



RFC-List version	RFC #	SYNERGIA	A5 Ref.
TBD	#389	KE12617	(603)
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CUSTOMS/RFC: Fixing C001, C002, C030, C140, R010, R011, C140, R902, TR0601, TR0630

**RFC Proposal**

<b>RFC Title</b>	CUSTOMS/RFC: Fixing C001, C002, C030, C140, R010, R011, C140, R902, TR0601, TR0630		
<b>Related Incident(s) / Known Error</b>	<a href="#">IM22288</a> , <a href="#">IM27647</a> , <a href="#">IM29977</a> , <a href="#">IM28393</a> , <a href="#">IM41003</a> , <a href="#">IM96996</a> / KE12617		
<b>Impacted Systems</b>	NCTS <input checked="" type="checkbox"/> ECS <input checked="" 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 type="checkbox"/>		
<b>Type of Change</b>	Simplified <input type="checkbox"/> Standard <input checked="" type="checkbox"/> Emergency		
<b>Affected Document(s) &amp; Version</b>	FTSS corrigendum 2015/1, DDNTA-v19.40, FTSS-AES corrigendum 2013/2, DDNXA-v10.30		
<b>Implementation date</b>	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**

*Il était une fois, il y a bien longtemps ...*

On 24/08/2001, in the Historical Call [6138](#), **NA-CH** reported the incoherence with C140, C001/C002 and R011 that cannot be applied simultaneously.

*If different consignees are declared, and only one country of destination being (in) one of the contracting parties, then:*

- C140 defines that the the Country of Destination must be at HEADER level;
- According to C001, as the Country of Destination is at Header level and contains one the Contracting Parties, then the Consignee is required at the Header level,
- But, the R011 explains that with multiple different Consignees, the details of each Consignee is declared at the Goods Item level.

On 20/11/2008, a similar call was opened by **NA-FR** (cf. [INC0811.116377](#)) with the following position:

- 1/ In the condition C002 it's written : "if country of destination on Goods Items level .../... then the data group trader consignee (ex box 17a ) is required "
- 2/ In the condition C140 it's written : "if only 1 country of destination is declared, then country of destination on header level is required "

*Let's start a thought experiment. We will take the case of several items sent to CH, each to a different consignee trader. Logically, each item has a destination country (Country of destination code on Goods Item level = ex box 17a) valued to CH, and a trader consignee box valued too (Trader consignee data group on Goods Item level = ex box 8). Each value should be put here in box ex 8 (good items level) because of condition C002.*

*Then application of C140 will bring back the value of boxes ex 17a (at the goods item level) to box 17a (at header level) since we only have one country of destination.*

*However, this should trigger the application of condition C001, which mandates to value box 8 at the header level, although boxes ex 8 at the goods item level have already been filled.*

On 27/07/2009, the same problem was reported for Operations by **NA-GR** in [INC0907.133355](#):



*There is problem with the movements which have more than one TRADER CONSIGNEES IN THE SAME COUNTRY!!!*

*There is only one country of Destination, so, box 17 is required according to C001 and C140, and box8 must be completed too. But when there are more than one trader Consignee the ex box 8 must be field AND IF this happens ex box17a should be field according to C002 and C140. C140 contradicts with C001 AND C002. We rejected several movements with these characteristics (see also INC0709.133138). Because we obey to C001 but I believe it must be a clarification and maybe a new Condition should be applied to cover this situation.*

DG TAXUD's position in [QA 09 081.doc](#) mentioned: *We understand that the situation when there are two conditions (C1 and C2) with the same meaning is confusing. It could be changed in the FTSS in the future.*

One year later (2010), **NA-FI** reported a similar problem in [INC1004.149083](#), analysed as follows by Custdev:

*According to NA-FI, there is a conflict between R011 and C002 in the following occasion: According to R011, if the consignee trader is the same for every GI in the declaration, then it must be declared once at the Header level. Nevertheless, according to C002 if the destination code at the GI level is filled in and contains one of the Contracting Parties or is AD or SM, then Trader Consignee should be also filled in at the Goods item level, which breaks R011 in case the Consignee trader is the same for every GI and thus we have a conflict between R011 and C002.*

*The above (...) inconsistency affects common and external domain messages (IE001, IE003, IE011, IE012, IE013, IE015, IE029, IE038, IE043, IE050, IE051, IE115). Moreover, CUSTDEV prefers a solution at the DDNTA level and not just an application workaround as NA-FI propose to take into consideration the case of checking the validity of the R010 in order not to violate it and apply it for R011, which is sincerely a perfect workaround until when this issue is resolved.*

On 14/02/2012, a call ([IM22288](#)) open for **NA-PL** was related to the same issue. NA-PL concluded:

*The Polish NTA at this moment works properly according rules & condition described in the DDNTA for the consignee data, however we note that C001&C002 should be changed and we are waiting for results of review of analysis by DG TAXUD.*

On 08/05/2012, the operations were impacted by the new implementation of C001 by **NA-SI**. A work around was quickly implemented by NA-SI, and the rejections stopped (see [IM25889](#)).

Few months later (on 02/07/2012), **NA-HR** reported a problem with C001 implementation (cf [IM28393](#)), highlighting the same issue due to inconsistency of the Rules & Conditions.

On 11/09/2012, **DG TAXUD/A3** provided the following position:

*TAXUD/A3 confirms that C001 should be understood as it was proposed by CustDev:*

*IF 'Country of Destination' (box 17a) on HEADER level contains one of the Contracting Parties, or is AD or SM*

*THEN TRADER Consignee (box 8) or (ex box 8) = R*

*ELSE TRADER Consignee (box 8) or (ex box 8) = O*

*Contracting parties are :*

*the individual countries of EFTA, HR, TR, or EU as a group.*

On 23/04/2013, **NA-UK** opened a call ([IM41003](#)) for a similar issue observed in operations. NA-FR explained that:

*In the messages received from the NA-UK:*

- The country of destination, 'TR', common to both articles, is shown in HEADER level.*
- The consignee, for two different articles, is recorded at GOODS ITEM level.*

*According to both C001 and C002 rules, we can understand that if the country of destination is an EFTA country, SM, AD or TR, and the country is at HEADER level then the consignee must be at HEADER (and*



therefore be common to different items).

In this long pending call, CUSTDEV2 provided on 18/02/2014, the following position:

*According to the provided information NTA.FR has rejected IE001 (MRN 13GB000060112CD6F6) from NTA.GB with IE906. In the rejection message the violation of C001 is reported. In IE001 from NTA.GB the 'HEADER.Country of destination code' is TR (Turkey) and the '(CONSIGNEE) TRADER' data groups (different traders presented) are used at the GOODS ITEM level.*

*According to the current definition of C001 the '(CONSIGNEE) TRADER' at the MESSAGE level must be used if the 'Country of destination code' on HEADER level is TR.*

*KEL proposal 'Conflict Resolution between R011, C001 and C002' is created in order to solve the existing conflict between conditions and rule in the specifications (DDNTA). The conflict appears in cases when:*

- *Same consignee is used for different countries of destination;*
- *Different consignees are used for the same country of destination (as in this case with MRN 13GB000060112CD6F6);*

*Within the KEL proposal it is proposed to reword C001 and C002 in order to allow usage of '(CONSIGNEE) TRADER' either at MESSAGE or at GOODS ITEM level.*

On 21/10/2014, the next country to open an interaction at ITSM Support on the C001 was NA-PL (see [IM94322](#)). For this incident, it was described that NA-PL rejected the IE001 from NA-CZ due to the violation of C001 by **NA-CZ**:

*The Country of Destination in the IE001 is PL and PL always treated each EU country code as the one of the Contracting Parties mentioned in the condition; consequently, PL rejected the IE001 with IE906.*

And NA-CZ confirmed that:

*We have further investigated the issue and identified an error in implementing the condition C001. It will be repaired in the new release of our application at the end of November 2014.*

On 05/11/2014, **NA-PL** highlighted some confusion in the interpretation of the C001 by TAXUD contractor (see [IM95990](#)):

*In IRF attached to IM94322 I found some discrepancies which I present below. In section 1 of the mentioned document there is stated:*

*"(...) In this case we have a wrong interpretation of C001. According to this condition, contracting parties are the individual countries of EFTA, TR, or EU as a group. Every EU country (separately) cannot be considered as contracting party, but EU as a group can be considered instead. NTA-PL should be amended. (...)"*

*But in Section 2 the following information is present:*

*"(...) The violation of C001 can be found in IE906 message sent by NA-PL. This message sent by NA-PL as response to the (C\_AAR\_SND) IE001 message sent by NA-CZ. In more detail, the Header part of the IE001 is presented below:*

*In this HEADER part the Country of Destination attribute (CouOfDesCodHEA30) has as value 'PL'. In line with condition C001, this value is on one of the contracting parties and so TRADER Consignee (box 8) is required "R".*

*...*

*For the above purposes NA-CZ is requested to be amended."*

*I'm confused now because I don't know who's interpretation of the C001 is correct: PL's or CZ's. I can*



suppose that PL's one because KE is created for CZ, but please confirm this.

The position of **DG TAXUD/A3** on the question from NA-PL was

*In FTSS the current definition of Contracting parties is as follows:*

*' Contracting parties are : the individual non EU countries of the Convention on Common Transit procedure and EU as a group.'*

*In our opinion this definition is clear enough and should not cause any confusion. However an additional explanation could be added into the technical documentation if necessarily.*

However, this clear position by DG TAXUD/A3 in November 2014 is in conflict with the implementation by DG TAXUD/A5 in TTA (and MCC, years ago), and tested during many CTs by all countries, with the code of C001 based on country codes defined as follows:

*Content of the Technical Codelist CL070 + 'EU' (with CL070 defined as All the countries included in code list CL009 excluding 'AX', 'GF', 'GG', 'GP', 'IM', 'JE', 'LI', 'MC', 'MF', 'MQ', 'RE', 'SJ' and 'YT'.)*

But in the DDNTA v18.00 (aligned KEL.27) the new TR0601 clarified C001 by explaining which codes are valid:

*TR0601 The country codes listed in C001 can be found in CL009.*

(with CL009 being the Business Codelist maintained in CS/RD that can be found by selecting the countries with Country Regime different from 'OTH' (i.e. 'EEC' or 'OTH')).

This contradiction was reported by **NA-CZ** in [IM98732](#) who concluded after the installation of the new C001:

*many IE001B/IE003B had been rejected so we switched off the validation of C001 for smooth customs clearance.*

**In summary**, the conflict in Rules & Conditions appears in the following cases:

1/ **multiple different traders-consignees** are declared and the goods have the same Country of Destination:

- Based on C140, the 'Destination country' must be filled in at the HEADER level,;

Condition C140 says:

IF only 1 Country of destination is declared  
THEN "Destination country (box 17a)" on Header level = "R"  
"Destination country (ex box 17a)" on GOODS ITEM level can not be used  
ELSE "Destination country (box 17a)" on Header level can not be used  
"Destination country (ex box 17a) GOODS ITEM level = "R".

- To satisfy C001 (having 'Destination country' present at the HEADER level), **only one '(CONSIGNEE) TRADER' on HEADER level can be declared;**

Condition C001 says:

IF "Country of Destination" (box 17a) on HEADER level contains one of the Contracting Parties, or is AD or SM  
THEN TRADER Consignee (box 8) = "R"  
ELSE TRADER Consignee (box 8) = "O"

Contracting parties are :  
The individual non EU common transit country and EU as a group.

But multiple consignees should be declared, per above assumption.



2/ the same consignee is used for different countries of destination:

- Based on R011, the same **Consignee must be declared at the HEADER level**.

Rule R011 says:

When the same Consignee is declared for all goods items, the data group 'TRADER Consignee (box 8)' on TRANSIT OPERATION/EXPORT OPERATION level is used. The data group 'TRADER Consignee (ex box 8)' on GOODS ITEM level cannot be used.

- According to C140, the different countries of destination must be specified on the GOODS ITEM level.
- But according to C002, having the Country of Destination (matching CL009) at Goods Item level (based on R011), the **Consignee trader must be declared on the GOODS ITEM level** (and is optional on the HEADER level due to C001).

Condition C002 says:

IF "Country of Destination" (ex box 17a) on GOODS ITEM level contains one of the Contracting Parties (see definition in C001), or is AD or SM  
THEN TRADER Consignee (ex box 8) = "R"  
ELSE TRADER Consignee (ex box 8) = "O"

In order to resolve the conflict between C001, C002, C140 and R011., it is proposed to update the wording of the aforementioned conditions and rule.

The error was not detected for exchanges between MCC software provided by DG TAXUD in the past, because the same logic was applied. This logic was described in the call system in 2008 in the response to NA-FR, as follows:

*When a consignment has one destination but many consignees then*

- *the country of destination is only registered in header level and*
- *the multiple consignees are registered only into Goods items level*

*If the Country of Destination is only one, the **C140 prevails over the condition C002.***

*When several goods items are sent to the same Country of Destination (in EFTA), each to a different consignee trader, TRADER Consignee (box 8) data group cannot be used.*

*In this case, the condition **C002 prevails over the C001** and TRADER Consignee (ex box 8) data group is filled.*

*So, we can have the country destination code valued at the header level, and the trader consignee data group valued at the goods item level.*

From the historical synthesis, it seems obvious that this logic was not intuitive, and visibly not shared across all Europe.

The proposed update is based on the following analysis:

- a) DG TAXUD/A3 confirmed multiple times (including in [IM28393](#)), that the 'TRADER Consignee (box 8)' part of C001 should be treated as 'TRADER Consignee (box 8) or TRADER Consignee (ex box 8)'. I.e. if the country of destination is one of the contracting parties then the trader consignee is required at either HEADER (same consignee for all goods items) or GOODS ITEM level."
- b) The similar changes should be applied to the condition C002 applicable to the '(CONSIGNEE) TRADER' data group on the 'GOODS ITEM' level.
- c) In the context of improving those R&C, further proposal was made in order to amend the current wording and understanding of condition C030 (which caused various difficulties during the Conformance Testing for the new NCTS countries).
- d) Finally, the rules R010 & R011 could be more technical to avoid the regular rejections in Operations due to different interpretation of the concept of "SAME" consignor or "SAME" consignee. (See call open





by NA-FI - [INC1004.149083.38](#)).

*The only way to violate R010 is to declare the same trader at goods item level. How should this be verified? The following check is proposed:*

*IF TIN is declared (EORI or otherwise)  
THEN TIN cannot be identical for all goods items  
ELSE Name cannot be identical for all goods items*

*The same logic can be applied to R011. Please note that the case is applicable to ECS as well.*

Currently in Appendix Q2 of DDNTA v19.40 the following conditions-rules exist:

#### C030

IF there are different Contracting parties (see definition in C001) declared for Departure (identified by the Office of Departure, box C) and Destination (identified by the Office of Destination, box 53) or the country code of either Office of Departure or Destination is AD or SM  
THEN at least one "CUSTOMS OFFICE of Transit" (box 53) = "R"  
ELSE "CUSTOMS OFFICE of Transit" (box 53) = "O"

#### C140

IF only 1 Country of destination is declared  
THEN "Destination country (box 17a)" on Header level = "R"  
"Destination country (ex box 17a)" on GOODS ITEM level can not be used  
ELSE "Destination country (box 17a)" on Header level can not be used  
"Destination country (ex box 17a) GOODS ITEM level = "R".

#### R010

If the same Consignor/Exporter is declared for all goods items, the data group 'TRADER Consignor (box 2)'/ 'TRADER Exporter (box 2)' on TRANSIT OPERATION/EXPORT OPERATION/IMPORT OPERATION level is used. The data group 'TRADER Consignor (ex box 2)'/ 'TRADER Exporter (box 2)' on GOODS ITEM level can not be used.

This change will improve NCTS Phase4 operations (less rejections and higher quality of the data).

### **Proposed Changes (Functional)**

FTSS will be aligned to have the same Rules and Conditions proposed below for the DDNTA.

### **Proposed Changes (Technical)**

The proposed changes have the following objectives:

- to avoid any impact on the traders:**
- to improve the alignment of the NTA, by rephrasing the R& C, with no impact or very minimum impact on the logic of most countries:**
- to correct the errors observed in operations/during the CT (also in DG TAXUD's tools).**



1. The following changes will take place in Appendix Q2 of DDNTA v19.40 (the changes are highlighted, the removed text is stroked through):

1) The condition C001 will be corrected as follows:

**C001**

IF "Country of Destination" (box 17a) on HEADER level contains one of the Contracting Parties, or is AD or SM

THEN TRADER Consignee (box 8) = "R"

ELSE TRADER Consignee (box 8) = "O"

Contracting parties are:

The individual non EU common transit country and EU as a group.

IF 'HEADER.Country of destination code' in {CL009},

THEN

(' (CONSIGNEE) TRADER' = 'R'

OR

'GOODS ITEM.(CONSIGNEE) TRADER' = 'R' for all GOODS ITEMS)

ELSE

(' (CONSIGNEE) TRADER' = 'O' AND 'GOODS ITEM.(CONSIGNEE) TRADER' = 'O', unless other Rules & Conditions apply ).

With CL009 = all the countries with 'Country Regime' equal to 'EEC' OR 'TOC'.

2) The condition C002 will be corrected as follows:

**C002**

IF "Country of Destination" (ex box 17a) on GOODS ITEM level contains one of the Contracting Parties (see definition in C001), or is AD or SM

THEN TRADER Consignee (ex box 8) = "R"

ELSE TRADER Consignee (ex box 8) = "O"

IF 'GOODS ITEM.Country of destination code' in {CL009},

THEN

(' (CONSIGNEE) TRADER' = 'R'

OR

'GOODS ITEM.(CONSIGNEE) TRADER' = 'R' for all this GOOD ITEMS)

3) The technical rule TR0601 is always used in combination with C001 or C002. Therefore, it is proposed to remove TR0601.

**TR0601**

The country codes listed in C001 can be found in CL9

4) The condition C030 will be reworded as follows:

**C030**

IF there are different Contracting parties (see definition in C001) declared for Departure (identified by the Office of Departure, box C) and Destination (identified by the Office of

Destination, box 53) or the country code of either Office of Departure or Destination is AD or SM



THEN at least one "CUSTOMS OFFICE of Transit" (box 53) = "R"  
 ELSE "CUSTOMS OFFICE of Transit" (box 53) = "O"

**IF**  
 Country Code of '(DEPARTURE) CUSTOMS OFFICE.Reference Number' in {CL063}  
**OR**  
 Country Code of '(DESTINATION) CUSTOMS OFFICE.Reference Number' in {CL063}  
**THEN** '(TRANSIT) CUSTOMS OFFICE' = 'R'  
**ELSE**  
**IF** 'HEADER.Type of declaration' = 'TIR'  
**THEN** '(TRANSIT) CUSTOMS OFFICE' cannot be used  
**ELSE**  
**IF** 'HEADER.Type of declaration' in { 'T2', 'T-' }  
**THEN** '(TRANSIT) CUSTOMS OFFICE' = 'R'  
**ELSE** '(TRANSIT) CUSTOMS OFFICE' = 'O'

**IF** 'HEADER.Type of declaration' = 'TIR',  
**THEN** '(TRANSIT) CUSTOMS OFFICE' cannot be used,  
**ELSE**

**IF**  
 Country Code of '(DEPARTURE) CUSTOMS OFFICE.Reference Number' in {CL063}  
**OR**  
 Country Code of '(DESTINATION) CUSTOMS OFFICE.Reference Number' in {CL063}  
**OR**  
 'HEADER.Type of declaration' in { 'T2', 'T-' },  
**THEN** '(TRANSIT) CUSTOMS OFFICE' = 'R',  
**ELSE** '(TRANSIT) CUSTOMS OFFICE' = 'O'.

- 5) The rule **R902** is always used in combination with C030. Therefore, it is proposed to remove R902 from Appendix Q2.

**R902**  
 When "Declaration Type (box 1)" = 'TIR', CUSTOMS OFFICE of Transit cannot be used.

- 6) The technical rule **TR0630** will not be in use anymore and therefore it shall be removed.

**TR0630**  
 The different contracting parties can be found in CL138.

- 7) The condition **C140** will be reworded as follows:

**C140**  
 IF only 1 Country of destination is declared  
 THEN "Destination country (box 17a)" on Header level = "R"  
 "Destination country (ex box 17a)" on GOODS ITEM level can not be used  
 ELSE "Destination country (box 17a)" on Header level can not be used  
 "Destination country (ex box 17a) GOODS ITEM level = "R".

**IF** 'HEADER.Country of destination code' is used,  
**THEN** 'GOODS ITEM.Country of destination code' cannot be used (for every any GOODS ITEMS)  
**ELSE**





( ('GOODS ITEM.Country of destination code' = 'R' (for all GOODS ITEMS) )  
**AND**  
 (the same 'Country of destination code' cannot be used for all GOODS ITEMS) )

The messages on the Common Domain must be aligned, and therefore:

- **TR0601** will be removed from the messages CD001B, CD003B, CD012B, CD038B, CD050B, CD115B;
- **TR0630** will be removed from the messages CD001B, CD003B, CD012B<sup>1</sup>, CD038B, CD050B, CD115B;
- **R902** will be removed from the messages CD001B, CD003B, CD012B<sup>1</sup>, CD038B, CD050B (not present in CD115B).

For the External Domain messages, most National Project teams will likely consider these changes as documentary changes. It is recommended to verify and to correct if needed the following messages:

- For **C001/C002/C140**: CC013B, CC015B, CC029B, CC043A, CC051B;
- For **R010/R011**: CC013B, CC015B, CC017B, CC029B, CC043A, CC051B;
- For **R902/TR0630**: CC013B, CC015B, CC017B, CC029B, CC051B;
- For **TR0601**: CC013B, CC015B, CC029B, CC043A, CC051B.

**2. The following changes will take place in Appendix Q2 of DDNTA v19.40 and Appendix Q2 of DDNXA v10.30:**

1) The rule **R010** will be reworded as follows:

**R010**

If the same Consignor/Exporter is declared for all goods items, the data group 'TRADER Consignor (box 2)'/ 'TRADER Exporter (box 2)' on TRANSIT OPERATION/EXPORT OPERATION/IMPORT OPERATION level is used. The data group 'TRADER Consignor (ex box 2)'/ 'TRADER Exporter (box 2)' on GOODS ITEM level can not be used.

**NCTS:**

**IF** '(CONSIGNOR) TRADER' is used  
**THEN** 'GOODS ITEM.(CONSIGNOR) TRADER' cannot be used (for every any GOODS ITEMS)  
**ELSE**  
 ( ('GOODS ITEM.(CONSIGNOR) TRADER' = 'O')  
**AND**  
 (the same '(CONSIGNOR) TRADER' cannot be used for all GOODS ITEMS))

**ECS:**

**IF** '(EXPORTER) TRADER' is used  
**THEN** 'GOODS ITEM.(EXPORTER) TRADER' cannot be used (for every GOODS ITEMS)  
**ELSE**  
 ( ('GOODS ITEM.(EXPORTER) TRADER' = 'O')  
**AND**  
 (the same '(EXPORTER) TRADER' cannot be used for all GOODS ITEMS))

**Note**

To evaluate if two traders are identical, a case-sensitive comparison is performed between the strings CONCAT[Name;Street and number;Postal code; City;Country code;NAD LNG] of each TRADER at GOODS ITEM level (i.e. any differences in letter cases of two string means two different traders, as defined in DDCOM section 'Text fields').

2) The rule **R011** (applied in NCTS and ECS) will be reworded as follows:

<sup>1</sup> Note: the RFC-Proposal (665) suggests to remove the datagroup '(TRANSIT) CUSTOMS OFFICE' on which the R902 is applied.



### **R011**

When the same Consignee is declared for all goods items, the data group "TRADER Consignee (box 8)" on TRANSIT OPERATION/EXPORT OPERATION level is used. The data group "TRADER Consignee (ex box 8)" on GOODS ITEM level cannot be used.

**IF** '(CONSIGNEE) TRADER' is used

**THEN** 'GOODS ITEM.(CONSIGNEE) TRADER' cannot be used (for every any GOODS ITEMS)

**ELSE**

( ('GOODS ITEM.(CONSIGNEE) TRADER' = 'D' 'O') unless other Rules & Conditions apply  
**AND**

(the same '(CONSIGNEE) TRADER' cannot be used for all GOODS ITEMS) ).

### Note

To evaluate if two traders are identical, a case-sensitive comparison is performed between the strings CONCAT[Name;Street and number;Postal code; City;Country code;NAD LNG] of each TRADER at GOODS ITEM level (i.e. any differences in letter cases of two string means two different traders, as defined in DDCOM section 'Text fields').

### 3. The following changes will take place in Appendix X of DDNTA v19.40:

The Rule R902 and the Technical Rules TR0601 and TR0630 will be removed from the various XSD files.

The above changes will affect the DDNTA v19.40, the DDNXA v10.30.

### Proposed Changes (BPM Level1-Level4)

N/A

-

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

CS/RD2

With the phasing out of TR0630, the CL138 is no more required for NCTS.

### Related Changes in COM applications (For information only)

CTP/NCTS,  
STTA,  
TTA

The scenarios in CTP/NCTS will be adapted to take into account the merge of R902 and C030. STTA and TTA will be corrected for C001 and C002, and upgraded for the new C030 and the note for on R010 & R011 shall be implemented (two define two identical traders in a common way). The R902, TR0601 and TR0630 will be removed from the testing tools were needed.

### Risks


Risk of implementing (incl. Risk Level)	The purpose of the change is to improve the operations and the CT, with – in theory –no impact on the External Domain, and a very limited impact on the Common Domain. The validation using the updated rules and conditions (aligned to RFC-List.29) of the messages produced by an NTA aligned to RFC-List.28 should not cause regressions. Considering the need for a short window for implementation, and considering the importance of C001, C002, C140, R010 and R011 applied on important messages (IE001,...), the risk of implementing is considered as medium for NCTS, and low for ECS (clarifications of R010 would be documentary for most MS).
Mitigation actions	The changes should be applied by NTA in a very short time window (ideally the same week-end). A short (limited) Conformance Testing activity will be strongly recommended for all NA, to certify that the new NTA is again correctly aligned to these corrected common specifications.
Impact of not implementing	If the proposed changes are not implemented the conflict between the conditions C001, C002, C140, and R011 will still exist, with impact on the traders and National Service Desks (for rejections in operations) and on the National testing teams and DG TAXUD (for issues during the Conformance Testing). As explained in the Justification section above.



Document History			
Version	Status	Date	Comment
v0.01	Draft by CUSTDEV3	05/05/2016	<i>Sent to DG TAXUD for information.</i>
v0.02	Updated by DG TAXUD/A5	20/07/2016	<i>Draft for CAB@TAXUD</i>
v0.03	Updated by DG TAXUD/A5	08/08/2016	<i>Updated for CAB@TAXUD</i>
v0.10	NPM Review	10/08/2016	<i>Sent for NPM Review after CAB@TAXUD</i>
v1.00	Accepted	22/09/2016	<i>No comment to be implemented (see details in section 'Information about the NPM Review')</i>

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Review information
<ol style="list-style-type: none"><li>Review by NPMs from 10/08/2016 until <b>Friday 09/09/2016 COB</b>.</li><li>File also published on CIRCABC in the interest group « e-Customs IT aspects »: <a href="https://circabc.europa.eu/w/browse/a84670d1-e588-4860-8d88-38658f57ca9c">https://circabc.europa.eu/w/browse/a84670d1-e588-4860-8d88-38658f57ca9c</a>. → <a href="#">Library</a> &gt; <a href="#">01 Common NCTS ECS ICS</a> &gt; <a href="#">04 TECHNICAL SPECS</a> &gt; <a href="#">04 RFCs</a> &gt; <a href="#">11 RFC Proposals</a></li><li>Comments to be sent to: <a href="mailto:support@itsmtaxud.europa.eu">support@itsmtaxud.europa.eu</a> with cc to <a href="mailto:taxud.e-customs.technical-specs@ec.europa.eu">taxud.e-customs.technical-specs@ec.europa.eu</a>.</li></ol>

Information about the NPM Review
Comments/responses received from NA-CH, NA-DE(ECS&NCTS), NA-DK, NA-FI, NA-HR, NA-IT, NA-NL(ECS&NCTS), NA-NO, NA-PL, NA-PT, NA-RS and NA-SE. 'No Action' on 12 comments, 8 comments 'To Be Implemented' (from NA-DE) - <a href="#">See changes applied in track change on page 7-8-9-10</a> . Details in the embedded PDF file:  APO on (603)  APO published on <a href="#">CIRCABC</a> on 15/09/2016 and in SYNERGIA (cf. IM164245).

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