Cargo Securement Harmonization Public Forum Agenda

Ottawa, Canada

November 6, 2025

09:00 AM-5:00 PM

Revised Date: October 6, 2025

Chair: Roger Eberle
Vice Chair: Kevin Adkins
Secretary: Carl Bone
CVSA Liaison: Kerri Wirachowsky

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AGENDA

1. Opening Remarks & Self Introductions

2. Adoption of Agenda

Issues should be submitted in advance, if possible, to the North American Cargo Securement Harmonization Public Forum through CVSA's Issue/Request for Action (IRFA) form on the CVSA website. New issues may also be raised at the forum. Issues are generally discussed in the order received.

3. Review/Approval of Meeting Minutes from New Orleans, LA

Attachment 1 – 2025 New Orleans Cargo Securement Meeting Minutes.pdf

Meeting minutes are included for review and will be approved during this meeting.

4. Review of Committee Structure, Terms of Reference & Business Processes

This forum does not have any regulatory or enforcement authority but instead either requests consideration by U.S. and/or Canadian regulators or provides feedback to CVSA's Vehicle Committee, which in turn may effect changes in

CVSA policies or Out-of-Service Criteria (OOSC) accordingly. The forum works to facilitate uniform policies, regulations, and enforcement for cargo securement in North America. The forum is open to all interested parties.

5. Regulators Group Status Report

Regulators from the U.S. and Canada provide relevant cargo securement regulatory policy or research updates unrelated to the Request for Action issues throughout the agenda. Those will be addressed throughout the meeting.

Request for Action Items (NEW)

6. 25-086-VEH: Inspection Bulletin 2502-02 Exte Com90 Log Securement System

Submitted By: Richard Roberts, CVSE British Columbia

Attachment 2 – Attachment 2 - 2025-02 ExTe Com90 Load Securement

Summary of Issue

To discuss the applicability of the Exte Com90 log securement system in Canada including the inspection bulletin 2025-02.

Justification or Need

For consistency of the acceptance of this system in Canada and appropriate enforcement taken by roadside officers. It's unclear if the bulletin applies in Canada. It is my understanding that this system has been tested and has engineering documents that state the system meets the requirements of NSC 10. If a system is designed to meet Section 5, it is considered as meeting the standard. I am not sure why we wouldn't accept this system if the manufacturer provides documentation, it meets section 5? The performance criteria is the same in both countries.

Request for Action

Confirm acceptance in Canada and include NSC references in the bulletin and Canadian training materials.

7. 25-047-VEH: OOSC Part II, Item 2. Cargo Securement, h. Dressed Lumber and Similar Building Products

Submitted By: Joshua Robins, Maryland Department of the Environment

Summary of Issue

Inspection rejected for citation of 393.118(d) for load securement of stacked building materials. Combination Vehicle was transporting 3 high stacks of Rebar Grid measuring 9ft in length, missing a strap from the front, middle stack requiring 2 tiedowns per 393.118(d) reference back to 393.110(b)(2)ii.

Justification or Need

Need to clarify what constitutes a finished building product for applicability to 393.118. Controlling Inspection Agency (Maryland State Police) stated Rebar Grid does not fit into 393.118 because it is not lumber.

Request for Action

Could the Cargo Securement Harmonization Forum collectively discuss whether Rebar Grid (Rebar welded together in a grid formation for placement inside of concrete structure for structural support) would qualify as a finished building product or similar item?

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Open Issue/Request for Action Items

8. 23-018-VEH: OOSC, Part II, Item 2. Cargo Securement, m. Automobiles, Light Trucks and Vans – Winch as Tiedown

Summary of Issue

Our commercial officers have had an ongoing question regarding vehicle securement under 49CFR 393.128 and slide back tow trucks.

128(b) requires two tiedowns:
393.128 What are the rules for securing automobiles, light trucks and vans?
(a) Applicability. The rules in this section apply to the transportation of automobiles, light trucks, and vans which individually weigh 4,536 kg. (10,000 lb) or less. Vehicles which individually are heavier than 4,536 kg (10,000 lb) must be secured in accordance with the provisions of § 393.130 of this part.
(b) Securement of automobiles, light trucks, and vans.
(1) Automobiles, light trucks, and vans must be restrained at both the front and rear to prevent lateral, forward, rearward, and vertical movement using a minimum of two tiedowns.
(2) Tiedowns that are designed to be affixed to the structure of the automobile, light truck, or van must use the mounting points on those vehicles that have been specifically designed for that purpose.
(3) Tiedowns that are designed to fit over or around the wheels of an automobile, light truck, or van must provide restraint in the lateral, longitudinal and vertical directions.
(4) Edge protectors are not required for synthetic webbing at points where the webbing comes in contact with the tires.

Our question: Can a powered winch (used for loading or unloading) be considered a tiedown? Winch manufacturers seem to indicate they are for loading or unloading but not securement.

Justification or Need

Discuss use of loading winch for roll backs - whether it should be used as a tiedown or whether the regulations should identify that loading winch is NOT to be used for subsequent load securement during transport.

Louisville Meeting

Winch manufacturers do not feel using the winch as the primary tiedown is sufficient for cargo securement. The winch can remain connected, but other tiedowns are needed. Item being moved to FMCSA to be addressed in omnibus ruling. FMCSA indicated that this will be in the Omnibus ruling, but no date was provided.

Ottawa Discussion – For Review and Report to Vehicle Committee

FMCSA is looking to amend the use of the winch as a secondary device, but not a primary tiedown. This will not impact the winch portion of a roll-on/roll-off securement as they are used to keep the bin in the integral locking system. It is not a tiedown. It cannot be used as a front tiedown if the integral system is not functioning. Canada had indicated that it would allow the use if side to side movement is eliminated, and rearward is secure. The question was asked if that is the case, how is the winch a compliant tiedown when it is not marked and rated with a WLL as this is a requirement in Canada.

There is an interpretation in the NSC Standard 10 Interpretation Guide in Canada that says the winch can be used as a tiedown, but that interpretation was written before the WWL marking requirement.

Manufacturers are against a winch being used as the front securement device. It was suggested that Canada should evaluate the interpretation guide as it conflicts with the Standard. Information in previous meetings was that if the standard and the interpretation guide have different guidance, then the Standard should be used and the Canadian attendees in the meeting agreed that this same theory should be used here.

There was no update on this issue in New Orleans.

FMCSA will report on the status of the Omnibus bill.

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Petitions

9. 21-013-VEH: OOSC, Part II, Item 2. Cargo Securement-Working Load Limit/Breaking Strength-393.102

Attachment 3 – Petition Letter to FMCSA for WLL and Breaking Strength.pdf

Summary of Issue:
393.102 (a)(1) and (2) (a)(1) is discussing Breaking strength. This information is not readily available. Clarification needs to be made to better understand the requirements of this section. Even the "Practical Cargo Securement" guidebook, states that cargo must be secured to the rear (preventing forward movement) .8g of deceleration. It muddies the water even more in (a)(2) (a)(2) talks about WLL and does not clearly define that to comply with this number you must follow the guidelines of 393.106(d) which states that 1/2 of the weight of the cargo must be covered by the WLL of the securement devices. It goes on to say that .43g deceleration and .5g acceleration need to be covered... that is not quite consistent with (a)(1). If the driver has access to the breaking strength numbers or uses the WLL=1/3 of the breaking strength (which is an industry standard but not the rule and typically not labeled on the securement device) then when you work out the math it normally comes out to close to the same requirements. BUT, it is not exact, so why have it in there? it just makes the regulation difficult to understand and be in compliance. Maybe someone can explain it better, but I have worked the numbers several times (see attached) and they just don't make sense. It leaves carriers to make their own assumptions/rules on the requirements.

Justification or Need:
To better clarify the cargo securement regulations and make a distinction/unification of the two conflicting regulations.

Request for Action:
Amend 393.102, to unify (a)(1) and (a)(2), reflecting equalized results from using either method, OR remove (a)(1) because the breaking strength is not readily available information to the end user... the driver. Also reflect greater protection against forward movement of the cargo, .435g protection against deceleration and .5g protection against acceleration is backward, it should, at a minimum, be the other way around.

Discussion in Previous Meetings
FMCSA is working to update the U.S. regs to closely mirror the Canadian regs such as removing part of 102 harmonizing the WWL of direct/indirect tiedowns (this would allow for 100% of the WLL to a tiedown regardless of how it is attached to the vehicle – over the load – from the vehicle to load – from the vehicle to load back to the vehicle on the same side). Dave Sutula suggested that the Cargo Securement Group forum and ad-hoc in advance of the release of the omnibus bill in order to review all the cargo securement related issues to ensure they satisfy issues that have been raised and that any decisions made do not conflict with anything Canada has in place or is working on. This committee will need to look at the rules to verify that the US 393 regulations and NSC Standard 10 are referring to the same requirements. FMCSA will need feedback from this adhoc committee quickly to ensure that the changes will meet our needs. The US would also like to see the reference to breaking strength removed.

The forum will receive an update from FMCSA.

10. 21-002-VEH: OOSC, Part II, Item 2. Cargo Securement, Friction Mats-WLL

Attachment 4 – Petition Letter to FMCSA for Friction Mats.pdf

Summary of Issue

Currently 393.108(g) states friction mats which are not marked or rated by the manufacturer shall be considered to provide resistance to horizontal movement equal to 50 percent of the weight placed on the mat. There is no further guidance for their use as far as when they can and cannot be used in determining the working load limit (WLL) under 393.106. There needs to be guidance added to Operational Policy 15 or regulatory guidance added to the FMCSRs to allow for uniformity in determining the WLL when friction mats are used as well as when and what types of cargo can friction mats be used on.

Justification or Need

A recent inspection of an oversize load with a shipping weight of 120,000 lbs. was secured with a total of 4 chains – 2 on the front and 2 at the rear per cargo specific requirements in 393.130(c) that had a total working load limit of 40,000 lbs. aggregate WLL. The driver claimed he was using friction mats that were located under the front axle of the machine to meet the requirements of 393.106. (See the attached pictures). With no clear guidance on the use of friction mats, we had no choice but to count the friction mats towards the WLL of the machine being transported. However, there is no way of knowing the amount of weight being placed on the mat to determine what the mat is worth, and it is unclear if the friction mat can be used at all in this situation.

Request for Action

Operational Policy 15 or regulatory guidance needs to be created to address the use of friction mats and when they can or cannot be used when determining the WLL under 393.106 and if they can be used to meet cargo specific requirements. Some suggestions would be: A friction mat cannot be used to replace a tiedown required by the cargo specific sections in 393.116 to 393.136. A friction mat cannot be the sole means of load securement in any application. Friction mats can only be used on items that weigh less than 10,000 lbs. Over 10,000 lbs., they can only be used as a supplement means of securement (blocking and bracing) but will not count towards the WLL.

Discussion in Previous Meetings

FMCSA gave us a technical update on friction mats and reported this is in the rule making. The question was how to measure the g-force. In Canada it needs marked and he asked how is it measured? In the US there are no references for commercial transport, but the RR does have a standard. It was suggested that the friction mat manufacturer should have information to use. Once a standard is chosen, this committee and Canada will need to verify it meets the needs of both. This will also need reviewed by the adhoc committee. Ralph Abato forwarded a friction mat standard to review and also forwarded some contacts in the friction mat industry to FMCSA for assistance.

The forum will receive an update from FMCSA.

11. 16-020-VEH: Amend 393.118(d)(3) of the FMCSR's requiring belly straps on loads over 2 tiers high
12. 12-010-VEH: Cargo Securement - Dressed lumber or Similar Building Products

Attachment 5 – FMCSA Petition Regarding Dressed Lumber Petition.pdf

These issues were combined as they both relate to how the commodity specific regulation requires belly straps on dressed lumber. The securement issue arises when trailers are loaded from home improvement stores with several different types of building materials. The material does not make even levels for material placed beside each other which makes the use of belly straps ineffective. The Regulators have discussed that when the rules were developed it was never intended to include stacks of uneven goods, only goods that were even and stacked the same and were actually dressed lumber or similar building products. They further indicated these items in the pictures were all different types of materials and not specifically dressed lumber. FMCSA is working towards regulation that will not require belly straps on loads that are 6 feet or less, however, there is nothing in the model regulation to deal with loads over 6 feet high. Pictures have been shown of tiedowns that are going through the middle and they are not even because it is not possible. The model regulation and testing for the specific commodity section did not contemplate the uneven loads. The study was done for loads coming from the mill, it was never really intended for the loads coming from a retail store to the end user. It has further been discussed that most retail outlets indicate that they can live with staying under the 6 foot level in order to avoid the use of belly straps. Mike indicated that FMCSA reached out to the regulators in Canada to see what sort of testing was done in Canada to affect the revision that was made. It was determined that there was no testing done but other issues that caused the amendment. FMCSA will likely draft a notice to the federal register requesting comments on certain aspects of this issue. They are hoping to harmonize with Canada. The second issue is for belly straps on tiers that are not the same height. The mixed loads do not always allow for belly straps as they are not always equal from side to side. In some cases, belly straps will make the load less secured than if there were no belly straps present. This may or may not be addressed in the upcoming notice regarding the 6-foot belly strap issue. FMCSA will report on the status of the petition

Discussion in Previous Meetings
Dave Sutula indicated that these issues are also part of the omnibus bill and the adhoc committee should be prepared to look closely at this issue in the bill as well.

The forum will receive an update from FMCSA.

13. 11-043-VEH: Marking and Rating of Tiedowns – Working Load Limit (WLL) on Hooks

Attachment 6 – NACM Hook Spec - Final.pdf

Attachment 7 – FMCSA 393.108 NACM Chart Petition.pdf

Attachment 8 – FMCSA 393.108 NACM Petition Acknowledgment Letter.pdf

National Association of Chain Manufacturers (NACM) finalized a document that outlines the performance specifications and marking of removable hooks used in tiedown assemblies. This issue has been outstanding for several years, so the forum decided to ask the Vehicle Committee to ask the Board of Directors to petition FMCSA to make an update to the regulations. The Board of Directors agreed in Portland to direct CVSA staff to petition FMCSA. FMCSA sent an acknowledgement letter and is processing the petition and will decide whether to grant or deny the petition. If they grant it, this means that they will decide whether to publish a public Notice for Comment. FMCSA will report on the status of this petition.

Discussion in Previous Meetings

Dave Sutula provided an update on this issue. The US would need to come up with a performance standard to ensure the hooks are acceptable. Canada does not have this as a requirement in NSC Standard 10 at this time to have the hooks marked yet. This request to reference removeable hooks and has been around since 2011. The goal is to have the hooks marked similarly to chains. Canada should look into updating the NSC Standard 10 to reflect these markings similar to what the US is working on. This can be contemplated by the adhoc when the omnibus bill is reviewed.

The forum will receive an update from the regulators.

14. 11-030-VEH: Securing Metal Coils in Sided Vehicles

The question was raised several meetings ago regarding 393.120(e) and NSC 10(58) which articulate the requirements for securing metal coils in a sided vehicle without anchor points. It could be interpreted to exclude the use of sided vehicles with anchor points, which does not seem to be its intent. This section should be interpreted to mean that metal coils transported in sided vehicles with anchor points should be loaded a manner to prevent shifting and tipping consistent with either 393.120(b), 393.120(c), 393.120(d) or 393.120(e), or in a vehicle without anchor points consistent with 393.120(e). CVSA sent a letter to FMCSA requesting clarification. The regulators indicated new wording is being considered that would stipulate when there are anchor points in a sided vehicle, it will not be mandatory to use them if they are not the most suitable way to secure cargo.

The regulators worked on draft language for the model regulation in Montreal that will trickle down into NSC Standard 10 and the FMCSRs. This language will make it clear that metal coils transported in sided vehicles with or without anchor points will be able to be secured by adequate blocking and bracing. The regulators were to get together and draft the next revision of the model regulation. They reported that possibly by this meeting but no later than the fall meeting of 2019, they should have revised language for the model regulation referencing this issue and a few others that are on the agenda.

Discussion in Previous Meetings
Dave Sutula provided an update on this issue. This issue will be included in the omnibus bill as well. Canada should contemplate making similar edits to the NSC Standard 10 once the language that the US has crafted is reviewed. Although the issue was in relation to slinky coils which are dealt with differently in the U.S. (as metal coils) than in Canada (general cargo), the theory for the amendment would likely apply.

The forum will receive an update from the regulators.

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Old Business

15. 24-048-VEH: OOSC, Part II, Item 2, Cargo Securement - Trailer Rear-Mounted Fork Lifts

Attachment 9 – Operational Policy 15

Summary of Issue

Inspectors are encountering trailer rear mounted forklifts with various methods on how they are secured to the vehicle. This has led to discussions/questions on how they should be secured and has opened the possibility of different enforcement practices and confusion to industry of the correct method. In support of the continued efforts of harmonization and standardization, I ask guidance on how these machines are defined within the regulations for the purpose of securement.

Justification or Need

These forklifts are machines (generally under 10,000 lbs) primarily used in the support of the work of the truck (e.g. unloading sod, sheetrock etc.). The industry standard in securing these to the vehicle generally involves either a chain or bar strap, one on each side. Roadside inspectors are encountering these with either 1 or both tie downs left off and/or the tie downs meet conditions of tie down defect table in the OOSC. Locally we have found differences in enforcement method if these are treated as cargo or dunnage/vehicle equipment. If treated as cargo, then the tie down defect table would apply. If treated as dunnage, then in the U.S. the defect table would not apply and essentially a tarp strap would be sufficient. While I agree that the machine is used to support the work of the vehicle, the analogy can be made that a skid steer sitting on the deck of a trailer loaded with the same product and equipped with forks is also only used to support the work of the vehicle. Both machines have the primary purpose of unloading the product and are just carried on the vehicle in different ways. With the machine on top of the deck it is held to cargo securement rules.

Request for Action

I cannot find if this has been discussed in the past. For the purpose of uniformity, I request the Cargo Securement Harmonization Program discuss this and possibly provide guidance in Operational Policy 15 section 2. Cargo Securement if these trailer mounted forklifts should be considered as cargo or dunnage/vehicle equipment for the purpose of securement.

Ottawa Discussion – For Review and Report to Vehicle Committee

Currently there isn't a standard of securement for the forklift. Most are attached with the forks to a mounting apparatus on the rear of the cargo carrying unit and then safety chains are used as secondary securement to keep the fork lift in place. Most are equipped with lights. These were previously discussed in 2016 and 2021 and FMCSA provided guidance that the forklifts are cargo and would require lights or flags, if required. Due to there being various ways for these to be secured (i.e. pins, chains. etc.) the following language was created to take to the Vehicle Committee as possible language to be added to Ops Policy 15:

QUESTION: *What are the cargo securement requirements for forklifts (mofettes, mules, or donkeys) on the rear of a straight truck or trailer to be used in the unloading of the materials?*

ANSWER: *Providing these devices are secured with the appropriate chains, pins, bars, etc. specified by the manufacturer and there are no damaged or missing parts, the device is secure and meets the equivalent means of securement. If damaged or missing parts in the system are found during the inspection, the vehicle will be placed out of service under Part II, Item 2. a. General Securement.*

An update will be provided to the Cargo Securement Group on the activities related to this issue since the last meeting.

16. 23-039-VEH: OOSC, Part II, Item 2. Cargo Securement, n. Heavy Vehicles, Equipment and Machinery - Flatbed Trailers

Summary of Issue
Newer manufactured trailers, both 48 and 53 foot in length, are now coming in empty weights of under 10,000 lbs. When securing a trailer to a flatbed trailer, per 393.130 it would require a minimum of 4 tiedowns to properly secure. However, if the item is below 10,000lbs according to 393.130, it can be secured under 393.128 or 393.100-393.114. If securing under 393.128, it would only require 2 straps on a 48-foot trailer for proper securement if under 10,000lbs.

Justification or Need
If the trailer was secured under length and width, it would require 6 straps if 48 foot and no header board. 7 for 53 feet. The trailer if over 10,000lbs can be secured with 4 tiedowns, but if under it can be secured with just 2 per 393.128? Two would be enough to cover the weight, but it doesn't make logical sense to have 48 feet and only 2 straps on an item of a trailers size. Trailers are defined as a motor vehicle in 390.5 which fits into the wording of 393.130 as it is a heavy vehicle under Ops Policy 15 Cargo Securement (b)(10).

Request for Action
Request guidance on what securement is required for a trailer under 10,000lbs that is transported on a flatbed trailer? 393.130 allows for vehicles under 10,000 lbs. to be secured by either 393.130, 393.128, or 393.100-393.114. One is 4 tiedowns, one is 2, the other could be 6 or 7 depending on trailer length. What is correct securement minimum requirements?

Louisville Meeting
Marc Studer reported that the Cargo Securement Harmonization Public Forum reviewed this question in length and ultimately determined that there was no action necessary. However, after the meeting, further information was presented to the chairman and Marc requested that the issue remain open for further review by FMCSA. It had been reported in Ottawa that a regulatory amendment may be made in the Omnibus bill to clean up this issue.

Ottawa Discussion – For Review and Report to Vehicle Committee
Dave Sutula suggested to leave this open as it works through the omnibus process. Question arose over the safety of this as well as what is considered an acceptable attachment point on these trailers in these situations. Attendees in the room agreed that 393.128 shouldn't apply but based on the current language in the regulation, it does. This is a US issue and not Canadian issue as the language for heavy vehicles in the Canadian standard is not the same. It was recommended that the reference back to 393.128 for heavy vehicles should be removed. Dave Sutula indicated that more research may be necessary. The weight might be why the trailer would be considered a light vehicle. With lighter materials, traditionally the vehicles that would have weighed 10,001 pounds or more, now do not. This issue will be left open and Dave will report back in the spring.

There was no report on this in New Orleans.

The forum will receive an update from FMCSA.

17. 25-069-VEH: Part II - Item 2. Cargo Securement - Tiedown Defect Table

Submitted By: Francisco Rosales, FMCSA

Summary of Issue

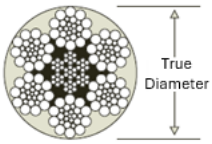
Some inspectors have difficulty converting the 6 diameters of length when identifying wire rope defects. The OOSC does not include a practical quick reference to assist inspectors in determining the length of a defect on a wire rope when there are more than 11 broken wires.

Justification or Need

Add a table to the OOSC that shows the wire rope size and defect length similar to the Defect Classification Table for synthetic webbing.

Request for Action

I recommend adding the attached Wire Rope Size Conversion Chart to the OOSC Tiedown Defect Table (wire rope). This chart will assist inspectors by providing a quick reference for determining the six 6 diameters of wire rope length, for defect identification. Two options below.

Wire Rope	• More than 11 broken wires in 6 diameters of length. For example: with 1/2 inch (12.7 mm) wire rope, more than 11 broken wires in (6 x 1/2) or 3 inches in length (6 x 13 = 78 mm). 	

WIRE ROPE DAMAGE CHART	
Diameter	Damaged Length
1/4“(6.4 mm)	1 1/2” (38.1 mm)
5/16” (7.9 mm)	1 7/8” (47.6 mm)
3/8” (9.5 mm)	2 1/4” (57.2 mm)
7/16” (11.1 mm)	2 5/8” (66.6 mm)
1/2” (12.7 mm)	3” (76.2 mm)
5/8” (15.9 mm)	3 3/4” (95.3 mm)
3/4” (19 mm)	4 1/2" (114.3 mm)
7/8” (22.2 mm)	5 1/4" (133.3 mm)
1” (25.4 mm)	6” (152.4 mm)

This issue was discussed in the Vehicle Committee in Denver in order for the updates to make it into the 2026 OOSC. The forum will be updated on the actions of the Vehicle Committee.

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18. New Business