



# SOLAS Regulation 2 Verified Gross Mass

## *FAQ's for ITCO Members*

In preparation for the Introduction by the IMO of SOLAS Regulation for Verified Gross Mass of Containers, the ITCO Secretariat has prepared answers to a number of FAQs (Frequently Asked Questions). In addition to the information supplied, please also see the links at the end of the document for addition information. If you have any further questions, please contact: [hicks@itco.be](mailto:hicks@itco.be)

### **1. What is the new regulation?**

International Convention for the Safety of Life at Sea (SOLAS), as amended Chapter VI Part A, Regulation 2 (verified gross mass).

### **2. Why is there verified gross mass regulation?**

It results from marine investigations that reported container mis-declared weights were a factor in a number of incidents involving ship safety. In one case, a container ship broke up and had to be beached to avoid a complete loss of the vessel.

### **3. When does the regulation come into force?**

1 July 2016

### **4. What is the recommendation for ITCO tank container operators?**

Plan ahead. Make preparations as appropriate. Be aware of: [MSC.Circ.1475 June 2014 Guidelines Regarding The Verified Gross Mass Of A Container Carrying Cargo](#). Also, any additional local country/state issued guidelines. Communicate with shippers, shipping lines, ports and agents/local offices to arrange local procedures.

### **5. Are there guidelines to the regulation?**

[MSC.Circ.1475 June 2014 Guidelines Regarding The Verified Gross Mass Of A Container Carrying Cargo](#).

Individual States might also publish guidelines. Shipping lines and trade organisations publish information on their websites. OCEMA (association of ocean common carriers) issued guidelines. See links below.

### **6. Who is responsible to declare verified gross mass?**

The responsibility for obtaining and documenting the verified gross mass of a packed container lies with the shipper. (see: [MSC.1/Circ. 1475, 1.1, 4.1](#))

### **7. Who is “the shipper”?**

“Shipper” means a legal entity or person named on the bill of lading or sea waybill or equivalent multimodal transport document. (See: [MSC.1/Circ.1475 2.1.12](#))

### **8. How is the verified gross mass measured?**

**Method No.1:** Upon the conclusion of packing and sealing a container, the shipper may weigh, or have arranged that a third party weighs, the packed container.

**Method 2** Weigh cargo items, add to container tare mass. 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 using a certified method as described in paragraphs MSC.1/Circ.1475 5.1.2

#### **9. Who will implement the certification?**

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.

#### **10. How will the certification be implemented?**

How the certification is to be done will be up to the State concerned, and could pertain to either the procedure for the weighing or to the party performing the weighing or both. (MSC.1/Circ.1475, 5.1.2.3, 5.1.2.3.1)

#### **11. Is Method 2 acceptable for bulk liquids?**

Certain types of cargo items (e.g. scrap metal, unbagged grain and other cargo in bulk) do not easily lend themselves to individual weighing of the items to be packed in the container. In such cases, usage of Method No.2 would be inappropriate and impractical, and Method No.1 should be used instead. (MSC.1/Circ.1475 5.1.2.2)

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. (MSC.1/Circ.1475 5.1.2.3)

How the certification is to be done will be up to the State concerned, and could pertain to either the procedure for the weighing or to the party performing the weighing or both. (MSC.1/Circ.1475 5.1.2.3.1)

#### **12. It is an established requirement to declare gross weight. What is the difference in the new regulation?**

The regulation prescribes two methods to verifying the gross mass. It might be that these methods have been used previously, but the regulation now refers bulk cargo to **Method 1** and requires the shipping document to refer to the "verified gross mass".

#### **13. Is it acceptable to fill the tank via a calibrated flow meter and comply with method 2?**

A flow meter is not specified within the guidelines as a means to measure the mass of bulk liquids. If permitted, a flow meter could be utilized to provide an accurate cargo mass and applied to Method 2. This raises the question of the regulation taking precedence over the guidelines and is a matter to be considered by the State concerned. (MSC.1/Circ.1475 5.1.2.2, MSC.1/Circ.1475 5.1.2.3.1)

#### **14. What are the required documents?**

The shipper has 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 utilizing 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". (MSC.1/Circ.1475 6.1)

#### **15. Who signs the document?**

Irrespective of its form, the document declaring the verified gross mass of the packed container should 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. *(MSC.1/Circ.1475 6.2)*

#### **16. What procedures will be required by the port terminal and the shipping line?**

It is necessary to refer to the local representatives to establish precise procedures. Guidelines are provided in Circ.1475 Section 6, summarized below. Also see OCEMA guidelines in the link below which provide the Ocean Carriers procedures.

- Verified gross mass of a packed container be provided, preferably by EDI/EDP, to the ship's master or his representative and to the terminal representative sufficiently in advance of ship loading to be used in preparation of the ship stowage plan.
- Because the contract of carriage is between the shipper and the shipping company, the shipper may meet its obligation by submitting the verified gross mass to the shipping company.
- It is then the responsibility of the shipping company to provide information to the terminal representative.
- Similarly, the shipper may also submit the verified gross mass to the port terminal facility representative upon delivery of the container to the port facility in advance of loading.
- The master or his representative and the terminal representative should enter into arrangements to ensure the prompt sharing of verified container gross mass information provided by shippers. *(MSC.1/Circ.1475 6)*

#### **17. Is the industry infrastructure in place?**

Infrastructure to carry out weighing is expected to vary by location - but recent press reports indicate that lack of infrastructure (e.g weigh bridges) might result in congestion.

#### **18. Is the regulation to be enforced in the USA ?**

The US Coast Guard made a statement ([link below](#)) that indicates that the onus is on the shipping industry to comply with relevant parts of regulation. SOLAS is relevant to the ship's master not to load boxes onto the vessel without VGM and in this sense the regulation is enforced in the USA and elsewhere.

Circ.1475 states that 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.

How the certification is to be done will be up to the State concerned, and could pertain to either the procedure for the weighing or to the party performing the weighing or both. *(MSC.1/Circ.1475, 5.1.2.3, 5.1.2.3.1)*

#### **19. Does VGM apply to empty containers?**

MSC.Circ .1475 Guidelines Regarding The Verified Gross Mass of a Container Carrying Cargo states that the "The shipper is responsible for the verification of the gross mass of a container carrying cargo (hereinafter "a packed container").

The Circular states a "Packed container means a container, as previously defined, loaded ("stuffed" or "filled") with liquids, gases, solids, packages and cargo items, including pallets, dunnage, and other packing material and securing materials"

Accordingly, an empty container is not subject to VGM. However, since the container is empty, if a VGM were to be required (as apposed to the current requirement of declared

weight) Method 1 would be appropriate – tare mass + zero = tare mass.

**20. Is MSC.Circ.1475 applied globally regarding empty containers?**

The regulation and guidelines refer to packed containers. At the time of writing no information has been received concerning empty containers. The interpretation of VGM for empty containers might vary by State.

**21. Do shipping lines require a VGM for empty containers?**

Shipping Lines terms and conditions apply in regard to the definition of an empty container shipment. Shipping Lines might require a VGM for purpose of standardization with loading processes rather than the current requirement of declared weight. However, since the container is empty the tare mass could be stated as the VGM since Method 1 would be appropriate – tare mass + zero = tare mass.

**22. What is the requirement for tank containers shipped as empty un-cleaned that might contain un-measurable traces of residue?**

Notwithstanding a ruling of the definition of an empty container and the shipping line terms and conditions, the shipper of an empty tank should be assured that the tank is free of cargo. In the context of a 3800kg tare mass tank shipped as empty, except for reported traces of residue, a weighbridge with a calibrated 2% tolerance, could not be expected to measure cargo residue traces of say up to 10kg.

**23. What is the requirement for tank containers shipped as empty un-clean and containing measurable residue?**

Notwithstanding a ruling of the definition of an empty container and the shipping line terms and conditions, the shipper of an empty tank should be assured that the tank free of cargo. If the un-cleaned tank is reported to contain measurable residue, or if it is not known if the extent of residue is measurable, it is appropriate to weigh the tank i.e. use Method 1 and report the VGM.

**24. Where can I obtain more information?**

This FAQ is intended to provide assistance to ITCO members. However, for specific information and guidance the responsible State and the shipping line should be consulted. In addition, substantial information from the trade press, trade associations and other relevant organisations. Please search the web including the following links:

[http://www.worldshipping.org/industry-issues/safety/MSC\\_1-Circ\\_1475 -  
\\_Guidelines\\_Regarding\\_The\\_Verified\\_Gross\\_Mass\\_Of\\_A\\_Container\\_Carrying\\_Cargo -  
Secretariat-.pdf](http://www.worldshipping.org/industry-issues/safety/MSC_1-Circ_1475_-_Guidelines_Regarding_The_Verified_Gross_Mass_Of_A_Container_Carrying_Cargo_-_Secretariat-.pdf)

<http://www.ttclub.com/news-events/articles/article/why-weight-134091>

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

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

<http://ichca.com/container-weighing>

[http://www.bifa.org/media/3820205/solas\\_vgm\\_industry\\_faqs\\_dec\\_2015.pdf](http://www.bifa.org/media/3820205/solas_vgm_industry_faqs_dec_2015.pdf)

<https://www.gov.uk/government/publications/verification-of-the-gross-mass-of-packed-containers-by-sea>

<http://mariners.coastguard.dodlive.mil/2016/03/02/322016-solas-amendments-to-container-weight-requirements-new-faqs-published/>

<http://www.ocema.org/docs/OCEMA%20VGM%20Best%20Practice.pdf>

<http://www.maerskline.com/en-us/shipping-services/verified-gross-mass>

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