

ISSUE NUMBER

22-005-VEH

ISSUE NAME

Operational Policy 15, Item 2.b(1) - Tarp Straps and Bungee Cords

STATUS

Closed

Vehicle Committee

NAME

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CVSA Operational Policy 15, Item #2.b.(1), revised at the 2018 CVSA Workshop in Kansas City as a result of issue request #17-032-VEH, is causing confusion among enforcement and industry regarding the use of bungee cords for small items such as brooms and rakes.

JUSTIFICATION OR NEED

The first line of item #2.b.(1) for the United States guidance reads, "Bungee cords and tarp straps are not suitable for use as securement devices and are equally unsuited to having an assigned WLL."

The second line seems contradictory to that because it states, "There is no intention to prohibit the use of these devices as primary or supplemental restraint for articles..."

These contradicting statements have caused erroneous violations being issued on roadside inspection reports, burdens carriers with DataQ challenges, and burdens states with investigating DataQs. It is understandable why industry and enforcement both are confused since the lines seem contradictory.

REQUEST FOR ACTION

Determine whether the first line is needed and if not, remove it. If the intent is NOT to prohibit the use of bungee cords for small items, such as brooms, rakes, shovels, etc., that are not part of the cargo, then remove the first line from the United States guidance. This was the ultimate discussion at the KC workshop in 2018, and the decision based on the meeting minutes.

ACTION TAKEN BY COMMITTEE

The committee voted to amend Operational Policy 15 2. Cargo Securement, b. (1) for the U.S. to read as follows:

Regulatory Guidance

b.(1) Can a bungee cord or tarp strap be used as a primary means of securing an article of cargo and does it need to be rated and marked with a working load limit (WLL)?

UNITED STATES

ANSWER: Bungee cords and tarp straps are not suitable for use as securement for articles of cargo being

transported as part of the shipment, even if they have a WLL. There is no intention to prohibit the use of these devices as primary or supplemental restraint for articles, such as tools and supplies, that are not being transported as part of the shipment but are capable of falling from the vehicle if they are not secured. This would include items such as tarps, dunnage, plastic bottles of automotive fluids (e.g., motor oil, windshield washer fluid, water, etc.) used for the operation of the vehicle, tire irons, tools and any other item that may fall from the vehicle.