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Economic Commission for Europe

Inland Transport Committee

Working Party on Road Transport

Group of Experts on the Operationalization of eCMR

Fourth session

Geneva, 25-27 January 2023

Item 3 (a) of the provisional agenda

Programme of work

**Comments relating to the proposed concepts and processes of
the future eCMR system**

Submitted by the Islamic Republic of Iran

This informal document contains comments submitted by the Islamic Republic of Iran in relation to the discussion of the Group of Experts at its fourth session.

Proposed items to be discussed in the meeting for resuming eCMR system:

1. The entities as contracting parties to the eCMR Protocol, including the sender, carrier and receiving agent, to be approved according to the national legislations.
2. The States as Contracting Parties to the eCMR, will embrace the approval of the contracting parties.
3. The eCMR database will be integrated with due data banks, accumulating other transport documents.
4. The United Nations competent authorities will propose the eCMR operational standards.
5. The software systems as well solutions proposed in expert level, shall be subject to verification by due state authorities prior to announcement by the governments.
6. Any material breach in the content of eCMR Convention and Protocol, is not agreed upon.
7. The eCMR Convention as well as Protocol may not be considered as Customs Conventions, but rather seem specifically governed by private sector regulations. To give an estimate, although in certain countries, customs authorities claim for CMR or eCMR copies, such requirement can be addressed based on national legislators and not legally cited in the text of the convention.
8. The required additional information, approval mechanism and proposed supplementary provisions do not comply with the requirements of CMR as well as eCMR Conventions. Suggested items to continue system activity
9. The eCMR data to be corresponding to the CMR paper documents, enabling fully exchange between stakeholders.
10. Any proposed procedures may avoid increasing the cost or disrupting the transport operations, thus the int'l transport companies to be still considered as final decisions maker in terms of expenditures or service type.
11. There seems no need for centralized data in any circumscribed form, which not only would not benefit trade or transport operators, but also shall greatly increases the possibility of certain misuses.
