



SOLAS CONTAINER WEIGHT VERIFICATION

BACKGROUND

In May 2014, the International Maritime Organization's (IMO) Maritime Safety Committee (MSC) approved changes to the Safety of Life at Sea (SOLAS) convention regarding a mandatory container weight verification requirement for shippers of containerized cargo. Specifically, the Dangerous Goods, Solid Cargo and Containers (DSC) Sub-committee approved changes to the Safety of Life at Sea (SOLAS) convention that will require verification of container weights before placing loaded containers aboard ships. The requirement making container weight verification a condition for vessel loading will become legally binding on July 1, 2016.

Who has adopted this requirement?

All [IMO member countries](#), more than 170 countries, have adopted this requirement.

What is VGM?

Verified gross mass means the weight of each packed container can be proven. This weight is determined by adding the weight of all packages and cargo items in the container, plus the mass of

pallets, all packing and securing material, and the tare weight of the container. Essentially, the VGM is the total weight of the package that will be lifted aboard the vessel.

How can VGM be determined?

There are two ways to determine a VGM in accordance with the new SOLAS regulation:

- **Method 1 - Weighing:** The shipper, or third party contracted by the shipper, weighs the container after it has been completely packed and sealed.
- **Method 2 - Calculating:** The shipper, or third party contracted by the shipper, weighs all packages and cargo items (including the mass of pallets, dunnage, and other packing and securing material). Then the tare weight printed on the container is added to the sum of the container's contents.

The method used for weighing the container's content is subject to the certification and approval as determined by the competent authority of the state in which the container was packaged and sealed.

Are there any requirements about which scales should be used to determine VGM?

There are no specific requirements given by the IMO. However, any scale, weighbridge, lifting equipment or other devices used to verify the gross mass of a container must meet the applicable accuracy standards and requirements of the state or country in which the equipment is used.

How does the shipper prove that the submitted weight is a VGM? The document declaring the VGM, including EDIFACT messages, must be signed by a person duly authorized by the shipper or non-vessel operator (NVO) where the NVO issues its own bill of lading (B/L). This signature may be an electronic signature or may be replaced by the name in capital letters of the person authorized to sign. In cases where the NVO appears as the shipper on the carrier ocean B/L, the NVO will want to consider the industry standard "back to back bill of lading" implications.

Who is responsible for submitting the VGM to the carrier and terminal representative?

The shipper is responsible for the verification of the gross mass of a container, as well as for ensuring that the VGM is communicated to the carrier and terminal representative.

How can VGM be submitted to the carrier and terminal representative?

The shipper provides the VGM as part of a shipping document (i.e. booking request, shipping instructions or declaration) through an e-channel or their current shipping information submission channel to carrier. In addition, a new, dedicated EDIFACT message, called VERMAS, has been developed to allow the sending of VGM information.

What information should be included in the VGM submission?

The following information is mandatory in a VGM submission:

- Ocean Carrier Booking Number
- Container Number
- Verified Weight
- Unit of Measurement
- Responsible Party (Shipper named on the carrier's bill of lading)
- Authorized Person

The following information can be included in a VGM submission, but is not required:

- Weighing Date
- Shipper's Internal Reference
- Weighing Method
- Ordering Party
- Weighing Facility
- Country of Method 2
- Documentation Holding Party

Does a weight ticket need to be submitted with the VGM?

There is no requirement that a weight ticket or similar document be provided with the VGM submission.

When must the VGM be submitted?

There is no firm deadline set by the SOLAS regulation. However, the shipper needs to submit the VGM prior to arriving at the Port of Loading (POL) and early enough for the carrier to use the VGM in its stowage plan. In March 2016, the Ocean Carrier Equipment Management Association (OCEMA) issued [best practice guidelines](#) that discuss the VGM cutoff for U.S. exports.

What are the consequences or penalties when a VGM is missing when it arrives at the POL?

The requirement is clear that containers without a VGM at POL should not be loaded onto the vessel until the VGM has been obtained. The shipper is responsible for any costs that arise (e.g. but not limited to weighing costs, repacking, storage, demurrage and administrative costs). While most countries have not yet determined penalties for non-compliance, the time delays and possible additional costs are expected to exceed any actual official penalties assessed.

Is there an allowable margin of error for VGM?

There is no provision within the SOLAS regulations for any margin of error. This means each IMO member country will decide how the VGM issues are regulated. Several countries have published variance guidelines, including the U.K and Canada. The enforcement threshold for both of these countries is ± 5 percent of the VGM of the container.

What about less than container load (LCL) shipments and consolidated containers?

A VGM submission is required for both LCL and consolidated containers. The responsibility for providing the carrier the VGM for the container remains with the shipper. However, in the case of consolidated shipments, the shipper is the “master” freight forwarder.

Has every IMO country developed its guidelines and regulations for VGM implementation?

Some, but not all, IMO countries have developed its guidelines and regulations for VGM implementation. The World Shipping Council continues to publish [guidelines and regulations on its website](#) as they are updated.

What can you do to protect your company?

You should ensure that you are using the most up to date Terms & Conditions on your transportation documents. Integro can assist you in addressing potential liability associated with SOLAS. Some coverage options available through Integro’s Logistics Liability program include:

- Errors and/or Omissions in transmitting VGM data
- Liability including but not limited to cargo delays, holds, third party losses
- Claims by an Authority
- Fines & Penalties
- Abandoned or Uncollected Cargo
- Sudden & Accidental Pollution

If you do not currently have coverage in place, or have questions about your existing policy please contact your Integro representative.

ADDITIONAL RESOURCES:

OCEMA Recommended Best Practices for the Acceptance and Transmission of Verified Gross Mass: <http://www.ocema.org/docs/OCEMA%20VGM%20Best%20Practice.pdf>

International Maritime Organization Members: <http://www.imo.org/en/About/Membership/Pages/MemberStates.aspx>

The World Shipping Council VGM Regional Implementation Information: <http://www.worldshipping.org/industry-issues/safety/global-container-weight-verification-rule-effective-july-1-2016>

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