

Ocean Carrier Meeting with Italian Customs – September 2010:

Suggested Issues for Discussion

1. **Presentation and review of material and documentation made available by Italian Customs, including the implementation guide and associated dates**
2. **Specific questions**

2.1. Production System

- In the production system, will it be possible to connect to customs via FTP or AS2 or any other direct connection? The HTTP service described thus far is requesting the ocean carrier to upload the ENS on a website and search the response manually. If the above answer is positive, when will the Production connection channel details be made available from Customs and when will this connection be available physically for traders to connect?
It is already possible to connect via FTP.
- Which kind of document must be indicated in the "Istanza di adesione" to access the STD in order to be able to send messages ICS (ENS, etc.)?
For those who do not already have this type of authorization, it must be indicated "dicharazioni doganali" (customs declarations).

2.2. Messages

- What is the exact format of the messages (e.g. plain text)?
Plain text.
- What is the mode of exchange of the messages (plain ftp, http, X.400, AS2; dial-up connection over conventional phone line, etc.)?
Plain FTP with dial-up connection over conventional phone line or ISDN line (it is strongly recommended the use of ISDN).
- Which is the type of file to send messages within ICS?
The type "T" already in use for other customs declarations (B1, etc).
- Is there a requirement to send a "cancel" ENS message (the EU rules do not require such cancellation messages)?
An ENS can be cancelled, only by the customs office, when the time limit specified by Community legislation is expired. Currently it is 200 days from the date of registration of the ENS.
- Can a listing of required messages (MIG references like IE328, etc.) be provided?
All messages and information about project ICS are available in this section ICS-AIS: http://www.agenziadogane.it/wps/wcm/connect/ed/Servizi/ecustoms_it/ICS+AIS/
- Can samples of various error messages be provided?
In section ICS-AIS, folder Entry Summay declaration, there are three examples of ENS, with their Icntrl and Irisp. Also the list of errors has been published.

- In the response document (IE328 – MESSAGGIO IRISP ENS), the message looks just like an ENS. Will Customs send to the declarant the entire ENS in their response? Which field in the response message refers to the MRN#?

In response, the Electronic Customs Service sends a message ICNTRL that confirms the receipt of the message/declaration, containing the date, time processing and the number of messages processed. After processing the declaration, the system sends a reply message IRISP that contains (as file attached) the message IE328, foreseen by Community technical specifications, containing also the MRN (Movement Reference Number) and more and less the information of the ENS.

The MRN is also communicated to the Trader at Entry (Carrier) by the Customs Office if all of the following conditions are valid:

 - he is declared in the ENS and has a valid EORI TIN;
 - he is different from the Person lodging the ENS;
 - he is connected to the Italian EDI System.
- What are the benefits for AEO and special categories ?

Community specifications foresee that if a specific status (AEO) is declared, the system applies specific rules and conditions specified in the “rules and conditions” document, that is published on the web site.
- How will be treated non-Italian ENS ?

The non - Italian ENS can be indicated in the MMA and, when necessary, AIDA will send an information request to the Country that has generated the MRN.
- Can Italian customs provide examples of IRISP and ICNTRL sample messages? (on requesting these, traders were told these were not available; such sample message is however important to ensure that the traders' format matches the Italian Implementation guides using the delimiter 09 in ASCII code).

In section ICS-AIS, folder Entry Summary declaration, there are three examples of ENS, with their Icntrl and Irip. It is confirmed that the separator between each variable field is the horizontal tab (H-tab - ASCII “09” hexadecimal).
- IRISP includes the response function for IE316, IE328, IE304. The header format of IRISP is the same, but the response body format is different. Please advise what is the proper indicator to distinguish the function of IE316, IE328, IE304?

In the response it is indicated by T316, T328, etc.
- What is the LRN (Local Reference Number) ?

It is the reference number (field 7 of the message), assigned by the Economic Operator to the ENS, and may coincide with the "numero di pratica" field in the header of the message. The unique official number for Italian Customs to identify the idoc is the "numero di pratica" (field 5/6 of the header).
- The rejection message refers to a “reference number”. Does it refer to the declarant’s reference number (LRN) that is sent in the ENS, or is it Customs’ reference number?

It is the "numero di pratica" (field 5/6 of the header).
- NVO (Non-Vessel Operating Carrier, e.g. freight forwarder) is not mentioned in any of the documents. Will Customs provide a message that includes the NVO’s HOUSE Bill of Lading (BL), the corresponding ocean carrier’s master BL and the MRN Numbers?

The only information treated are the ones includes in the EU messages (ENS – IE315 message).

- The ENS must be submitted to the Customs Electronic System (STD). STD checks the ENS message. Once validated, the ENS is stored in the Italian Customs System AIDA resulting in MRN numbers. STD reverts with 2 messages: (a) acknowledgement receipt ENS and (b) release of the MRN #. There is no reference to *rejection* response messages in the Customs electronic system (STD).

The *rejection* response messages are shown in the user manuals for and are published in the web site in each section (e.g. for ENS see IE316 “respinta” (that means *rejection*)).

- An ENS may cover one shipment or multiple shipments. In case of a rejection, should it be assumed that the entire ENS message is rejected?
In case of a rejection, the entire ENS message is rejected: it is possible to modify or cancel the wrong lines “ENS1” and lodge again the ENS.

2.3. Amendments

- Amendment of ENS: Three options are listed (“modify”, “create” and “cancel”). Will Customs accept a “replace” of the entire ENS?
If you send an amendment of an ENS the Italian EDI treats the amendment as a “new” ENS but there is the link to the previous MRN as foreseen by “rules and conditions”.
Cancellation is not permitted. It will expire after XXX days.

2.4. Diversions

- Please confirm that ocean carriers will have full discretion to use the “Entry Key” instead of having to provide MRNs.
Full discretion but the “Entry Key” is strongly recommended.
- STD will revert with two messages: (a) acknowledgment of receipt of the diversion request and (b) confirmation of acceptance of the diversion. Message (b) is only transmitted in case a vessel diverts to an EU port which is not part of the ENS vessel routing. We do not understand this limitation for message (b) -- by definition, a diversion request must be lodged when the actual first port of call is in a Member State not listed in the original ENS.
Confirms that diversion request must be lodged only when the actual first office of entry is situated in a Member State not listed in the original ENS route.
- There is no reference to any rejection response messages. Is no rejection response message foreseen?
The rejection response messages of diversion is IE324.

2.5. Arrival notification

- Arrival Notification: will this be a separate message or be included in the import manifest? Are EDI specifications on arrival notifications available, and where?
Italy will be used arrival manifest (MMA ver. 4.1) as arrival notification, from 1st January 2011. All information about MMA are available on this link:
<http://www.agenziadogane.it/wps/wcm/connect/ed/Servizi/AIDA/>

General speaking, the subject who lodges the ENS don't need to lodge Arrival Notification, because the arrival manifest (MMA v. 4.1) is also the Arrival Notification. Nowadays (and from 2003) a representative of the capitan/shipping company/carrier lodges the MMA.

- Please confirm that ocean carriers will have full discretion to use the “Entry Key” instead of having to provide MRNs.

Concerning more specifically the import manifest: Italy has requested that some elements of the ENS (e.g. MRNs) should be included in the import manifest. Are these 2 processes linked? Will customs cross check data between the ENS and the import manifest (or is this set for integration at a later stage?)

In the section “general data” of the MMA (version 4.1, available in the training environment from the 1st July) it will be mandatory to include the “entry key” of the mean of transport (IMO / flight number, etc.), in order to identify the ENS associated with it.

The references of the entry summary declarations (MRN - ITEM NUMBER) are requested for the goods that must be unloaded, and submitted for Temporary Storage. In this way the MMA will perform the following functions / processes:

1. Arrival Notification (AN)
 2. Presentation Notification (PN)
 3. Summary Declaration for Temporary Storage (SDTS)
- without further formalities for traders.

Customs Agency performs the necessary controls to cross check data.

- How to send the Arrival Notification ?

The data elements of the Arrival Notification are included in the MMA, and therefore for customs purposes shall not be sent a new message.

3. Testing

- When will the Italian test environment be ready?

Since 6th July 2010

- Is there any limitation to the data that can be sent or received during the test? (some Member States have declared that they can only accept codes for particular vessels or locations)

In testing and in real environment, you can send more ENS in one file IDOC, whose maximum size must be 4 megabytes. The list of the office for the test are shown on the web site.

- Will Italian Customs be able to send all types of response (incl. IE 351 with risk types A, B and C) during tests?

Some messages IE351 may be sent to operators, randomly, in order to carry out full testing. If necessary (on request) it will be possible to ask for a specific case of IE351, that is not possible to test.

4. Further Customs support and communications between ocean carriers and Customs

- How will support be provided from now on, including after live system implementation (e.g. limitations on the dates/times during which Customs will be available for support)? What is the preferred channel/format for raising issues found during test or live system implementation? How do Customs generally see the test and live system implementation being conducted?

For the moment the contact points is the mail box dogane.ecustoms@agenziadogane.it .

In the future will be published the available alternatives for the helpdesk system.

5. Fall back plans in case Italian Customs system is not functioning

In case of containerized cargo (long route) the ENS has to be lodged 24h prior the loading, in this case it is possible to send again the message at the end of unavailability period. The Customs will perform as soon as possible the analysis in respect of 24h rules.

The fallback procedure foreseen that the ENS might be presented on a mass storage (USB keys, CD-ROMs,...) by a contact person.

6. Do Not Load messages (DNL)

- Impact of the interpretation of the consignor/consignee data elements in the issuance of DNL
Italy will apply the same rules applied in the other 26 MS.
- IE351 (Risk types A, B and C):
Process and system-wise, can a DNL message be removed? If yes, what is the procedure? Are there different procedures for Risk Type A (Do not load), Type B (Hold at arrival) and Type C (Hold at discharge)?
The DNL cannot be removed and you cannot amend the ENS after receiving it. You can send a new ENS for this shipments, when the first ENS contained data clearly incorrect (eg. a wrong country code,.....). A new risk analysis will be performed according new information.