



IMO SOLAS VI REGULATION 2 AMENDMENT:

SHIPPERS' QUICK REFERENCE GUIDE

Guidelines for packhouse managers, fruit shippers (exporters), logistics and IT service providers, shipping lines and interested stakeholders. Please use for reference purposes only.

THE VGM (VERIFIED GROSS MASS) PROCESS FOR PACKED CONTAINERS:

1. Ensure all weighing equipment used for determining the VGM, is certified.

The IMO Guidelines (MSC.1/Circ. 1475 of 9th June 2014) section 7 on equipment - should meet the standards and requirements of the State (i.e. the Legal Metrology Act, 2014) in which the equipment is used.

- **All weighing equipment** used for either Method 1 or Method 2 must have a Verification Certificate endorsed with a **Type Approval Number. (NRCS Legal Metrology - Type Approval)**
- Verification Laboratories as suppliers or manufacturers of weighing equipment, must be accredited by **SANAS (SANS 10378)** to verify weighing equipment. Equipment must be verified periodically. Non-automatic weighing instruments, every 24 months.

2. Choose applicable method of weighing to obtain the Verified Gross Mass.

- **Method 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 (**accreditation number** and/or certification by an agency appointed by SAMSA - **not required**).
- **Method 2:** 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 (**accreditation number** and/or certification by an agency appointed by SAMSA - **required**).

3. If a decision is made on using Method 2, contact an approved third party agent (appointed by SAMSA) and request an audit. On successful completion of the audit, the shipper (exporter or third party) should be issued with an accreditation number (adhere to point 4, 5 and 6 before the audit).

4. Ensure verified masses of pallets can be registered/recorded on IT operating systems preferably electronically or manually at the pack-house or container packing facility.

5. Have a system record available of the VGM (Verified Gross Mass) obtained for each packed container. (For audit purposes include record of cargo specifications (e.g. mass, number of packages) and calculation of the VGM).

6. Shippers to ensure a process is in place to pre-advise the VGM after completion of packing the container.

- NAVIS (terminal operating system) pre-advise: Shippers manually pre-advise directly on the NAVIS web portal or via EDI (electronically transmit pre-advise to NAVIS).
- Shipping Lines pre-advise: Shippers manually pre-advise on the shipping lines pre-advise web portal or via EDI and shipping lines will transmit the VGM pre-advise information to NAVIS.

7. Shippers must engage with shipping lines (discuss the VGM pre-advise transmission) to request access to NAVIS where applicable under proxy from the lines (or TPT).

- Third party pre-advise on behalf of shipper: Shippers' will require permission from shipping lines and TPT (Transnet Port Terminal) to gain access to NAVIS or lines pre-advise portals for their third party agent.

8. In case of dual loads, shippers' pre-advise of the VGM should be declared as Method 2.

9. Ensure the VGM do not exceed the Maximum Gross Weight (MGW) of the container indicated of the Safety Approval Plate, according to Section 14.2 of the SAMSA Marine Notice 18 of 2016.

10. On-deck containers (on deck of specialised reefer vessels) - VGM declaration submitted as part of the shipping instruction. (Consult with applicable lines).

11. TRANS-SHIPMENT CONTAINERS: 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; (for a period of 3 months).

12. If unable to implement the certified weighing measures under Method 2 (due to time constraints) shippers are encouraged to use Method 1 to legally comply 1 July 2016.

13. Familiarise yourself with the pre-advise process as soon as TPT have updated the NAVIS pre-advise portals with the VGM data fields. (Possibly from 27 June 2016).

14. A 2% enforcement tolerance will be implemented strictly for guidance purposes only.

NOTE: FOR CONTACT DETAILS AND ADDITIONAL INFORMATION, PLEASE REFER TO "ANNEXURE" AS SUPPLEMENTARY TO THE SHIPPERS QUICK REFERENCE GUIDE

Pre-Advice: Information of the container captured online, by a shipper or third party agent and sent to TPT indicating expected arrival of the container.

EDI: Electronic Data Interchange – transmission of container information from one computer system to another.

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ANNEXURE:

➤ **Contact Details for NRCS:**

1. Pretoria: Hennie Ferreira | hennie.ferreira@nrcs.org.za
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Database of approved weighing equipment:

<http://www.nrcs.org.za/content.asp?subID=70#1>

➤ **Contact details for SAMSA:**

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➤ **Official documents available:**

- IMO Guidelines Regarding the VGM of a Container Carrying Cargo (MSC.1/Circ.1475 – 09/06/2014),
- SAMSA Guidelines on the Implementation of SOLAS VI Regulation 2 Amendment: Verification of the Gross Mass of Packed Containers (SAMSA MN11 of 2015, SAMSA MN25 of 2015 and SAMSA MN18 of 2016),
- South African Legal Metrology Act, 2014 (Act 9 of 2014),
- South African Merchant Shipping (Carriage of Cargo) Regulations, 2004.
- Verified Gross Mass Industry FAQ's – December 2015
- SAMSA Marine Notice 25, 26 and 27 of 2016
- Fruit SA VGM Guidelines Part 1 and Part 2

➤ **Example of disclaimer for use by shippers (from Fruit SA VGM guideline Part 2 of 3: 27 May 2016):**

Shippers should also consider a form of disclaimer to be incorporated within the shipping instruction and/or the packing list against the VGM declared. Consider the following -

1. *The mass of fruit will alter over time due to moisture loss. There may well be a discrepancy with the VGM declared due to changes in the mass of the cargo, and*
2. *Shippers are required to include the tare mass of containers in the VGM submission. There may well be a discrepancy with the VGM declared due to a variance in the tare mass of the container being contrary to the tare mass as indicated on the container. Shippers have no means to determine the accuracy of the tare mass of the container.*

Furthermore, in the case where the VGM of a container has been detected to be misdeclared and deemed to be inaccurate, before accepting liability shippers must ensure that it can be determined if the cargo mass and/or the mass of the container has led to the VGM being erroneously misdeclared.