Transmitted by the representative of the Russian Federation

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CONCERNING THE EXISTING PRACTICE OF DEVELOPMENT OF AMENDMENTS TO THE UNECE REGULATIONS AND THE WAYS OF ITS IMPROVEMENT

At the present time the existing practice of development of technical provisions in regards to the new objects of regulating is formulization of them in the form of amendments to the already existing UNECE Regulations, which do not directly refer to the scope of such Regulations, as it was planned at the time of their development.

In this connection one could note the provisions for tyre pressure monitoring systems (TPMS), which are planned to be included in the form of amendments to the Regulation No. 64. Such provisions, as well, include the provisions for electronic stability control systems (ESC) incorporated into the Regulations Nos. 13 and 13-H, although those systems are not intended for improvement of the braking performance, which is the object of regulating by the Regulations Nos. 13 and 13-H. The 01 series of amendments related to the wet grip tyre performance were incorporated into the Regulation No.117 that initially regulates tyre noise.

Although the WP.29 experts are acknowledged of the motivation of the introduction of the new provisions in the form of amendments to the existing Regulations, the Russian Federation assumes that such a practice complicates the UNECE Regulations, renders more difficulty with their application and in certain cases could be the reason of rejection from application of such Regulations by any of the Contracting Parties to the 1958 Geneva Agreement.

In this regard the Russian Federation considers that such an introduction of new provisions is a temporary practice, and, over the strategic long term, such new provisions will be adopted as new UNECE Regulations.

The corresponding proposals on restructuring the specific Regulations can be presented by the Russian Federation.
