



Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods****116th session**

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Item 5 of the provisional agenda

Interpretation of ADR**Requirements of ADR 7.5.11, CV1 (1)****Transmitted by the Government of the United Kingdom of Great Britain and Northern Ireland*****I. Background**

1. During national discourse the wording of ADR 7.5.11, CV1 (1) has raised some discussion for which we are seeking clarification.
2. CV1 applies to a multitude of UN entries. The full text of CV1 (1) is provided below but in summary, CV1 (1) (a) and (b) prohibits loading and unloading of an applicable dangerous good in a public place, built up area or otherwise without permission from the competent authority when utilising CV1 (1) (a) or prior notice when utilising CV1 (1) (b) unless the operations are urgently necessary for safety.
3. ADR 7.5.11, CV1 (1) reads:
“CV1 (1) The following operations are prohibited:
 - (a) *Loading or unloading goods in a public place in a built-up area without special permission from the competent authorities;*
 - (b) *Loading or unloading goods in a public place elsewhere than in a built-up area without prior notice thereof having been given to the competent authorities, unless these operations are urgently necessary for reasons of safety.”*

II. Discussion

4. The United Kingdom competent authority has been deliberating as to whether the “special permission” referenced within ADR may be granted generally or should be specifically granted on a case-by-case basis.
5. Granting the special permission generally would permit the loading and unloading of a particular UN number irrespective of who was conducting the unloading and loading and

* A/78/6 (Sect. 20), table 20.5.



in whichever public place or built-up area. For example, the competent authority could issue a generic special permission for a particular UN number and declare no further special permissions need be sought for loading and unloading of this item in public places or built-up areas for a specified length of time. It is the United Kingdom's opinion that such a special permission could not be granted for multiple, different UN numbers as different considerations may need to be applied within the special permission.

6. Whereas, granting the special permission specifically, would operate to permit only a specific loader and unloader from loading and unloading, and again only for a specific UN number. This would be on a case-by-case basis considering the merits of each application for a special permission individually.

III. Clarification request

7. The United Kingdom's view is that the wording of ADR, CV1 (1) should be interpreted as implying that special permissions should only be issued on a case-by-case basis.

8. However, we welcome the view of other Contracting States to ADR and look forward to feedback.
