

SOLAS - Are you ready?

From July 1st, 2016 the amended SOLAS Guidelines will come into force. Freightlane explains how to meet the new requirements regarding the verification of the gross mass of packed containers.

What is SOLAS?

SOLAS Guidelines

To ensure the safety of the vessel, cargo, workers both aboard vessels and ashore and overall safety at sea, the International Maritime Organization (IMO) will require shippers (“sender of the goods”) to declare the gross weight of all packed containers prior to stowage aboard a vessel as of **July 1st, 2016**.

The Guidelines regarding the verified gross mass of a packed container are the outcome of the International Convention for Safety of Life at Sea (SOLAS), adopted by the International Maritime Organization (IMO), which are to be implemented in national legislation in all countries, worldwide.

What is Verified Gross Mass (VGM)?

The Verified Gross Mass is the total gross mass of a packed container including container tare weight; obtained either through:

- Using calibrated and certified equipment where the Shipper weighs the packed container at the end of the stuffing operation; or,
- The shipper weighs all packages, cargo items, pallets, dunnage and other packing and securing material and adds the tare mass of the container. The total sum finally obtained is the weight to be provided.

When is the Verified Gross Mass required?

A packed container will not be loaded on board a vessel unless the Verified Gross Mass (VGM) of a container has been provided to the Carrier and Terminal, or their representatives, sufficiently in advance.

Who is responsible to provide the Verified Gross Mass?

The Shipper is responsible to obtain and document the Verified Gross Mass regardless of who physically transports the cargo. In the UK, this is policed by the [MCA](#) (The Marine & Coastguard Agency). Full details of UK legislation to meet the above can be found on the MCA website, [here](#).

What if I don't provide a VGM?

The shipper has to communicate the VGM in 'a shipping document' or a 'separate communication'. The format of these documents are not specified in guidelines at this point so may be an adaptation of a current document.

The document must be signed (or signed electronically) or replaced by the name, in capitals, of a person duly authorised by the shipper.

Without a VGM, a container is not permitted to be loaded onto a ship - port operators must have operational procedures that will ensure this.

Okay, so what do I have to do?

There are two methods you can use to comply with SOLAS regulations for UK Exports:

Method 1

Weighing each container and contents together. Method 1 users are **NOT** required to register with the MCA but shippers using this method must be able to produce, on request:

1. Records of maintenance and calibration procedures for weighing apparatus including any corrective/remedial actions taken and

2. Evidence that the weighing apparatus has been supplied/maintained for the purpose of determining a VGM and is capable of producing a 'ticket' (physical or electronic record) including container number and the VGM.

Method 2

Weighing the full content of the container (including all packaging) and then adding the actual tare weight of the container. For a shipper to use Method 2, they have to demonstrate their competence by providing detail of an appropriate management system for the process, sufficiently robust to withstand possible future audit.

Alternatively, they can be an [AEO](#) (Authorised Economic Operator), with weighing systems that meet the above requirements already in place. Specific approval and accreditation is required for either under Method 2.

The UK body responsible for policing the legislation **and** approving procedures is the [MCA](#).

- Once a shipper has been approved and accredited by the MCA they will become a 'verified weigher', given a PIN Number and entered on a dedicated central database which can be accessed by authorised parties as required.
- Annex 2 of MGN 534 gives details of the application process and the MCA have already started the process of approving applications.
- Applications should be made via the MCA's dedicated email address as below: container.weight@mcga.gov.uk
- Once processing of the application has started, the shipper will be contacted with their application number and details of how to make the payment for processing. In depth explanations can be found [here](#).
- Applications, and/or specific questions on application for approval, as per the guidance provided in Annex 2 of MGN 534 should be made to container.weight@mcga.gov.uk. Alternatively, applications may be made by post to:

Container Weighing, Maritime and Coastguard Agency, Bay 2/29, Spring Place, 105 Commercial Road, Southampton, SO15 1EG.

- The Responsible Officer at the MCA is Keith Bradley who can be reached by phone at: +44 (0) 23 8032 9141.
- The application process is short and to the point. It has been advised, by the responsible officer at the MCA (Keith Bradley), that providing applications have been properly completed, paid for and **received by the MCA prior to 15 June 2016** they will be processed in time for the implementation date of **1 July 2016**.
- Use of the indicative application form, as found in the appendix, is recommended by the MCA. The person responsible for the process and ensuring that it is followed should be the signatory.

Sample Application Document

Full company name and address, if appropriate specify head office

Name(s) of responsible person(s) operations director / logistics personnel etc.

For multiple sites, the addresses where verified weighing will be undertaken

For shippers who have contracted out provision of VGM, Full company name and address of Method 2 provider

Name(s) of responsible person(s) operations director / logistics personnel etc.

Check list of additional elements of a documented procedure for a “Method 2” shipper:

Document number	Document type, supplied as evidence	tick if example attached	MCA Use Only
1	Copy of certificate(s) where processes are already audited as part of a management system e.g. ISO 9000		
2	Specify / describe the weighing method to be used		
3	Detail what weighing equipment is to be used as part of the documented procedure		
4	Equipment maintenance procedures		
5	Equipment verification (calibration) procedures (including whether there are periodic internal checks)		
6	Discrepancy procedure		
7	reporting and quarantining of faulty equipment		
8	Record retention		
9	Training		
10	other documents, if applicable – please provide details		

Date submitted:

Name of person responsible: