

Document History

Version	Status	Date	Comment
v0.01	Draft by CUSTDEV3	26/08/2015	Sent to DG TAXUD for information.
v0.02	Draft by CUSTDEV3	07/09/2015	Sent to DG TAXUD for review.
v0.10	Update by DG TAXUD/A5	07/04/2016	Corrections in various sections.
v0.11	Update by DG TAXUD/A5	25/04/2016	Implemented DG TAXUD clarifications.




Document History			
v0.12	Ready for CAB@TAXUD	12/04/2016	Implemented DG TAXUD/A3 update.
v0.13	Ready for CAB@TAXUD(2)	12/05/2016	Additional correction defined for the FTSS section.
v0.20	NPM Review	13/05/2016	Sent for NPM Review .
v0.21	Update by DG TAXUD/A5	25/07/2016	Change of point 2: removal of IE111 and IE112, in place of correction of those messages. Reviewed during CAB on 27/07.
v0.22	Update by DG TAXUD/A5	28/07/2016	Cosmetic changes as agreed during CAB@TAXUD. Update of the change related to 'Holder ID TIR', to reduce the risk of rejections on the Common Domain. Remains aligned to FTSS.
v0.30	NPM Review #2	29/07/2016	Sent for NPM Review .
v1.00	Accepted	23/09/2016	No comment to be implemented (see details in section 'Information about the NPM Review')

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Review information #1
<ol style="list-style-type: none">Review by NPMs from 13/05/2016 until Tuesday 31/05/2016 COB.File also published on CIRCABC in the interest group « e-Customs IT aspects »: https://circabc.europa.eu/w/browse/a84670d1-e588-4860-8d88-38658f57ca9c → Library > 01 Common NCTS ECS ICS > 04 TECHNICAL SPECS > 04 RFCs > 11 RFC ProposalsComments to be sent to: support@itsmtaxud.europa.eu with cc to taxud.e-customs.technical-specs@ec.europa.eu.

Review information #2
<ol style="list-style-type: none">Review by NPMs from 01/08/2016 until Friday 02/09/2016 COB.File also published on CIRCABC in the interest group « e-Customs IT aspects »: https://circabc.europa.eu/w/browse/a84670d1-e588-4860-8d88-38658f57ca9c → Library > 01 Common NCTS ECS ICS > 04 TECHNICAL SPECS > 04 RFCs > 11 RFC ProposalsComments to be sent to: support@itsmtaxud.europa.eu with cc to taxud.e-customs.technical-specs@ec.europa.eu.

Information about the NPM Review
Comments/responses received from NA-CH, NA-DE, NA-IT, NA-NL, NA-PT, NA-UK and DG TAXUD. 'No Action' on 5 comments, 4 comments 'To Be Implemented' (from NA-DE, NA-UK and DG TAXUD) - See changes applied in track change on page 1-2-5-6-7 . Details in the embedded PDF file:  APO on (651) APO published on CIRCABC on 15/09/2016 and in SYNERGIA (cf. IM162897).

ECCG Decision
Formal decision pending: expected on 5-6/10/2016.