The SOLAS Container Weight Verification Requirement
Verified Gross Mass (VGM)

18 November, 2015

Further to our advisory dated 3 August, 2015, we would like to inform our customers about the steps UASC has taken prior to implementation of the container weight verification requirement starting 1 July, 2016.

What are we doing to prepare for this regulation?

◆ The main change required to support the initiative is primarily IT related. Subsequently, we have held several internal discussions and meetings between operational, technical, commercial and IT relevant departments to comply with needed EDI changes as per SMDG recommendation. SMDG is a non-profit foundation which develops and promotes UN/EDIFACT EDI-messages for the Maritime Industry.
◆ We are working on an internal solution to our booking module in our main database including a general linking of our systems to help support the new requirements when they are implemented from 1 July, 2016.
◆ We are in regular discussions with other major shipping lines to help make this change as smooth and efficient as possible for you.

Important points to remember:

◆ If the Verified Gross Mass (VGM) is not provided, the container will not be loaded onto the ship.
◆ The responsibility for obtaining and documenting the Verified Gross Mass of a packed container lies with the shipper.

Please find below the VGM standard process and frequently asked Q&A’s

We will continue to keep you informed about these requirements. Please contact your local sales or customer service representative if you require further information or have any queries.

Yours sincerely,

United Arab Shipping Company (S.A.G.)

Disclaimer: This text has also been translated into [local language]. In the event of any conflict or discrepancy between the [local language] and English versions, the English version shall prevail.
Customer advisory

UASC VGM Standard Process

VERMAS

- INTTRA, GT Nexus, Portals
- VERMAS
- Booking Request
- Shipping Instructions

Shipper

Carrier

Terminal Operator

Vessel

- Copra
- Vermas (Job Order) for VAS only
- Coparn (Job Order) for VAS only
- Vermas
- Codeco
- Baplie

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Q&A’s Container weight verification requirements

Q: When did this requirement come about?
A: In November 2014, the International Maritime Organization (IMO) adopted mandatory amendments to the International Convention for the Safety of Life at Sea (SOLAS) Chapter VI, Part A, regulation 2 - Cargo information.

Q: What is SOLAS Convention / what are SOLAS amendments?
A: SOLAS convention is applicable global law. The SOLAS amendments become effective on 1 July 2016 for packed containers received for transportation (gate-in or off-rail). They place a requirement on the shipper of a packed container, regardless of who packed the container, to verify and provide the container’s gross verified weight to the ocean carrier and port terminal representative prior to it being loaded onto a ship.

Q: What does a carrier need to provide to shipper for the implementation of this requirement?
A: In order to implement the SOLAS regulatory obligations and to ensure the efficient and smooth flow of commerce, the parties in the supply chain will need to make arrangements for the timely transmission and exchange of verified container weight information. These are commercial and operational requirements, not regulatory requirements.

Q: What effect is the requirement likely to have on containerized supply chains?
A: The effect of these requirements on containerized supply chains is that the verification of the gross weight of a packed export container will be required before the container is loaded aboard a ship. To ensure compliance with the SOLAS amendments, participants within the supply chain (especially shippers, carriers, and terminal operators) will need to establish and implement processes to ensure that the verified container weights are provided to the necessary parties in a timely fashion and are used by the terminal operator and vessel operator in the vessel’s container stowage plan.
Q: What is a Verified Container Weight?
A: A verified container weight is a condition for loading a packed container aboard a vessel for export. The vessel operator and the terminal operator are required to use verified container weights in vessel stowage plans and are prohibited from loading a packed container aboard a vessel for export if the container does not have a verified container weight.

Q: What are the methods for obtaining the verified gross mass of a packed container?
A: Method 1
Upon the conclusion of packing and sealing a container and using calibrated and certified equipment, the shipper may weigh, or have arranged that a third party weigh, the packed container. The scale, weighbridge, lifting equipment or other devices used to verify the gross mass of the container must meet the applicable accuracy standards and requirements of the States where the equipment is being used. IMO Guidelines, paragraph 7.1. Method 1 is appropriate to use for any packed container and any kind of goods.

A: Method 2
The shipper (or, by arrangement of the shipper, a third party) may weigh all packages and cargo items, including the mass of pallets, dunnage and other packing and securing material to be packed in the container, and add the tare mass of the container to the sum of the single masses of the container’s contents. IMO Guidelines, paragraph 5.1.2.

- The weighing equipment used to weigh the contents of the container must meet the applicable accuracy standards and requirements of the States in which the equipment is being used. IMO Guidelines, paragraph 7.1.
- The tare mass of the particular container is visible on the exterior of the container and should be used. IMO Guidelines, paragraph 12.1.
- Estimating the weight of a container’s contents is not permitted.
- The party packing the container cannot use the weight somebody else has provided, except in one specific set of defined circumstances where the cargo has been previously weighed and that weight is clearly and permanently marked on the surface of the goods.
- Method No. 2 is “inappropriate and impractical” for “certain types of cargo items (e.g., scrap metal, unbagged grain and other cargo in bulk)” that “do not easily lend themselves to individual weighing of the items to be packed in the container.” IMO Guidelines, paragraph 5.1.2.2.
- Method No. 2 is also inappropriate for “flexitanks”. For such cargoes, Method No. 1 must be used. The method used for weighing the container’s contents under Method No. 2 is subject to certification and approval as determined by the competent authority of the State in which the packing and sealing of the container was completed. IMO Guidelines, paragraph 5.1.2.3.
- Shippers are responsible for complying with any certification and approval requirements that may be established by the State in which the container packing is done or in a case where a container is packed in multiple places, any certification and approval requirements that may be established by the State where the last contents were packed into the container.

A: Weights obtained by weighing the entire packed container under Method 1 or by weighing the contents of the container and adding those weights to the container tare weight under Method 2 are to be as accurate as the scales or weighing devices used, which must meet the applicable accuracy standards and requirements of the States in which the equipment is being used.

Q: Who is the party responsible for providing the packed container weight verification?
A: The SOLAS amendments and the IMO Guidelines are clear that the shipper named on the ocean carrier’s bill of lading is the party responsible for providing the packed container’s verified gross mass. IMO Guidelines, paragraph 5.1.3. Thus, for example, if a freight forwarder/NVOCC is co-loading the cargo shipments of other freight forwarders in a container, the “master” forwarder named on the ocean carrier’s bill of lading is the party responsible for the accurate cargo weight verification of all the cargo and all packing or securing material from all the co-loading forwarders using the container.

Q: Is there a reference for party/parties to follow provisions on packing of cargo/container?
A: The party or parties packing the container should follow the provisions of the IMO/ILO/UNECE Code of Practice for Packing of Cargo Transport Units (CTU Code) in relation to load distribution and safe packing of the container. The IMO/ILO/UNECE Code of Practice for Packing of Cargo Transport Units (CTU Code) and the CTU Code Informative Materials can be found at: http://www.worldshipping.org/industry-issues/safety/containers
Q: How is the Documentation process?
- The SOLAS regulations require the shipper to verify the gross mass of the packed container using Method No. 1 or Method No. 2 and to communicate the verified gross mass in a shipping document. This document can be part of the shipping instructions to the shipping company or a separate communication (e.g., a declaration including a weight certificate produced by a weigh station using calibrated and certified equipment on the route between the shipper's origin and the port terminal). In either case, the document should clearly highlight that the gross mass provided is the “verified gross mass”. The verified weight should be expressed in kilograms or pounds, depending on which measure is used in that jurisdiction. Electronic methods of transmission such as Electronic Data Interchange (EDI) or Electronic Data Processing (EDP) may be used. IMO Guidelines, paragraph 6.3.
- Irrespective of its form, the document declaring the verified gross mass of the packed container must be signed by a person duly authorized by the shipper. The signature may be an electronic signature or may be replaced by the name in capitals of the person authorized to sign it. IMO Guidelines, paragraph 6.2.
- Any discrepancy between a packed container’s gross mass provided to a carrier by a shipper prior to the container’s weight verification and its verified gross mass should be resolved by use of the verified gross mass. IMO Guidelines, paragraph 9.1. If a port terminal addresses an uncertainty about the gross mass of a packed container by weighing the container, the weight obtained by the port facility should be used for vessel stowage planning. IMO Guidelines, paragraph 9.2 and 13.1.
- The shipper’s container weight verification shall be made available to the terminal operator and to the master and to appropriate government officials upon request.

Q: Is the carrier and the terminal operator responsible on the weight verification process?
A: The carrier and terminal operator may rely on a shipper’s signed container weight verification to be accurate. The carrier and the terminal operator are not responsible for verifying the shipper’s weight verification. Nor do the SOLAS amendments or IMO Guidelines require a carrier or terminal operator to verify that a shipper providing a verified weight according to Method 2 has used a method which has been certified and approved by the competent authority of the jurisdiction in which the packing and sealing of the container was completed. However, for the shipper’s weight verification to be compliant with the SOLAS requirements, it must be “signed”, meaning a specific person representing the shipper must be named and identified as having verified the accuracy of the weight calculation on behalf of the shipper.

Q: What is the action to take when error on the verified weight is found?
A: If a carrier or terminal operator has reason to believe that the verified weight of the container provided by the shipper is significantly in error, they may take such steps as may be appropriate in the interest of safety to determine what the accurate weight is. The terms of such arrangements and the recovery of the costs involved in any steps for obtaining an accurate weight are commercial matters for the parties to address.

Q: What to do if a container is found to exceed their maximum gross mass?
A: SOLAS regulation VI/5 requires that a container not be packed to more than the maximum gross mass indicated on the Safety Approval Plate under the IMO’s Convention for Safe Containers (CSC), as amended. A container with a gross mass exceeding its maximum permitted gross mass may not be loaded onto a ship.
A: In addition to not packing a container beyond its maximum gross mass, the party packing a container should be aware of and abide by cargo weight distribution and cargo securing requirements for the particular type(-s) of cargo packed into the container. The IMO/IL0/UNECE Code of Practice for Packing of Cargo Transport Units (CTU Code) and the CTU Code Informative Materials can be found at: http://www.worldshipping.org/industry-issues/safety/containers

Q: What is AEO (Authorized Economic Operator)?
A: A shipper’s participation or approval under a Customs authority’s Authorized Economic Operator (AEO) or similar program does not modify or exempt the shipper from required compliance with the SOLAS requirements. Such status might be a relevant factor in a State’s certification and approval requirements for Method No. 2 shippers. Shippers should be aware of any such applicable national requirements.
Q: What if the container weight verification is performed outside a container terminal?
A: Where container weight verification is performed outside a container terminal, carrier shall transmit shippers’ container weight verifications to the terminal operator, per agreed formats and standards, in a timely manner so that the terminal operator has this information upon the arrival of the packed container at the terminal.

Q: What are the terminal operators’ requirements?
- Terminal operators will need to transmit to the carrier, per agreed formats and standards, in a timely manner any shipper provided container weight verification that the shipper provides to the terminal upon delivery of the packed container to the terminal operator, as well as weight verifications that occur when a terminal operator weighs a packed container on behalf of the shipper.
- Terminal operators will need to jointly decide in advance how they intend to handle packed containers that are received by a terminal operator for export when: a) the carrier has not informed the terminal operator of the container’s verified weight, or b) when the shipper has not provided the carrier or terminal operator with the packed container’s verified container weight.
- If a terminal operator makes arrangements for determining the verified gross mass of a packed container that is delivered to the port by a shipper without a verified gross mass, the cost for such service will have to be borne according to the terms of the commercial arrangements among the affected parties, with the recognition that the SOLAS amendments place the obligation on the shipper to provide the verified weight in the first instance. A shipper should recognize that, if it fails to provide a verified container weight as called for by the SOLAS amendments and such failure requires a terminal operator to use Method No. 1 to obtain a verified container weight, there will be a cost for such services that the affected parties will need to address.

Q: What about VSAs or vessel sharing agreements?
A: With respect to vessel sharing arrangements (VSAs) where more than one ocean carrier is using the vessel to transport goods, the vessel operator is responsible for the vessel stowage and for the vessel’s compliance with SOLAS requirements. Each VSA partner is responsible for timely transmission of verified container weights for all packed containers to be loaded to the terminal operator and to the vessel operator.
A: The final vessel stow plan should include a check mark or notation that allows the master to see that each packed container in the stowage plan has a verified weight, and the stow plan shall include the verified weights for every packed container aboard.