# **ISSUE NUMBER**

21-005-VEH

#### **ISSUE NAME**

OOSC, Part II, Item 2. Cargo Securement, I. Intermodal Containers

#### STATUS

Closed

Vehicle Committee

#### NAME

**Richard Roberts** 

AGENCY

Commercial Vehicle Safety & Enforcement

## ADDRESS

Suite 3A - 940 Blanshard Street Victoria, BC V8W 9T5 Canada

### PHONE

250-953-4032

### EMAIL

richard.roberts@gov.bc.ca

### SUMMARY OF ISSUE

At what point does an intermodal container not need to be secured per the cargo specific commodity section? These containers are being modified for many different purposes including mobile offices. They also have skids added to them for use in the oilfield.

# JUSTIFICATION OR NEED

This needs to be addressed for consistency so jurisdictions are enforcing the standard correctly. There are specific requirements for safe loading if these are still considered intermodal containers. The integrity of the structure changes when windows and doors are added. Also if it is defined as an intermodal container; would it be considered loaded or unloaded if it was equipped with permanent fixtures? (Desks, shelves, cabinets) Does adding a skid under an intermodal container change the safe loading requirements?

# **REQUEST FOR ACTION**

Determine what section of the cargo securement standard these containers/buildings fall under. Update training materials, guidance documents, etc depending on outcome. A possible webinar or inspection bitz on the topic.

#### SUPPORTING DOCUMENTS/PHOTOS

- ICSkid.jpg
- <u>IC2.jpg</u>
- <u>IC1.jpg</u>

# ACTION TAKEN BY COMMITTEE

The Cargo Securement Harmonization Public Forum discussed this issue and reported out to the Vehicle Committee that because of these modifications, these intermodal containers no longer meet the definition of an intermodal container. A motion was made to modify Operational Policy 15 regarding containers that have corner locks but are not used for the intermodal industry to read as follows:

2.b.(11) Must all storage/office modules with corner locks, not used for intermodal transportation, be secured as required by the commodity specific section for intermodal containers?

ANSWER: No, modified intermodal containers used for office space or other storage modules equipped with corner

locks (i.e., PODs) may be secured using general provision or they may be secured by corner locks as per equivalent means of securement.

Pictures from the issue request were also used for further clarification for the policy.