PAPERLESS DATA AND DOCUMENT EXCHANGE IN THE CROSS-BORDER TRANSPORT OF SPECIFIC GOODS BETWEEN THE EURASIAN ECONOMIC UNION AND THE EUROPEAN UNION

Project report

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Disclaimer: this report was prepared by Mr. Konstantin Stogov, UNECE consultant as part of the work on trade and transport connectivity during the pandemic. The views in this document are those of the author and do not necessarily express the position of the UNECE.

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List of abbreviations

UNECE – United Nations Economic Commission for Europe

UN/CEFACT – United Nations Centre for Trade Facilitation and Electronic Business, a subsidiary body of the UNECE

MMT RDM - Multimodal Transport Reference Data Model of UN/CEFACT

EAEU - Eurasian Economic Union

EOMI – the Eurasian Open Integration Model

UAIS CA - Unified Automated Information System of Customs Authorities

FCS of Russia - Federal Customs Service of Russian Federation

Abstract

In the context of the recovery from the COVID-19 pandemic and the general direction of building back better this project aims to develop and practically test paperless data and document exchange in the cross-border transport of specific goods between the Eurasian Economic Union and the European Union.

Focusing on a specific pilot case of multimodal delivery of goods author of this study conducted research and offered practical recommendations how to align used by different participants in the supply chain in their IT systems to the UN/CEFACT standards and Multimodal Transport Reference Data Model, allowing for a seamless exchange of electronic data and documents (B2B exchange), as well as developing electronic B2G documents for submission to regulatory authorities.

Main results of the study:

1. Based on a specific example of exports/imports of specific goods, demonstrated the opportunities and benefits of using the UN/CEFACT Multimodal Transport Reference Data Model (MMT RDM).

2. Explored what electronic documents and data exchange systems are used in multimodal transport by participants in the supply chain, based on a particular product. Examined on what data model the existing electronic document systems are built.

3. Carried out data mapping between the standards for electronic data and documents recommended by UN/CEFACT and electronic documents used by participants in the supply chain in their IT systems.

4. Carried out data mapping from the specific documents to be developed and used in the pilot project to the reference data models of UN/CEFACT (notably, the MMT RDM) and the data model of the Eurasian Economic Union (EOMI – the Eurasian open integration model, used in the EAEU for B2G electronic document exchange).

5. Suggested ways and recommendations to provide seamless B2B and B2G data and document exchange based on a data converter using the harmonized and standardized UN/CEFACT data model.

Chapter 1: Opportunities and benefits of using the UN/CEFACT Multimodal Transport Data Reference Model (MMT RDM) and electronic document equivalents on the example of multimodal delivery of goods

1.1 Definition of the pilot project zone: multimodal delivery of goods from the European Union to Moscow via Kaliningrad

Let us consider the selected pilot zone.

This zone includes:

Route of delivery of the consignment (type of goods - polyethylene terephthalate) by automobile transport from Italy through European Union to Kaliningrad region of Russian Federation.

Not later than 2 hours before the arrival of the consignment of goods to the customs territory of the Eurasian Economic Union (hereinafter – EAEU) (Kaliningrad region) pre-arrival information must be submitted to the customs authorities (see Annex No. 1). Once the vehicle arrives at the border, a customs transit declaration (see Appendix No. 2) is submitted to place the goods under the customs transit procedure and the goods. After that the goods under the customs transit procedure are sent to Kaliningrad, where the goods are placed in the customs control zone, where the customs transit procedure is completed and the goods declaration (see Annex No. 3) is filed to place the goods under the customs procedure of release for domestic consumption.

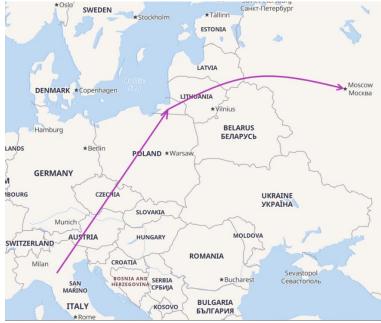
2. The route of delivery of the consignment by rail from the Kaliningrad region to the Bely Rast terminal (Moscow) through the territory of the EU.

A container with goods released under the domestic consumption procedure is reloaded onto rail transport to send it to Bely Rast station under the customs procedure of customs Kaliningrad transit. The customs procedure of Kaliningrad transit is designed for the movement under customs control of EAEU goods from/in the Kaliningrad region of the Russian Federation to the rest of the Russian Federation through the territory of third countries.

Kaliningrad transit is opened by the customs authorities from the station of export of EAEU goods from the customs territory of the Russian Federation to the station of import of EAEU goods into the territory of the Russian Federation. Similarly, to the arrival of goods to the Kaliningrad region from the European Union, prior to the arrival of goods under the Kaliningrad transit procedure to the customs territory of the EAEU from the Baltic states, it is also required to submit pre-arrival information to the customs authorities. At the station where the EAEU goods enter the territory of the Russian Federation (Sebezh station, Oktyabrskaya railroad, JSC Russian Railways) the customs procedure of Kaliningrad transit is completed by the customs authorities and the container is sent to the destination station Bely Rast (Moscow railroad, JSC Russian Railways).

At the Bely Rast TLC, the container with the goods is reloaded onto a road vehicle for delivery at the "last mile" to the consignee's address.

Figure 1: Route map of the pilot project



Source: authors.

1.2 Description of the set of shipping documents (TSD) for multimodal transport

Transportation of goods by the above route requires the preparation of a set of transport and shipping documents.

When shipping goods, regardless of the type of goods, the seller prepares a commercial invoice and packing list.

The commercial invoice (see appendix number 4) usually contains a list of goods and services, their quantity and price at which they are delivered to the buyer, the formal features of the goods (articles, nomenclature codes), delivery terms, tax charges, discounts provided and information about the sender and recipient of goods.

The packing list (see Appendix No. 5) contains important information about the contents of the package and its characteristics. This includes a description of the shipping carton, the number of pieces in each box, additional units of measure of the goods, the net weight and gross weight of the goods, etc. Simply speaking, the packing list helps the consignee and the customs authorities controlling the movement of goods without opening the package and knowing what it contains and in what quantity.

Other documents may also be attached to the consignment. The list of these documents will depend on the type of goods, the applied to it tariff and non-tariff measures of regulation of its entry into the customs territory of the Russian Federation, its destination, etc.

To accept the goods for transportation the carrier issues a CMR waybill (see Appendix N_{2} 7).

Then, as described above, no later than 2 hours before the arrival of the vehicle with the goods to the Kaliningrad region, pre-arrival information about the consignment of goods is submitted to the customs authorities of the border checkpoint.

After the arrival of the vehicle at the border crossing point, the customs transit procedure to Kaliningrad is opened. When applying to the customs authorities of the customs transit procedure, the following documents shall be submitted to the customs authorities together with the transit declaration:

- Documents confirming the authority of the person submitting the transit declaration, such as a certificate of the customs representative, a power of attorney for the declarant. (see Annex No. 6)

- Passport of the declarant;

- CMR waybill (see appendix № 7);

- Commercial Invoice;

- Packing list;

- Certificate of admittance of the international transport vehicle for transportation of goods under customs seals and stamps; (see Annex No. 8)

- Other documents depending on the type of goods (phytosanitary certificate, military import license, veterinary certificate, quality certificate, etc.).

After the opening of the customs transit procedure the goods are sent to Kaliningrad, where they are placed in a temporary storage warehouse, after which the declaration of goods for placing the goods under the customs procedure of release for domestic consumption is submitted.

Together with the declaration of goods the following documents are submitted:

- documents confirming the authority of the person submitting the goods declaration;

- Passport of the declarant;

- contract;

- appendixes to the contract;

- commercial invoice;

- CMR waybill;

- packing list;

- invoice for payment for the goods (if payment is made before the goods declaration is submitted);

- freight bill (if payment is made before the goods declaration is submitted);

- transport contract;

- insurance bill (if the goods are insured)

- approval documents (declaration of conformity, certificate of conformity, certificate of state registration of the product);

- Other documents depending on the type of goods.

To carry out the above-mentioned customs procedures it is required to have the maximum set of shipping documents. For the subsequent transportation of the container from the Kaliningrad region to the Bely Rast TLC by rail, an SMGS railroad bill of lading will be issued, which is submitted to the customs authorities in a set with other shipping documents for placing the goods under the customs procedure of Kaliningrad transit.

1.3 Description of international regulatory requirements and normative legal acts of the EAEU and Russia, which regulate pilot supply

Normative legal acts regulating pilot delivery:

(a) - "International Convention on the Simplification and Harmonization of Customs Procedures" (made in Kyoto on 18.05.1973) (as revised by the Protocol of 26.06.1999);

This convention aims at facilitating international trade while preserving the effectiveness of customs controls.

The Convention has the following objectives:

- The implementation of programs aimed at the continuous improvement and efficiency of customs rules and procedures;

- Predictability, consistency and transparency in the application of Customs rules and procedures;

- providing interested parties with all necessary information concerning laws, regulations and administrative acts on customs affairs, customs rules and procedures;

- The application of modern working methods such as risk management and audit techniques and the maximum practical use of information technology;

- Cooperation with other national authorities, foreign Customs administrations and the trade community wherever necessary;

- Adoption of appropriate international standards;

- Ensuring unhindered access of interested parties to administrative and judicial review procedures.

The Convention does not contain requirements for the composition of data elements, but makes a significant contribution to the development of electronic forms of interaction between traders and customs authorities, as it provides for provisions on the use of modern technology in all customs operations, where possible.

(b) - Agreement on International Goods Transport by Rail (SMGS) (as amended and supplemented on 01.07.2021) (together with the "Rules of Goods Carriage", "Rules for Dangerous Goods Carriage", "Technical Conditions of Accommodation and Fastening of Goods", "Rules for Carriage of Wagon Not Owned by Carrier as a Vehicle";)

The agreement establishes the procedure for accepting cargo for transportation and delivery to the recipient, the procedure for concluding the contract of carriage, the commercial details of the railway consignment note, the terms of delivery, the rules of transportation of goods under special conditions (long, dangerous, chemical, heavyweight, perishable, livestock).

The SMGS consignment note is based on Article 6 § 11 SMGS and Article 7 § 15 SMGS. The CIM/SMGS consignment note manual (SMGS Appendix 6 as at 1 July 2021) contains provisions for the use of the electronic SMGS consignment note.

(c) - "Convention on the Contract for the International Carriage of Goods by Road (CMR)" (concluded at Geneva on 19.05.1956) (entered into force for the USSR on 01.12.1983) (as amended on 05.07.1978);

Convention provides, that the contract of carriage of goods by automobile transport must be confirmed by the consignment note - CMR. The CMR waybill is issued in three copies: the first copy is handed over to the sender, the second is attached to the goods, and the third is retained by the carrier. The waybill is not a negotiable document and document of title.

In February 2008 the Convention on the Contract for the International Carriage of Goods by Road was supplemented by a protocol, which offered electronic management of CMR through e-CMR. This protocol entered into force on 5 June 2011. The protocol enabled the digitization of cross-border carriage of goods by road. A special feature of the e-CMR Protocol is that it does not provide a unified system for the issuance and control of electronic consignment notes in the same way as the eTIR system does.

(d) - "The Customs Code of the Eurasian Economic Union" (ed. on 29.05.2019) (Annex N 1 to the Treaty on the Customs Code of the Eurasian Economic Union);

The Customs Code regulates relations arising in connection with the movement of goods across the customs border of the Eurasian Economic Union.

The EAEU Customs Code has laid a broad foundation for the introduction of information technology in customs authorities and the provision of information interaction with traders. For example, the document establishes important "single window" principles, i.e. single submission of documents and interdepartmental information exchange. The Customs Code also provides for the possibility of customs operations without the participation of customs officials, which allows the introduction of technologies for automatic registration of the declaration of goods and the automatic release of goods.

(e) - Order of the Ministry of Finance of the Russian Federation dated 30.08.2016 N 144n "On Approval of the Procedure for the use of the Unified Automated Information System of Customs Authorities during customs control, customs declaration and release (refusal to release) of goods placed under the customs procedure of customs transit in electronic form". (Registered with the Russian Ministry of Justice on 16.12.2016 N 44758);

As follows from the title of the document, it contains the procedure for using the Unified Automated Information System of Customs Authorities (hereinafter -UAIS CA). The UAIS CA meets the needs of customs authorities in the intradepartmental and interdepartmental information exchange. UAIS CA comprises a set of departmental information systems, services, data bus, data storage and transmission infrastructure.

The customs declaration of goods in the Russian Federation is carried out electronically via the Internet through the service, which is available in the personal office of traders, as well as through integration with software products that are used by declarants.

The FCS of Russia publishes and maintains a data model that describes the formats and structures of all electronic documents required to declare goods.

(f) - Federal law "On customs regulation in the Russian Federation and on amendments to certain legislative acts of the Russian Federation" from 03.08.2018 N 289-FZ (latest version);

The purposes of this Federal Law are:

1) ensuring the implementation of international treaties of the Russian Federation and other acts constituting the law of the Eurasian Economic Union (hereinafter - the Union);

2) ensuring economic security of the Russian Federation in carrying out foreign trade in goods;

3) ensuring the rights and legitimate interests of persons engaged in activities related to the importation of goods into the Russian Federation and exportation of goods from the Russian Federation, persons engaged in activities in the field of customs, as well as other persons exercising the rights of ownership, use and disposal of goods imported into the Russian Federation and goods exported from the Russian Federation;

4) creation of conditions for the development of foreign economic activity and foreign trade activities, customs infrastructure.

The above federal law is a supplement to the EAEU Customs Code and is necessary to regulate the provisions of the customs legislation, which are referred to the national level. In particular, this law contains provisions on the maintenance and development of the UAIS CA.

(g) - Order of the Federal Customs Service of Russia from 18.03.2019 Ne 444 "On approval of the procedure for performing customs operations when placing goods in a temporary storage warehouse and other places for temporary storage, when storing and issuing goods, the order of registration of documents submitted for placing goods in temporary storage and issuing confirmation of registration documents, the order of issuing (refusal to issue) permission to conduct the operations specified in paragraph 2 of Article 102 of the Customs Code of the Eurasian Economic Union, determining the Terms and Order of issue (cancellation) permission

This order establishes the procedure for customs operations during the placement of goods in a temporary storage warehouse.

Customs authorities and the owners of temporary storage warehouses are in constant information exchange through the use of special software that is linked with the UAIS CA. Information on goods placed in a temporary storage warehouse is transmitted to customs authorities via electronic channels, while information on goods released by customs authorities is transmitted in the opposite direction.

(h) - Order of the Ministry of Transport of Russia from 07.12.2016 N 374 "On approval of the Rules of acceptance of cargo, empty freight cars for transportation by rail" (Registered in the Ministry of Justice of Russia 21.03.2017 N 46054)

This order approves the rules of acceptance of cargo, empty freight cars for transportation by rail.

This order does not contain provisions on the digitization of business processes.

1.4 Comparison of available paper consignment documents with available document equivalents, for this pilot project using MMT RDM

Table 1: Comparison of consignment documents by batch with available document equivalents, for this pilot project using MMT RDM

UN/CH https:// CIM/SMGS waybill There recomm https:// standar	is a mapping document available on the EFACT website: /unttc.org/documents/ecmr-standard-package is an equivalent electronic document mended by UN/CEFACT: /unttc.org/documents/smgs-consignment-note- rd-package is a mapping document on the UN/CEFACT
https:// CIM/SMGS waybill There recomm https:// standar	Yunttc.org/documents/ecmr-standard-package is an equivalent electronic document mended by UN/CEFACT: Yunttc.org/documents/smgs-consignment-note- rd-package is a mapping document on the UN/CEFACT
CIM/SMGS waybill There recommunity the standard	is an equivalent electronic document mended by UN/CEFACT: /unttc.org/documents/smgs-consignment-note- rd-package is a mapping document on the UN/CEFACT
recomm https:// standar	mended by UN/CEFACT: /unttc.org/documents/smgs-consignment-note- rd-package is a mapping document on the UN/CEFACT
https:// standar	funttc.org/documents/smgs-consignment-note- rd-package is a mapping document on the UN/CEFACT
standa	rd-package is a mapping document on the UN/CEFACT
	is a mapping document on the UN/CEFACT
Commercial Invoice There	
websit	e: https://unttc.org/documents/standardized-
	-aligned-international-standards-and-
uncefa	ct-reference-data-models
-	EFACT website has a mapping of the
	ent: https://unttc.org/documents/standardized-
	-aligned-international-standards-and-
	ct-reference-data-models
Certificate of admittance of a vehicle for No doe	cument available on the UN/CEFACT website
international carriage of goods under customs	
seals and stamps	
Contract No doo	cument available on the UN/CEFACT website
Invoice for payment (insurance, carriage) No doe	cument available on the UN/CEFACT website
Transportation agreement No doo	cument available on the UN/CEFACT website

Source: authors

It can be concluded that not all shipping documents have equivalents recommended by UN/CEFACT. At the same time, the key transport documents (CMR, railway bill of lading, invoice and packing list) are already provided, which

allows the implementation of electronic information exchange between the participants of international transport.

1.5 Opportunities and Benefits of Using the UN/CEFACT Multimodal Transport Reference Data Model (MMT RDM)

The use of reference data models allows standardization of data requirements, as well as the consolidation of definitions and data presentation formats used by the business community. Clear definitions allow for more accurate recognition of data element types. Clear formats and a data sharing reference structure help provide accurate data. It helps to leverage better data within business processes and reduce the risk of errors, reducing costs and delays as well. It ensures data interoperability between different participants, which further simplifies trading procedures.

The reference data model also simplifies and harmonizes the semantic meaning of trade data (their names, definitions and codification) and meets the requirements of data exchange structures in a standard format, which can significantly contribute to reducing the time and costs of international trade transactions. The harmonization of trade data exchange and presentation in line with international standards guarantees data compatibility and prevents inconsistencies in the workflow of different international traders.

In addition, the data reference model complements the Single Window environment when consolidating information into a Single Window by creating business information exchange structures in a standard format that can meet all regulatory requirements for imports, exports and transit, while avoiding data redundancy and duplication of registration and information exchange processes.

The reference data model contains examples of unified export documents, which simplifies document preparation by unifying them.

It should be noted that the reference data model has a hierarchical organization. Thanks to this hierarchical organization, it is possible to use an approach in which data exchange is defined by a process (or event) and there is no need to consider information only in the context of data exchange on paper.

A segment of the UN/CEFACT data reference model's code list can be used to describe a data element. Using existing standard code lists avoids having to display different codes from different code lists for the same data element when implementing UN/CEFACT standards. Subgroups of code lists are published as unrestricted and restricted code lists.

The reference data model can serve as a basis for the development of data exchange systems. It outlines a semantic standard (data definitions) that program developers in the field of trade information exchange can take as a basis for the development of new information systems. If all the information systems used in the value chain use the same set of standardized data criteria and semantic rules, they can uniformly recognize transmitted data and automatically process it to achieve the intended business process objectives.

Chapter 2: Electronic Documents and Data Exchange Systems Used in Multimodal Transportation by Product-Specific Supply Chain Participants

2.1 Analysis of available information systems and electronic versions of documents by supply chain participants in the pilot project

Table 2: Information systems used by traders to automate their work

Participants from business	Work automation tools
Consignor	ERP system;
	CRM-system;
	Tools for working with documents (Microsoft office);
	E-mail;
	Messengers.
Carrier	E-mail;
	Tools for working with documents (Microsoft office);
	Messengers;
Forwarder	ERP-system;
	CRM-system;
	Tools for working with documents (Microsoft office);
	E-mail;
	Messengers
WAREHOUSE	ERP-system;
	Email;
	Tools for working with documents (Microsoft office);
	Messengers
Customs broker	ERP-system;
	CRM-system;
	Personal Cabinet of the FCS of Russia;
	Programs for submission of customs declarations (Alta
	Customs Cargo Declaration, VED-Declarant, Declarant,
	Kontur.Declarant, etc.)
	Tools for working with documents (Microsoft office);
	E-mail;
	Messengers
Consignee	ERP-system;
	CRM-system
	Tools for working with documents (Microsoft office);
	E-mail;
	Messengers.

Source: authors

Separately, it should be noted that senders, recipients, carriers and freight forwarders most often use a minimum of means to automate their activities. As a rule, it is: e-mail, messengers and means of working with documents.

In some large companies implemented ERP-systems, that is corporate information system designed to automate accounting and management. Among the modules of such systems there are modules responsible for on-line accounting of vehicles movement, traffic routes, tariffs, etc. Another module worth mentioning is the module of operational accounting of goods at the temporary storage warehouse at terminals. In addition, many companies have implemented CRM-systems that can automate interaction with customers, establish a system of notification about the presence of the goods shipment and its status. However, such systems, along with e-mail, involve the exchange of scanned or pdf copies of documents, rather than a full-fledged information exchange of messages.

2.2 Analysis of available solutions and data models from government agencies that are participants in the supply chain in the pilot project

Government agency	Work automation tools
Border Service of the Federal Security	Departmental e-mail;
Service of Russia	System of interagency electronic interaction;
	System of electronic document management;
	Subsystem of automated control of machine-
	readable passport and visa documents (PAC
	MSPV, AIS "Cascade");
	AIS "Potok";
	etc.
Federal Customs Service of Russia	Departmental e-mail;
	System of interagency electronic interaction;
	Electronic document management system;
	Unified integrated customs information
	network:
	APS "Checkpoint"
	CPS "Transit operations"; CPS "Post control
	CPS "Post-Control";
	"AIST-M";
	"ASTO-Analysis"
	etc.
Rostransnadzor	Departmental electronic mail;
	System of interdepartmental electronic
	interaction;
	Electronic Document Management System;
	Rostransnadzor's UAIS;
	AC "Monitoring";
	And others.

Table 3: Information systems used by government agencies to automate their work

Source: authors.

Unified Automated Information System (UAIS) of customs authorities is a protected territorial distributed information system of customs authorities of the Russian Federation. Functions of UAIS are automation of customs authorities' activities, analytical support of officials. UAIS unites all customs authorities of the Russian Federation in a unified information system.

Access to the UAIS resources is available exclusively for customs officials and organizations subordinate to the FCS of Russia. Information interaction with interested parties and government authorities and other information systems via the UAIS services is carried out via the Customs Authorities Automated External Access System.

Information interaction with traders is carried out¹:

- Using electronic documents by means of the Personal Cabinet of traders;

- using information systems designed for the submission by traders of information to customs authorities in electronic form using public information and computer networks (including the Internet) - regulated by Order of the FCS of Russia from January 24, 2008 No 52 "On implementation of information technology for submission to customs authorities' data in electronic form for customs clearance of goods, including the use of Internet".

All actions of customs officials and trasers shall be completed with the execution of an electronic document of legal significance. When sending electronic documents to customs authorities, an enhanced qualified electronic signature is used. According to Article 6 of the Federal Law of the Russian Federation N_{D} 63-FZ "On electronic signature" an electronic document signed with an enhanced qualified electronic signature is equivalent to a document on paper, signed by an authorized person and stamped.

The FCS of Russia issues key certificates of electronic signature verification (Certificates) free of charge. In accordance with the Order of the FCS of Russia from October 25, 2011 No 2187 "On Approval of the Use of traders and persons engaged in activities in the field of customs, the electronic signature means when implementing information exchange with customs authorities of the Russian Federation.

The customs authorities of Russia are connected to the System of Interagency Electronic Interaction (SIIEI). The SIIEI is a federal state information system which includes information databases, including data on the software and technical means used by agencies and organizations to enable access through the interaction system to their information systems, on the software and technical means that ensure a single documented way of interaction of information systems

¹ https://customs.gov.ru/gosudarstvennye-informaczionnye-sis/opisanie-uslovij-i-poryadka-dostupa

of agencies and organizations through the technology of electronic message queues that ensure interaction².

² System of Interagency Electronic Interaction https://digital.gov.ru/ru/activity/directions/49/

Chapter 3: Mapping data from specific documents developed and used in the pilot project to the UN/CEFACT reference data models (in particular, the MMT RDM) and the Federal Customs Service data model

3.1 Mapping of data from B2B documents for transit declaration

In this study, we performed the determination of information correspondence (mapping) between the data (mapping) of paper transport and shipping documents of the pilot international multimodal transport of goods, the UN/CEFACT data model (in particular, the MMT RDM) and the album of the Federal Customs Service electronic document formats, used for electronic interaction between carriers and declarants of customs procedures with the information system of the Federal Customs Service.

The purpose of the mapping is to study, by the example of "paper" transport and shipping documents of a specific pilot international cargo shipment, the practical technical possibility of using the UN/CEFACT reference data model for multimodal international transport (in particular, the MMT RDM) to generate electronic data for the pilot transportation and their subsequent use for customs operations and procedures in electronic form in accordance with the requirements of the regulations of the Eurasian Economic Union.

The results of mapping data from B2B documents to convert them from one form to another and to form electronic data of the UN/CEFACT data model (in particular, the MMT RDM), formation of electronic documents for the purposes of pre-arrival informing the customs authorities of the Russian Federation and electronic declaration of the customs transit procedure are presented in the Appendix 10.

The table summarizes data from paper transport and shipping documents of the pilot transport, the UN/CEFACT data reference model (in particular, the MMT RDM) and electronic documents of the Album of formats of electronic forms of documents of the FCS of Russia. Due to limited resources, time and multiple tasks, data from other subsets of the UN/CEFACT reference data model, in particular SCM RDM, were not used or analyzed in the mapping. In this study, the data mapping considered only those data defined by customs authorities as mandatory for submission to customs authorities.

In the attached table of data mapping results, information and data required to be submitted to the customs authorities of the Russian Federation, but not available in the UN/CEFACT data model (in particular, the MMT RDM) or in paper transport and shipping documents, are highlighted in red.

Chapter 4. Conclusions and recommendations based on the results of the analysis

Conclusions on the results of data mapping:

1. The UN/CEFACT materials at https://unece.org/trade/uncefact are quite difficult to understand and apply, even by practicing logistics information system developers. Requires additional knowledge and competencies.

2. The Album of Electronic Document Formats used by the Federal Customs Service of Russia is not harmonized with the UN/CEFACT RDMs. Data elements described in the MMT RDM are insufficient for the full-fledged formation of electronic documents for their submission to the FCS of Russia.

3. The Album of Electronic Document Formats used by the Federal Customs Service of Russia historically has a high level of data coherence: almost every document contains references to identification data of other documents. Besides, electronic transport documents are strongly related to commercial ones, repeating large fragments of both data and structure from them. That is, specific document requisites tied to a specific form of a paper document prototype are referenced.

UN/CEFACT data model is created on the principles of electronic data exchange with a possibility of reuse by different participants of the information exchange and has a wider application. Therefore, data elements are less linked and do not refer to each other.

4. Russian Customs authorities in the implementation of the electronic customs declaration of goods have maintained a document-centric approach: customs inspectors monitor the electronic document, they want to see the printed form of the electronic document, and not use a set of electronic data on the goods.

The documentary approach of the FCS of Russia dictates a very strict data structure, in which each entity has a strict subordination within the hierarchy. Although this approach is inconvenient for automation, it appears to be used in order to keep electronic documents similar to paper documents. Because of this, electronic documents contain many repetitions, duplications of information.

5. In paper documents provided under the pilot project, there is no information about the taxes assessed for payment and discounts granted. The whole group of information about values, taxes and discounts is necessary for declaring customs procedures and determining the customs value of the consignment. The information in it is interrelated and some amounts can be obtained by calculation, but for the completeness of the information it is clearly necessary to know the total discount amount and the total amount of tax charges for each invoice of the consignment. These data elements are not available in the MMT RDM. 6. There is no "document name" data element in the MMT RDM. UN/CEFACT MMT RDM is not "documentary". The Federal Customs Service of Russia's album formats electronic document must be accompanied not only by its number and date, but also by its name, which must be unambiguously translated into Russian and coincide (in the original) with the paper form of the document.

7. Documents of FCS of Russia are based on the reference book of measurement units established by the decision of the Eurasian Economic Commission, and not only on the codes, but also on the names (in Russian). It is impossible to find a suitable reference book that can be harmonized with the one used by the FCS of Russia.

8. The electronic documents require the mandatory indication of the main details of legal entities registered on the territory of an EAEU member state, which apparently requires the organization to maintain a reference book of details of organizations.

9. Some details of electronic documents are based on directories and classifiers (for example, TNVED EAEU or code of the EAEU customs authority). These details must be filled in by a subject matter expert. In this regard, the ability to fully automatically convert or fill out documents is currently hindered by the need for the participation of an field expert.

10. Russian customs authorities use a classifier of document type codes (Box 44 of customs declaration), for which there is no analogue in the UN/CEFACT data model.

Recommendations on the results of the analysis:

1. To develop methodological recommendations for developers, examples of the use of UN/CEFACT models in practical cases. Conduct seminars and trainings in countries to popularize the practical application of UN/CEFACT standards for electronic data exchange.

2. Hold a joint seminar with the Eurasian Economic Commission and representatives of customs authorities of the EAEU member states to discuss the harmonization of the UN/CEFACT data model with the applicable EAEU data model and the Album of Electronic Document Formats of the FCS of Russia. Analyze the mandatory and non-mandatory elements in documents from the Format Algorithm and, if necessary, supplement the UN/CEFACT data model with new elements.

3. Participants of information exchange need to move from the documentcentric approach, to the exchange of electronic data sets. The Federal Customs Service can play a major role in this by promoting such an approach as part of the development of the Federal Customs Service's Album of Electronic Document Formats.

4. The UN CEFACT data model should be supplemented with data elements in terms of information about taxes and discounts required for declaring customs procedures and determining the customs value of a consignment of goods.

5. The requirement of the market is to provide electronic documents with their requisites. Therefore, it is necessary to add elements to the UN/CEFACT Data Models, which will allow to create formats and structures for electronic documents and their printed forms (XLT-schemes).

6. Since application of an electronic digital signature (EDS) is obligatory in case of business-to-state (B2G) interaction in the EAEU countries, a legally significant electronic document should be signed by an enhanced qualified electronic signature. In a cross-border information exchange of electronic messages a mechanism of a trusted third party (TTS) is applied to recognize the validity and correctness of an electronic signature of a person from another state. The application of the TTS mechanism in the EAEU is regulated by Decision No. 105 of the Board of the Eurasian Economic Commission (EEC) of September 27, 2016. Currently, the information block of electronic signature and TTS in electronic message formats of UN/CEFACT is missing. It is necessary to supplement international formats of UN/CEFACT with electronic signature blocks and TTS.

7. Analyze the reference books and classifiers used in the EAEU and the FCS of Russia in order to establish compliance and possible harmonization with similar UN/CEFACT reference books (code lists).

8. Consider the possibility of including the names of elements in Russian in the UN/CEFACT directories (for example, measurement units, types of packaging, etc.).

9. To develop a reference book of requisite types for organizations and physical persons. An example of such a reference book is proposed in the framework of the project (Annex 11).

10. In the UN/CEFACT data model, develop a classifier of codes and types of shipping documents used by traders and customs authorities.

Chapter 5. The concept of a data converter for paperless crossborder information exchange

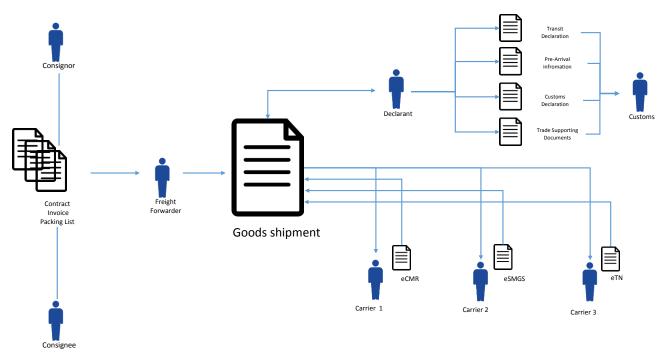
As noted above, supply chains use a large number of different shipping documents between business partners and documents that are submitted to government agencies. These documents often use repetitive data. Traders do not have the ability to automatically transfer data from one mode of transport to another, from one mode of transport to another, and are forced to repeatedly enter the same data at different stages of the transport and supply chain.

The information systems of supply chain participants are not interoperable with each other. Therefore, there is no seamless data exchange - seamless data exchange between modes of transport and between sectors - which makes it very difficult to use data and documents received electronically from other supply chain participants. The new standards recommended by UN/CEFACT are not yet in use in this area.

The use of different standards acts as an obstacle to the movement of data in commodity supply chains. The solution could be the creation of a data converter. This is a tool for automated conversion of structured data from one source (document) to another based on different structural models (for example, shipping documents to customs declaration); or automated presentation of the same document (creation of an equivalent document) in structures of different models (for example, a transport document used by business into a similar transport document required for submission to government authorities).

In an ideal situation, initially a foreign counterparty makes up a document in electronic form according to UN/CEFACT standards and transmits it to another counterparty in Russia. To be used for customs declaration on the territory of the Russian Federation, such electronic shipping documents are converted into equivalent documents in the Federal Customs Service's data model structures or the EAEU data model via the Data Converter available to the Russian declarant. In addition, the data obtained from electronic trade supporting documents, after conversion, can be directly used to generate an electronic customs declaration and other documents for customs purposes (Figure 2).

Figure 2: Data converter concept for converting electronic documents from one data model to another



Data Converter acts as a kind of adapter, a bridge for different structured data, allowing, while maintaining different data models, to support rapid transfer of data from one format to another in the supply chain of goods.

For today's Russian model for the digitization of shipping documents, a reasonable step for development and improvement would be both the use of Data Converter and full connection to a unified solution within the EAEU in the form of the Eurasian Open Integration Model (EOMI), and, in particular, the transition to the Eurasian Data Model³.

In such a scenario, formats and structures for B2B shipping documents should appear in the EOMI. Consequently, the Eurasian Economic Commission should exercise its right to determine unified requirements for the electronic type of documents (electronic documents) within the EAEU⁴, and provide traders with the necessary structures, preferably harmonized with the UN/CEFACT standards as much as possible.

Such a request is already being felt now. In particular, the exchange of information between Russian and Belarusian railroads requires compliance with internal standards of the Federal Customs Service. And this is one of the main reasons why foreign shippers who form EAEU transit freight flows cannot process shipping documents electronically.

³ https://eomi.eaeunion.org

⁴ Paragraph 11 of Annex No. 3 to the Treaty on the Eurasian Economic Union of May 29, 2014

When it comes to information systems and documents of state bodies, one must agree that there are objective reasons to use reference data models created at the state level. The Eurasian Economic Commission performs part of the government functions of EAEU member states, hence it is expected that customs authorities will use EOMI. In this regard, the Data Converter model will be in demand. This conclusion is true both for the Russian Federation, where information technology is the most advanced, and in other EAEU member states, where digitalization processes have just begun.

Chapter 6. Development of electronic document equivalents (XML schemas and, if possible, JSON API specifications) for selected documents and data exchange, aligned with MMT RDM and EOMI

Development of electronic documents, xml-schemes and API JSON specifications without their application to specific information systems, which automate and serve practical business processes, seems to be rather time-consuming and, probably, not much in demand in the future.

At the same time, it is worth noting the experience of the Autonomous Non-Profit Organization "Directorate of International Transport Corridors" (hereinafter - ANO "DMTC") established by the Ministry of Transport of the Russian Federation in improving the efficiency of international transport corridors passing through the Russian Federation, through the introduction of digital technologies and services.

In accordance with the approved plans ANO "DMTC" formed a list of priority digital pilot projects, through which a unified strategy for the development of international transport corridors:

- Conducting a pilot project between the Russian Federation and the Republic of Belarus on the use of electronic international consignment note e-CMR;

- Conducting a pilot transportation of cargo by rail in containers along the route between the terminal-logistics centers "Vostok-Zapad" (Kaliningrad region, railway station Chernyakhovsk) and "Bely Rast" (Moscow region, railway station Bely Rast) using electronic data of transportation and digital services.

While carrying out pilot projects, ANO DMTC is working on the legal issues of using international electronic document formats and, in particular, data formats harmonized with UN/CEFACT standards for freight transportation along international transport corridors.

6.1 Pilot project on implementation of electronic international consignment note for road transport e-CMR between the Russian Federation and the Republic of Belarus

The e-CMR project is an international bilateral Russian-Belarusian pilot project, which results may be later implemented by other EAEU member-states in 2021-2022. Its implementation corresponds to the requirements of point 4 of the

Action plan ("road map") on the realization of basic trends and stages of coordinated (coordinated) transport policy of the Eurasian economic union member-states in 2021-2023, adopted by the Eurasian intergovernmental council on August 20, 2021 № 15.

Objectives of the e-CMR project:

1. Development of an electronic message format for the transition from a paper CMR waybill document to an electronic legally significant document e-CMR based on the application of the UN CEFACT international standard, which is of paramount importance for the decision to use the tested in the pilot project electronic message and business scenario by other states, including EAEC, EU, SCO, BRICS.

2. Practical testing of technology for cross-border exchange of legally significant electronic documents between subjects of different states using mechanisms of reinforced qualified electronic (digital) signature (EDS, EDS) and "trusted third party" (TTS).

3. Formation of proposals for amendments to state and supranational normative legal acts in order to fully implement e-CMR and other electronic shipping documents.

Principle of e-CMR project implementation:

Representatives of transport market (consignors, carriers and consignees) of the two states: the Russian Federation and the Republic of Belarus will take part in forming and processing of legally significant e-CMR document. Using the software provided by Russian and Belarusian companies-providers of electronic data interchange (EDI-providers), the participants of transport market will execute international carriage in accordance with the CMR convention. The consignors, carriers, consignees will enter the data into their e-CMR sections, certifying them with their electronic (digital) signatures. In accordance with the business scenario of the e-CMR project, participants of the transport market in Belarus and Russia will interact only with the electronic document management (EDI-providers) on the territory of their states.

Information about a vehicle, cargo and transportation will be provided by EDI-operators to the National Electronic Logistics System of the Republic of Belarus and to the State Information System of Electronic Transport Documents of the Russian Federation. State supervisory bodies of these states will have access to e-CMR information through access to these information systems.

Validity of electronic (digital) signatures will be confirmed by the certification authorities (CA) of both countries using the DTS mechanism which will be implemented in invisible for transport market participants background mode on the basis of interaction of EDI-providers with certification authorities, including the certification authorities acting as a "Trusted Third Party".

In the course of the pilot project implementation, an electronic document (XML schema) e-CMR will be developed in accordance with the MMT RDM data model of UN CEFACT.

6.2 Pilot transport of cargo by rail in containers along the route between the terminal-logistics center "Vostok-Zapad" (Kaliningrad region, railway station Chernyakhovsk) and "Bely Rast" (Moscow region, railway station Bely Rast) using electronic transport data and digital services

The project of rail transportation using electronic transport and shipping documents without the use of paper documents is an international multilateral pilot project to be implemented in 2022-2023, the results of which in the future may be implemented by other member states of the EAEC. The pilot project involves the terminal and logistics centers "Vostok-Zapad" (Kaliningrad region, railway station Chernyakhovsk) and "Bely Rast" (Moscow region, railway station Bely Rast), the Railways Administrations of the Russian Federation, the Republics of Belarus, Lithuania and Latvia.

Project objectives:

Development of technology for the international transportation of a container train loaded with EAEUgoods between terminal and logistics centers located in the Kaliningrad region and in the Moscow region, using electronic transport and shipping legally significant documents and with the possibility of introducing messages of the international standard UN CEFACT, which is important when deciding to use the technology tested in the pilot project and business scenario by other states, including EEU, EU.

Project Implementation Principle:

1. In the pilot project in the container train transports goods of the EAEU.

2. The pilot project uses solutions to ensure the legal significance of electronic documents and services of the Trusted Third Party developed and used by JSC "Russian Railways" for information exchange of electronic transport documents with the Administrations of the Railways of the neighboring states: the Republics of Belarus, Lithuania and Latvia.

3. The pilot project uses the developed information systems and solutions to ensure the implementation of the technology of electronic transit of consignments of container trains in the Eurasian Economic Union.

Currently, shipments of goods in container trains between terminal and logistics centers located in the Kaliningrad Region and the Moscow Region are accompanied by paper shipping documents, which are required by the Lithuanian and Latvian railroad administrations to place shipments in container trains under the customs procedure of customs transit through the European Union. The use of paper documents will be eliminated by replacing them with electronic legally significant e-Invoice and e-PackingList documents corresponding to the MMT RDM UN SEFACT data model.

In the process of implementation of the pilot project an electronic document (XML schema) e-CMR will be developed in accordance with the UN/CEFACT MMT RDM data model.

Thus, it can be concluded that the implementation of the above-mentioned pilot projects by ANO "DMTC" will be a practical continuation of the work initiated in this study. Conclusions and recommendations obtained in the framework of the study will be used for further discussion at the site of the ANO "DMTC" and the Eurasian Economic Commission.

ANNEXES

Annex 1 Pre-arrival information form

RU/251121/003106350



Предварительная информация о товарах, предполагаемых к ввозу на таможенную территорию Евразийского экономического союза автомобильным транспортом

Код цели представления предварительной информации 01

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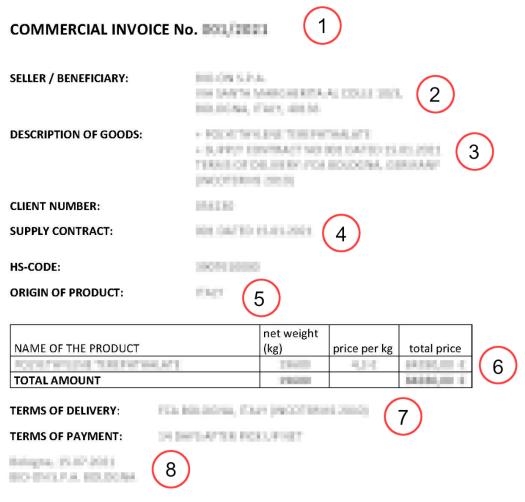
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Annex 3 Customs declaration

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Annex 4 Commercial Invoice



LUNCH CANNELS

PACKING LIST



Loss Country,

Annex 6

Certificate of Inclusion in the Register of Customs Representatives

РОССИЙСКАЯ ФЕДЕРАЦИЯ ФЕДЕРАЛЬНАЯ ТАМОЖЕННАЯ СЛУЖЕ О02438 СВИДЕТЕЛЬСТВО № _0935/00 О ВКЛЮЧЕНИИ В РЕССТР ТАМОЖЕННЫХ ПРЕДСТАВИ Настоящим Федеральная таможенная служба подтверждает Общество с ограниченной ответственностью «РАТЕН Исименование организации сумельных представия в Ресстр таможенных представителей. Местонахождение организации _129337, г. Москва, ул. Красная Сосна, а. 3. ИНН7715562547) ителей включение »
№ О включении в Реестр таможенных представи Настоящим Федеральная таможенная служба подтверждает Общество с ограниченной ответственностью «РАТЕН изичнование организации сунанизиционно-правовой формы) в Реестр таможенных представителей. Местонахождение организации 129337, г. Москва, ул. Красная Сосиа, д. 3, ИНН	ителей включение
№ О включении в Реестр таможенных представи Настоящим Федеральная таможенная служба подтверждает Общество с ограниченной ответственностью «РАТЕН (наимоедано организации сунашных органедиционо-правовой формы) в Реестр таможенных представителей. Местонахождение организации 129337, г. Москва, ул. Красная Сосиа, д. 3, ИНН	ителей включение
Настоящим Федеральная таможенная служба подтверждает Общество с ограниченной ответственностью «РАТЕН изиченовние организации сунаниче организационно-правовой формы) в Реестр таможенных представителей. Местонахождение организации 129337, г. Москва, ул. Красная Сосна, д. 3, ИНН 7715562547	е включение »
Общество с ограниченной ответственностью «РАТЕН книженование организации с унсанием организационно-правовой формы) в Реестр таможенных представителей. Местонахождение организации 129337, г. Москва, ул. Красная Сосиа, д. 3, ИНН 7715562547 (идентфикацизенее нолео налоственсириса)	»
(наименование организации с учаденных организационно-праковой формы) в Ресстр таможснных представителей. Местонахождение организации 129337, г. Москва, ул. Красная Сосна, д. 3, ИНН 7715562547	
Местонахождение организации 129337, г. Москва, ул. Красная Сосиа, д. 3, ИНН 7715562547 (одентфикацизеней нолер налоготиленация)	офие 508
Местонахождение организации 129337, г. Москва, ул. Красная Сосиа, д. 3, ИНН 7715562547 (пдентфокацизеней нолер налоготаленация)	офис 508
ИНН 7715562547 (идентификациреннай нолер налоголяртельцика)	
(идентификациозный номер налоголлательщика)	
Наименование и местонахождение обособленных структурни	ux.
подразделений	
	<u>SVI</u>
	-
Ограничение сферы деятельности: по видам товаров в соответствии с ТН ВЭД ТС	нет
по видам транспорта	нет
по региону деятельности	нет
по видам таможенных операций	нет
Дата выдачи " <u>07</u> " <u>сентября</u> 20 <u>18</u> г.	
	I. Булавин
Tanta Reg (vanitasopulating Juga A010 Pocochi) (narines) (antuna	ы, фамилия)

Annex 7 Transport bill of lading according to the CMR convention

Отправитель (наименование, адрес, страна) Absender (Name, Anschrift, Land)	Международная товарно-транспортная	- ' -
Bown Sp.A.	накладная Internationaler	
Mo Santo Mongheilto al Colle 1813, Belogno, Baly, 40454	Frachtbrief Данная перевозка, несмотря	Diese Beförderung unterliegt tratz
	ни на какие прочие договоры осуществляется в соответствии с условиями Конвенции о договоре	Diese Beförderung unterliegt trotz einer gegenteiligen Abmachung den Beatimmungen des Übereinkommens
	с условиями Конвенции о договоре международной дорожной перевозки грузов (КДПГ)	über den Beförderungsvertrag im internat. Straßengüterverkehr (CMR)
2 Dony-varens (Haime-hosehine; appec, cripaHa)	16 Перевозчик (наименование, адрес, страна) Frachtführer (Name, Anschrift, Land)	
2 Empfanger (Name, Anschritt, Land)	Frachtfuhrer (Name, Anschritt, Land)	^
(1987) Kanwane pagokan Miracit, J. Kanwane pag		(13)
Kawashumu a. a. (11. anigure 20)		
3 Auslieferungsort des Gutes	17 Последующий перевозчик (наименование, ад Nachfolgende Frachtführer (Name, Anschrift, Lai	рес, страна) nd)
Mecto / Ort		
Страна / Land		
A Marmu stra nonveru mica		
4 Oct und Tag der Übernahme des Gutes		
Mecto / Ort	18 Оговорки и замечания перевозчика Vorbehalte und Bernerkungeh der Frachtführer	
Crpaka / Land	Vorbehalte und Bemerkungeh der Frachtführer	
5 Begefügte Dokumente		
Hammalin No. 3400(1.4 20/2010) are 34, 43, 200 (i		
Shakonover in rear No 9-5 or 19,00,0071		
6 Знаки и номера Kennzeichen und Nummern 7 Anzahl der Packstücke 8 Art der Verpackung 9	Наименование груза Bezeichnung des Gutes 10 Statistik - Nr.	11 Вес брутто, кг Bruttogew., kg 12 Объем, м ⁹
Treasurement protocol and the second	IN TO SAVATUP DESIGNATION.	30000.000
6 7 8		14
	Y L	
Knacc Llirdpa Byrisa DOTIC Klasse Zifer Buchstabe ADR	ол.	
Nasse Zuter Buchsabe Zuter Buchsabe Abk 13 Anweisungen des Absenders (Zoll-und sonstige amtliche Behandlung)	19 Подлежит оплате: Отправитель Absender	Валюта Получатель Währung Empfänger
Anwersungen des Ausenders (zuirund sonsage annichte Benandung)	Ставка Fracht	wanning Emplanger
23F122, Katherson paglocati offic, J. Vagestadonos, pt. Classipat	Скидки Ermäßigungen –	
	Разность Zwischensumme	
	Надбавки Zuschläge	
Объявленная стоимость груза Adgabe des Wertes des Gutes	Допалнительные сборы Nebengebühren	
(при превышении предела ответственности предусмотренного п. IV, ст. 23, п. 3 указывается только после согласования дополнительной платы к фракту)	Прочие Sonstiges +	
(wenn der Wert des Gutes den It. Kap. IV, Art. 23, Ab. 3 bestimmten Höchstbetrag ubersteigt, so wind er erst nach Vereinbarung des Zuschlages zur Fracht angewießen)	Итого к оплате Zu zahlende GesSu.	
14 Bosepar Rickerstattung	Особые сограсованные условия	
15 Yractura omarau pparko Fra	20 Occ6ые соглассванные условия Besondere Vereinbarungen	
Frei Hedparko Unfrei		
Unme 21 Ausgefertigt in Дата ат	15 24 Epys nom	мен Дата angen Datum
22 am		angen Datum am "19
Прибытие под погрузку час. Мин. Ankunft für Einladung Uhr Min. Путевой лист №	Прибытие под 19 Ankuntt für Ausi	разлоузку час мин
Убытие час. мин. Abfahrt Uhr Міл. Фамилии	Убытие Abfahrt	час. мин. Vhr Min.
водителей		
Подпись и штамп отправителя Подпись и штамп перевозчика Unterschrift und Stempel des Absenders Unterschrift und Stempel des Frachtf		Stempel des Empfängers
25 Perucrpau, Homep/Amti. Kennzeichen 26 Tяrav/Kfz Mapka/Typ Danynpuujen/Anhänger	27 Тариф I Тарифное % за испол. за 1 км расстояние тягача/п/пр.	Поясной Прочие Сумма коафф. доплаты
YELL CREEN HOUSE LEE		
(1)		
— — —		
28 Тарифное Гариф Надбаеки Симди за 1 Надбаеки Симди	прочие Коплате	Отчисления
28 расстояние, км. Схема за́1† падоажи сииди Тариф II	доплаты кончате	
"		Оплачено заказчиком
	1 1	К оплате
29		Валюта Код плательщика
Тариф		

Annex 8 Certificate of approval of the vehicle for international carriage of goods under customs seals and stamps

СВИДЕТЕЛЬСТВО О ДОПУЩЕНИИ дорожного транспортного средства к перевозке грузов под таможенными печатями и пломбами

> APPROVAL CERTIFICATE of a road vehicle for the transport of goods under Customs seal

Certificate №

Свидетельство № 10129/060319/000219

Конвенция МДП от 14 ноября 1975 года TIR Convention of 14 November 1975

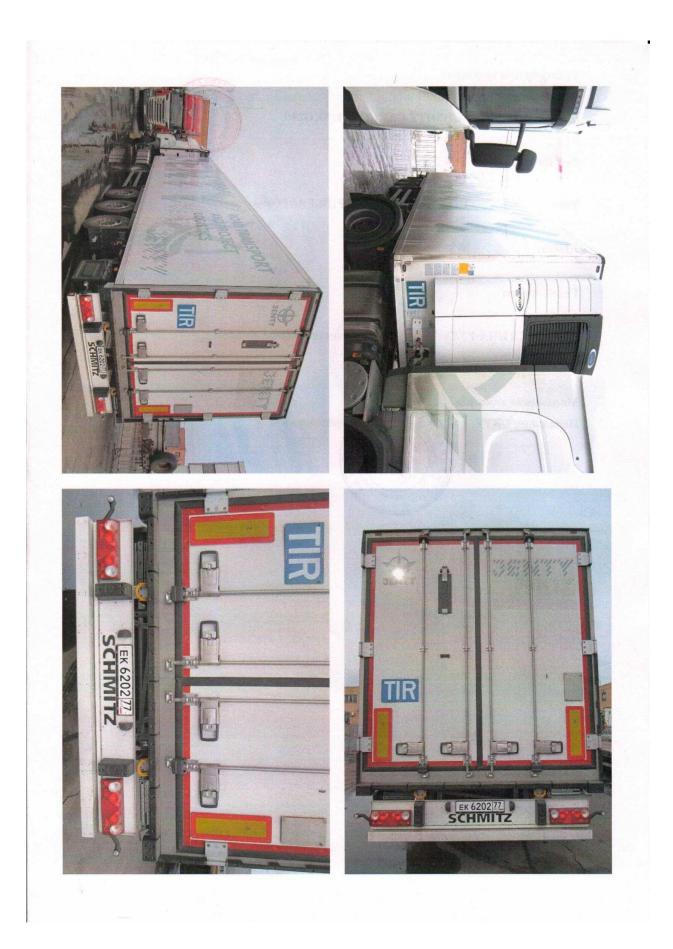
МОСКОВСКАЯ ТАМОЖНЯ

Кем выдано Issued by

вание компетентного органа, стра (Competent Authority, country)

> страница 1 page 1

IDENTIFICATION		Свидетельство №(0/29/0603/9)
	514 6303 77 DUC	Certificate № 000219
1. Регистрационный номер	EK 6202 77 RUS	
Registration №	ПОЛУПРИЦЕП РЕФРИЖЕР/	атор
2. Тип транспортного средс Type of vehicle	тва WSM0000005174598	
Chassis №		·····
4. Марка (или наименовани Trade mark (or name of ma		CARGOBUL SKO24/L
5. Прочие данные Other particulars	ГОД ВЫПУСКА 2017	
6. Количество приложений . Number of annexes	4 ФОТОГРАФИИ	
7. ДОПУЩЕНИЕ APPROVAL		Действительно до 05.03.2021
индивидуальное до individual approval	олущение"	Valid until
Допущение по типу approval by design ty	конструкции ^{-/} /ре. ^{*/}	Stamp M O K E H H Stamp M O K E H H Stamp M Stamp M D Stamp M
Номер разрешения (в соотв Authorization № (if applicable		
Место Place		
Дата Date Начальни		еневская М.В.
Подпись Signature		
8. Владелец (завод-изгото	ированных транспортных средств)	(barob)
Holder (manufacturer, own (for unregistered vehicles only)	-	ва, ул.Марии Поливановой, д.9 Климась Б.Н.
Holder (manufacturer, own (for unregistered vehicles only) Наименование и адрес	Директор	ва, ул.Марии Поливановой, д.9
Holder (manufacturer, own (for unregistered vehicles only) Наименование и адрес Name and address 9. ПРОДЛЕНИЕ RENEWALS	Директор	ва, ул.Марии Поливановой, д.9
Holder (manufacturer, own (for unregistered vehicles only) Наименование и адрес Name and address 9. ПРОДЛЕНИЕ RENEWALS Действительно до Valid until	Директор	ва, ул.Марии Поливановой, д.9
Holder (manufacturer, own (for unregistered vehicles only) Наименование и адрес Name and address 9. ПРОДЛЕНИЕ RENEWALS Действительно до Valid until Mecto Place	Директор	ва, ул.Марии Поливановой, д.9
Holder (manufacturer, own (for unregistered vehicles only) Наименование и адрес Name and address 9. ПРОДЛЕНИЕ RENEWALS Действительно до Valid until Mecto Place Дата Date	Директор	ва, ул.Марии Поливановой, д.9
Holder (manufacturer, own (for unregistered vehicles only) Наименование и адрес Name and address 9. ПРОДЛЕНИЕ RENEWALS Действительно до Valid until Mecto Place Дата Date Подпись Signature	Директор	ва, ул.Марии Поливановой, д.9
Holder (manufacturer, own (for unregistered vehicles only) Наименование и адрес Name and address 9. ПРОДЛЕНИЕ RENEWALS Действительно до Valid until Mecto Place Дата Date Подпись Signature Печать	Директор	βа, ул.Марии Поливановой, д.9 Климась Б.Н.
Holder (manufacturer, own (for unregistered vehicles only) Наименование и адрес Name and address 9. ПРОДЛЕНИЕ RENEWALS Действительно до Valid until Mecto Place Дата Date Подпись Signature Печать	Директор	βа, ул.Марии Поливановой, д.9 Климась Б.Н.
Наименование и адрес Name and address 9. ПРОДЛЕНИЕ RENEWALS Действительно до Valid until Mecto Place Дата Date Подпись Signature Печать Stamp	Директор	ва, ул.Марии Поливановой, д.9 Климась Б.Н.



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Марка:	SCHMITZ CARGOBUL SKO24/L		
Гос. Номер:	EK 6202 77 RUS		
Тип:	ПОЛУПРИЦЕП РЕФРИЖЕРАТОР		
Шасси:	WSM0000005174598		
Год выпуска:	2017		
ЗАО «ФЕСТИНА	A-PYC» ⁽ ФЕСТИНА-РУС") ⁽ FESTINA-RUS") ⁽ FESTINA-RUS")		
Московская там Начальник ОКТ	Т кореневская М.В.		
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Annex 9 SMGS railway bill of lading convention

