Isle of Man Ship Registry Technical Advisory Notice



SOLAS Amendments – Verified Gross Mass of Containers & Recommendations for Entering Enclosed Spaces

Ref. 005-16 Issued 02/03/16

The Ship Registry requests relevant parties note the following amendments to SOLAS which come into force on 1 July 2016.

Requirement for Verified Gross Mass of Shipping Containers (SOLAS VI/2.4-6)

The new regulation requiring verification of the gross mass of shipping containers has been implemented to address safety issues arising from the incorrect declaration of container weight. Incorrectly declared cargo weight has been known to be a contributing factor in a number of maritime accidents.

The new Regulations apply to all cargo carried in a container (as defined under the CSC), except for containers carried on a chassis or a trailer when such containers are driven on or off a ro-ro ship that is engaged in short international voyages, as defined in SOLAS regulation III/3 (i.e. not traveling more than 200nm from a safe haven and 600nm in total for a single voyage).

The Regulations place an obligation on the shipper to verify the gross weight of a container before delivering the container for loading onto a ship. This information should be communicated to the carrier in order to allow the verified weight to be considered in the stowage plan. The verified weight can be communicated to the carrier as part of the shipping instructions or by a separate communication. Regardless of the method used, a container should not be loaded onto the ship without the verified gross mass.

IMO guidance prescribes two acceptable methods of verifying the mass of a container:

- 1) By weighing the container upon conclusion of packing and sealing in which case the weighing equipment should be calibrated to the requirements of the State in which the equipment is being used.
- 2) By weighing all individual items to be packed in the container, plus the container itself, and calculating the total mass. It should be noted that the method for obtaining the verified gross mass in this way should be approved by the relevant authority of the State in which the packing of the container was completed.



The document declaring the verified gross mass must be signed by a person duly authorised by the shipper. Since this person is responsible for the accuracy of the verified weight, it is essential that they are identifiable from the shipping document by printing their name.

There is no prescribed deadline for submission of the verified gross mass to the carrier, other than that it must in sufficient time to allow the information to be included within the ship's stowage plan. Deadlines can therefore be negotiated between the carrier and shipper.

If a container is received for loading without a verified gross mass, then IMO guidelines permit the master and/or a terminal representative to weigh the container to obtain the verified gross mass on behalf of the shipper.

MSC.1/Circ.1475 provides full IMO guidelines for the process of verifying container weight.

Revised Regulations for Entering Enclosed Spaces (SOLAS XI-1/7)

The new regulation XI-1/7 requires that all SOLAS ships shall carry an appropriate portable atmosphere testing instrument or instruments. The instrument must be capable of measuring concentrations of oxygen, flammable gases or vapours, hydrogen sulphide and carbon monoxide and is to be used prior to entry into enclosed spaces.

MSC.1/Circ.1477 provides IMO guidelines to assist with the selection of portable atmosphere testing instruments for enclosed spaces. The key points from the guidelines are:

- Upon activation the instrument must perform a 'self test'.
- The instrument should clearly state which gas or vapour it is measuring.
- If the instrument is fitted with an alarm function, it should activate at the appropriate level, as determined by the Ship Registry.
- The minimum battery life of the instrument should be 10 hours.
- The instrument should generally be fit for purpose i.e. capable of being easily carried, readable in all light conditions, dust and waterproof and otherwise having due regard for the environment and temperatures in which it will be operating.

The instrument should also be provided with a manual that notes its features and alarms and explains how to operate, maintain and calibrate the instrument. Accordingly the regulation also requires that suitable means of calibration shall be provided.

The Ship Registry shall provide further guidance in the implementation of this new Regulation in due course. The Ship Registry would also wish to remind relevant parties of the full IMO guidance on Enclosed Space Entry procedures noted in Resolution A.1050(27).

Please note - The Isle of Man Ship Registry cannot give legal advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from vessel to vessel. You should consider seeking independent legal advice if you are unsure of your own legal position

