



# Safety of Life at Sea (SOLAS) Verified Gross Mass (VGM)

*Background on the new IMO requirements scheduled to become effective July 1, 2016 and general FAQ regarding MOL's implementation procedures.*

*(As of February 24, 2016)*



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# Background



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## Before 2014

- SOLAS convention only required that prior to loading a shipper must:
  - Provide ship's master or representative with the gross mass of the container.
  - Ensure the actual gross mass is in accordance with the declared gross mass.
- No effective enforcement in most jurisdictions.
- No IMO requirement to verify actual weights.

## Key points

- Despite industry efforts to reduce incidences of shippers providing incorrect container weights, the problem continues.
- The problem is significant and arises in almost every trade and in some trades, it is rampant.
- An investigation of an ocean carrier's structural failure incident in 2007 found that 20 percent of the containers on deck had actual weights that differed more than three tons from their declared weights and that the largest difference was 20 tons. It was also found that the total weight of the 20 percent misdeclared containers was 312 tons heavier than indicated on the cargo manifest (gross mass declared by shippers) in shipping instructions provided to the ocean carrier.
- In October 2012, over a two-week period, Ukraine Customs weighed all containers discharged in Ukrainian ports. It was found that 56 percent of the containers had an actual weight greater than the weight stated in the carrier's cargo manifest. Similar findings have been reported by other customs agencies.

➤ ***Consequences of misdeclared weights lead to: Risk of personal injury or death to crew and shore side workers, ship instability, incorrect vessel stowage, collapsed container stacks , re-handling and re-stowing, higher operating costs, chassis and ship damage, supply chain delay, shut-out of accurately declared cargoes, road safety problems, etc...***

Source: World Shipping Council – SOLAS Weight Requirements





# What is Changing?



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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.

*SOLAS convention is applicable global law. The SOLAS amendments become effective on **July 1, 2016** for packed containers received for transportation (gate-in or off-rail).*

## New SOLAS amendments basic principles

1. Before a packed container can be loaded onto a ship, its weight must be determined through weighing – A verified weight is a condition for loading a packed container onto a ship. **No Verified Weight means No Load.**
2. Estimating weight **is not permitted**. Shippers must weigh or arrange for weighing of packed container or its contents.
3. Two permissible methods for weighing:  
**Method 1:** Weigh the packed container.  
**Method 2:** Weigh the cargo and other contents and add tare mass of the container. (*Packages that have the accurate mass clearly and permanently marked on their surfaces do not need to be weighed again when they are packed into the container.*)
4. Shipper may rely on beneficial cargo owners (BCO's) or other forwarders' properly derived weights, using Method 1 or 2. **But -- shippers remain responsible for verified weight. "Shipper" means the party identified on the maritime carrier's Bill of Lading.**
5. Governments may apply **enforcement** tolerance limits. Does **not** relieve the shipper from obligation to provide verified weight obtained from weighing.
6. Lack of signed shipper weight verification can be remedied by weighing the packed container at port or elsewhere. **Subject to the Carriers and port terminals to agree on how such situations will be handled.**
7. Government implementation - Commercial parties need to understand and arrange **for compliance with national/local requirements** (e.g., certification and documentation.)





# ***MOL Implementation Frequently Asked Questions***



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## **What is the timing of (or when is) MOL's VGM cut-off requirement?**

VGM cut-off date/time are likely to vary from country to country, from port to port, from terminal to terminal. VGM cut-off time in MOL's operational understanding is 'at the latest' at CY cut-off time. However, we cannot establish a standard to be applied globally.

## **On July 1, 2016, what is the "actual" effective date for your company to enforce the VGM transmission? (For example, if a container is loaded before July 1, 2016 but transships after July 1, 2016.)**

The effective date will be as from the **first** IMO loading port on or after July 1, 2016.

## **How and when will MOL transmit VGM data to the terminal?**

MOL will send VGM data to the terminal by EDI according to agreed/required schedule.

## **In what format will MOL receive the VGM from customers?**

MOL will accept electronic or digital format (EDI, Portal, email) and encourage customers to send VGM by EDI or online input via web portal in MOLpower.com.

## **Which VGM data elements are required to be transmitted?**

According to SOLAS requirement for VGM, the basic information is VGM, full name of "verifier" in shipper, date of weighing and container number. For MOL internal control purposes, we will also request the booking number to link with VGM basic information and will request as mandatory any additional items demanded by local regulatory requirements.





# ***MOL Implementation Frequently Asked Questions***



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**If hard copy VGM certificates are submitted, what is MOL's internal process to enter/relay this information to the terminal?**

At this point there is no identified need for hard copy of VGM certificates from shipper/weighing company.

**In what format will MOL receive Shipper Verification with Signature?**

MOL will require the signature field in "Capital letter" from any submission method, via EDI, MOLPower.com, email, etc.

**Will MOL have a weight tolerance acceptance for the VGM of a container? And does it apply as a global standard?**

MOL will continue to review any accommodative tolerance range/ranges in line with local/international regulatory acceptance standards.

**If there is no VGM information when a packed container is "gate-in" at terminal?**

Each terminal may have its own local rule/practice whether to allow containers to 'gate-in' without VGM. Should a container be accepted by the terminal, following SOLAS requirement a unit cannot load without fulfilling VGM. MOL may accept VGM information after container gate-in as long as it does not create constraints with operational procedure.

**Do the G6 Alliance members have a common understanding regarding SOLAS requirements?**

A process of VGM information exchange among the partners will be defined upon the understanding of common procedures.





# Additional References



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## How to meet the container weight mandate

### As a shipper, what are your options?

#### OPTION A.

Take a loaded container over a **weighbridge**, subtract the weight of the truck, chassis, and fuel to get the weight of the packed container.



Scales must be certified and calibrated in line with the national standards of the country where the weighing occurred.

#### OPTION B.

Weigh each item – **including its packaging, palleting, dunnage and other packing and securing materials** – going into the box.

Add that sum to the weight of the container to find the weight of the packed container.



### What are you required to do?

Provide a document signed by the shipper to the shipping line and terminal declaring that the **shipper verified** the weight and that it was weighed properly.



The SOLAS amendment will be enforced by the coast guard or other agency responsible for SOLAS regulations in a given country and punishments for violations will vary by country.

### What happens in the case of noncompliance?

There are all kind of possibilities for what could happen to the box that failed to provide the certified weight document but none are settled.

Terminals may choose to hold a container or send it back, but whatever happens, the ship will leave and the container will not.



Source: World Shipping Council.

<http://www.worldshipping.org/industry-issues/safety/cargo-weight>

[http://www.worldshipping.org/industry-issues/safety/WSC Guidelines for Implementing the SOLAS Container Weight Verification Requirement.pdf.](http://www.worldshipping.org/industry-issues/safety/WSC_Guidelines_for_Implementing_the_SOLAS_Container_Weight_Verification_Requirement.pdf)

[http://www.worldshipping.org/industry-issues/safety/faqs/SOLAS VGM Industry FAQs Dec 2015 US letter WEB.pdf](http://www.worldshipping.org/industry-issues/safety/faqs/SOLAS_VGM_Industry_FAQs_Dec_2015_US_letter_WEB.pdf)

<http://www.worldshipping.org/industry-issues/safety/containers>

**If you have further questions, please contact your local MOL Liner office.**

Source: Journal of Commerce





# Disclaimer



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# Thank You



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