



Loading a packed container without a verified weight to be a violation of SOLAS

This Insight looks at some of the industry confusion and insurance issues arising from the new SOLAS requirement for declaration of a “verified gross mass” (VGM) for containers coming into force on 1 July.

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A recent survey by an online cargo booking organisation has found that two thirds of its customers thought there would be a moderate or major disruption in the industry when the rules came into force. With a reported 150 million TEU shipped globally, 99 per cent said to be subject to [SOLAS regulations](#), the changes look set to pose a number of challenges for stakeholders.

Background

Quite apart from weight mis-declaration having an adverse effect on ship stability and structural strength, the loss of containers overboard has been a [growing concern](#). Furthermore, a common factor in stack collapse cases [is the exceeding of tier and/or stack weight limits](#). Risks to crew safety also extend to shore workers handling containers that may collapse under their own weight or cause dangerous situations when shore equipment is overloaded. Governments and industry were agreed that something needed to be done and following many years of consultation the changes were adopted by the IMO in November 2014.

The new requirements

The new IMO requirements can be summarised as follows:

- All containers containing cargo shall have a VGM and this responsibility lies with the shipper.
- The shipper can chose from two methods for determining the VGM:
 1. To weigh the container after it has been packed using calibrated and certified equipment
 2. To weigh the cargo items to be packed into the container, including the mass of pallets, dunnage and other securing material. Adding that weight to the tare weight of the container itself as indicated on the CSC plate, using a certified method approved by the competent authority of the State in which packing of the container was completed.
- The VGM must be stated in the shipping document and must be signed by a person duly authorized by the shipper (this can all be done electronically)
- The shipper must provide the shipping document with a VGM to the master (or his representative) and the terminal, sufficiently in advance, as required by the master, to be used in preparation of the ship's stowage plan.
- If the shipping document does not provide the VGM and the master and the terminal have not obtained the VGM of the packed container, it shall not be loaded on to the ship.

This link contains [Gard's full commentary](#) on the new requirements, including how they may work in practice, and the implications for P&I cover and claims handling.

Where to find more information/guidance

The MCA has issued a useful Marine Guidance Note and several industry organisations have also issued guidelines. A coalition of industry experts has compiled a list of frequently asked questions (FAQs) and their answers. All these are accessible via the [IMO website](#) .

Conclusion

The new VGM requirements are clear. Implementation and enforcement is less so, therefore it will be important for all stakeholders involved in container logistics to engage with each other about obtaining, providing, transmitting and receiving the VGM.

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