

FAQs for Implementation of SOLAS VGM

Q1. Under SOLAS Convention, what is required from shipper when declaring verified gross mass of the packed containers?

A1. The International Convention for the Safety of Life at Sea (SOLAS) is an international maritime treaty. SOLAS amendments to the Convention (the new regulation on verified gross mass declaration of packed containers) provides: shipper on the bill of lading must be specified before shipment, provides packed containers Verified Gross Mass (VGM), and is responsible for ensuring sufficient time in advance to the master or his representative and terminal representative in the preparation of loading plan . Packed containers without VGM shall not be loaded on board the vessel.

Q2. When is the effective date for the SOLAS amendments on Verified Gross Mass (VGM)?

A2. According to the International Maritime Organization (IMO) regulations, the implementation date for VGM will take effect on July 1, 2016.

Q3. Who will be responsible to provide VGM under the new SOLAS Convention regulations?

A3. Consignor (shipper or third party arrangements) displayed on the bill of lading will have to provide VGM of packed containers but the ultimate responsibility falls on the shippers.

Q4. When do we (Wan Hai) globally announce the implementation of VGM?

A4. Wan Hai made the first global VGM announcement to its customers on 6th April 2016.

Q5. When do we (Wan Hai) intend to implement the new SOLAS requirement on VGM for packed containers?

A5. To abide by the International Maritime Organization (IMO) requirement, Wan Hai will implement the VGM regulation globally with effective from 1st July 2016.

Q6. What are the provisions of the SOLAS Convention for the methods in obtaining VGM?

A6. Method 1- Upon completion of the container stuffing and sealing, the shipper may weigh the packed container personally or arrange a third party to carry out the weighing.

Method 2- consignor (shipper or third party arrangements) can weigh all the packages and goods, including the weight of the pallets, dunnages and other packaging and securing devices, the empty weight of the container and adding the weight of all the items to derive VGM.

Q7. When does shipper need to provide VGM?

A7. It is recommended that shipper provides VGM before container entering port/terminals or sufficiently in advance the designated cut-off time depends on local regulations.

Q8. Can VGM be declared separately or submitted together with other shipping information? Can amendments be made after declaration?

A8. VGM can be declared together with other shipping information, modified and amended before specified deadline. However, any charges, risk and liability arising thereof will have to be borne by the shipper.

Q9. Can shipper entrust a third-party to declared VGM?

A9. Yes. Shipper may declare themselves or entrust to a third-party. However, a proper written authorization from the shipper to the third-party will be required.

Q10. Is it permitted to load on board the vessel for a packed container without VGM ?

A10. No. All packed containers without VGM by cut-off time are required by SOLAS not to be loaded onboard the vessel.

Q11. What is the consequence of not complying with the SOLAS Convention?

A11. Please strictly abide by the provisions of the SOLAS Convention. Any packed container without VGM by specified deadline shall not be loaded onboard the vessel. Any cost incurred, risk and liability due to omission and late declaration of VGM have to be borne by the shipper.

Q12. Does SOLAS Convention provide any standard format for reporting VGM?

A12. Not at the moment. The SOLAS Convention only specified the methods in obtaining VGM and the requirement for Shipper or authorized third-party to sign the declaration.

Q13. What is the process of submitting the VGM?

A13. The process will be: < Shipper → Carrier → Terminal >.

Q14. What is Wan Hai VGM reporting format?

A14. Wan Hai accepts VGM declaration by the following ways:

- (1) Electronic Data Interchange (Standard EDI: VERMAS, IFTMIN, 304)
- (2) Wan Hai website
- (3) Paper submission including Container Loading Plan(CLP) when CY gate-in, CFS certificate of receipt and Stuffing Plan for consolidated cargoes.

VGM declaration should match the requirement imposed by local authorities with following minimum information:

- (1) Booking No. ;
- (2) Container No. ;
- (3) Verified Gross Mass (VGM) ;

- (4) Weight Scale (KGS/LBS) ;
- (5) VGM Verification Method (1/2) ;
- (6) Signature (Responsible Party) ;
- (7) VGM Contact Name and Email/Phone (Responsible Party) °

Q15. What if the actual VGM is different from the VGM being declared?

A15. The carrier has no obligation to check whether the VGM declared by shipper is correct or not. However if for some reason, it was discovered that the VGM being declared is different from the actual VGM, the carrier has the right to require shippers to re-submit the correct VGM or refuse to accept the container. Any cost, risk and liability incurred due to the wrong declaration will have to be borne by the shipper.

Q16. What if the VGM declared by Shipper is different from the total weight obtained from the weighing bridge of the terminal/port? Which should be used?

A16. The total weight obtained from the terminal/port should be used as VGM.

Q17. What is the acceptable error tolerance for VGM?

A17. According to the SOLAS Convention it is shipper's responsibility to correct and accurate VGM.

Q18. What is the difference between VGM and Gross Weight on the Bill of Lading? Do we need to show VGM on the Bill of Lading?

A18. Gross weight on the Bill of Lading refers to the total weight of the goods and mainly for commercial trading, custom clearance and making of Bill of Lading etc. VGM refers to verified total weight that includes container tare weight, cargo weight, packaging materials and primarily used for planning of ship stowage.

No. There is no requirement to show VGM on the Bill of Lading.

Q19. What is the difference between Gross Weight and Max. Gross Weight of a container?

A19. Gross Weight refers to the total weight of the goods and Max Gross Weight refers to the maximum total loadable weight (including cargo weight, packing material and container tare weight) of a container.

Q20. What if VGM exceeding the Maximum Gross Weight of the container?

A20. The container tare weight and maximum gross weight is being labeled on its right door when manufactured. Packed container with proper and correct VGM shall not be loaded if the VGM exceeds the maximum gross weight of the container.

Q21. Does Wan Hai provide weighing service for packed container(s)?

A21. Under SOLAS Convention, it is Shipper's responsibility to provide VGM. Therefore, shippers are recommended to obtain and provide VGM upon or before delivering packed container(s) for shipment.

Wan Hai does not provide weighing service at this moment.

Q22. Does Wan Hai provide EDI solution for VGM submission? Can Wan Hai provide the test environment for the customer to carry out testing?

A22. Yes. Wan Hai provides standard EDI in VERMAS, IFTMIN, 304 formats. It is recommended that shipper must liaise with local Wan Hai offices before carrying out the EDI testing.

Q23. What is the content of the circular (MSC.1/Circ.1548) issued by IMO/MSC dated 23/May/2016 on the approach when verifying compliance with the requirements of SOLAS regulations VI/2.4 to VI/2.6 ?

A23. The IMO Maritime Safety Committee circular dated 23/May/2016 agreed that administrations and Port State Control authorities should adopt a practical and pragmatic approach when verifying compliance with the requirements , for a period of

three months after 1 July 2016, with a view to:

- a. Permitting packed containers that are loaded on a ship before 1 July 2016 and are transhipped on or after 1 July 2016 to be shipped to their final port of discharge without the VGM specified in SOLAS regulations VI/2.4.to VI/2.6.
- b. Providing flexibility to all the stakeholders in containerized transport to refine, if necessary, procedures for documenting, communicating and sharing VGM information.

Q24. Where can we learn more about VGM?

A24. More information about VGM can be found in :

- (1) Guidelines regarding the verified gross mass of a container carrying cargo:
<http://www.worldshipping.org/industry-issues/safety/cargo-weight>
- (2) The IMO/ILO/UNECE Code of Practice for Packing of Cargo Transport Units (CTU) and CTU Code informative materials can be found at:
<http://www.worldshipping.org/industry-issues/safety/containers>
- (3) Status of national legislations:
<http://www.worldshipping.org/industry-issues/safety/global-container-weight-verification-rule-effective-july-1-2016>
- (4) IMO/MSC.1/Circ.1548
<http://www.imo.org/en/MediaCentre/PressBriefings/Pages/14-VGM.aspx>
- (5) WHL's global announcement on website for VGM (Chinese)
http://www.wanhai.com.tw/views/content/ContentPage.xhtml?q_content_id=81363&file_num=70079
- (6) WHL's global announcement on website for VGM (English)
http://www.wanhai.com/views/content/ContentPage.xhtml?q_content_id=81362&file_num=70339