

Distr.: General
14 February 2019

Original: English only

Economic Commission for Europe

Inland Transport Committee

Working Party on Road Transport

**Group of Experts on European Agreement Concerning Work of
Crews of Vehicles Engaged in International Road Transport (AETR)**

Twentieth session

Geneva, 18 February 2019

Item 5 of the provisional agenda

Annex 1C

Submitted by the Russian Federation

This document in English, submitted by the Russian Federation, contains general comments on the text of draft Annex 1C.

General comments on the text of the draft Annex 1C

1. The current edition of the Annex 1C to the regulations 2016/799 does not correspond with the draft text of the Annex 1C to the AETR due to the amendments to the regulations - Regulation of 02/28/2018 (EU) 2018/502.
2. In the draft text of the Appendix 1C there is no clear definition of the term “smart tachograph”.
3. The text 1C uses different terms for the tachograph (control devices, recording equipment). This complicates the perception of the text of the document.
4. The numbering of the sections in the Russian and English versions does not match each other. For example, in the Russian version - section 4. In the English version - section 3. Need to align.
5. Numbers of requirements numbers indicated on the left from the text in the Russian and English versions do not correspond. For example, in the Russian version - requirement 227, in the English version - requirement 229. Need to align.
6. Instead of the term “Member State” it is proposed to use the term “contracting party” throughout the text (in both Russian and English versions).
7. In the English version of the draft Appendix 1C, it is proposed to use the term “Control device” instead of the term “Record equipment”. The term “Control device” is defined in Article 10 of the AETR.
8. It is proposed to exclude references to EU regulations. We offer to refer to a similar document, ratified by the Russian Federation. In the absence of such documents, we propose to load the text of these regulations into 1C text.
9. In both the English and Russian versions of Appendix 1C, only distinctive signs of countries of the European Union member states are mentioned and distinctive signs of the countries of the AETR contracting parties are missing (paragraph 3.1, paragraph 231 of the English version, paragraph 4.1, paragraph 229 of the Russian version of the text).