

INLAND TRANSPORT COMMITTEE

**Working Party on the Transport  
of Dangerous Goods**  
(Seventy-fourth session,  
Geneva, 19-23 May 2003)

**PROVISIONS CONCERNING LOADING, UNLOADING AND HANDLING**

**Document from Belgium concerning sub-section 7.5.1.1**

Conc : interpretation of the words  
“loading and unloading sites” in § 7.5.1

The question whether container terminals (for instance a road-rail terminal) are subject to §7.5.1 of ADR or not, has been raised several times in Belgium.

Although it has been argued that in these terminals the containers and tank containers are manipulated but not loaded and unloaded, Belgium is of the opinion that § 7.5.1 applies to these sites.

Belgium is interested to know the opinion of the other Contracting Parties with regard to this subject.

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