AAPA Webinar on IMO Container Weight Verification Requirement

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There are three kinds of people in this world:

- Those who make things happen
- Those who watch things happen
- Those who ask “what happened?”

Right now a lot of shippers and receivers appear to be in category number three!

Our goal today is to at least begin moving toward category number one.
Lars has reminded us that shippers have been required by the SOLAS Convention to provide the gross mass of packed containers to their carriers.

Gross mass (weight data) was recorded on the cargo manifest along with other shipping instructions.

Container weight data is used to prepare the stowage plan for a departing containership.

IMO was asked to address misdeclared container weights.
SO WHAT SHOULD SHIPPERS AND RECEIVERS DO NOW?

- First: shippers need to understand the requirements. Beginning July 1, shippers must give their carrier(s) a “verified gross mass” (VGM) before that packed container can be loaded aboard a vessel.

- Second: shippers need to understand the two permissible methods for obtaining a VGM.

- Third: receivers need to work backward through their supply chains to ensure their sources understand what is required by SOLAS and their home government.
SHIPPER ACTIONS TO TAKE NOW

- Shippers should contact the EDI service they use to transmit B/L data to their carriers and terminal operators, as well as their carrier(s) to determine data formatting requirements, data transmission cutoffs, etc. Be proactive!
- While the United States Coast Guard is the enforcement agency for the United States, shippers should NOT expect any detailed guidance or regulatory action from the USCG.
- Exporters using intermediaries (freight forwarders, etc.) should contact them to determine that they know the requirements and are taking appropriate actions to be in full compliance.
- Shippers should NOT be watching, waiting and wondering.
THE TWO METHODS

- Method One: weigh the packed container, capture the weight data and “sign”
- Method Two: weigh the individual packages/drums/pallets, plus any bracing/blocking/dunnage, and add the tare weight of the container to the sum; capture that data and “sign”.

Question: how do I verify the scales??
In the U.S. the states regulate and test scales and other measuring devices (e.g. fuel pumps).

Question: is there an acceptable margin of error?
Not explicitly. Using weighing equipment that meets your state’s requirements will satisfy this requirement.
Question: what if my product gains or loses weight from moisture absorption or evaporation? What if the actual tare weight of the container differs from the stenciled tare weight?

In general shippers that use certified weighing equipment should not encounter problems with minor variations. It is hoped that the USCG guidance will underscore this understanding.

USCG will be looking for significant aberrations: a container of Italian marble showing a VGM of 5 tons!
ACTIONS FOR RECEIVERS

- VGM data is required to put a container on a ship, not to take it off!
- Contact your suppliers wherever they are located to determine if they are going to be in compliance on July 1. Remember that carriers are standing shoulder to shoulder: no VGM, no loading.
ENFORCEMENT

In the USA, the Coast Guard will be the enforcing agency; in other exporting nations, maritime safety agencies or other governmental entities are likely to be given these responsibilities.

To date, here is what Coast Guard has provided:
WHO PAYS?

Some shippers may be able to negotiate or leverage this cost, but any third party performing a weighing function will likely demand payment for services.
INFORMATION SOURCES

Download the “Verified Gross Mass Industry FAQs” from the WSC and GSF websites:

www.worldshipping.org
www.globalshippersforum.com

Check this Coast Guard website frequently:

http://mariners.coastguard.dodlive.mil/category/uncategorized/

Download the “Code of Practice for Packing Cargo Transport Units”:

www.unece.org/trans/wp24/guidelinespackingctus/intro.html
THANK YOU

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