




SOLAS Container Weight Verification Requirements

GCCA Guidance for Industry

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1.0 Background

The International Maritime Organization (IMO) is a United Nations agency with responsibility for the safety and security of shipping. IMO has the authority to administer the International Convention for the Safety of Life at Sea (SOLAS), which has recently been amended to require that a packed container's gross weight must be verified before being loaded onto a ship. The revision was enacted in response to concerns about the safety of containers that may have inaccurate declared weights.

The new rules go into effect on July 1, 2016 and will impact GCCA members involved in the maritime shipping and transport of loaded containers. Once in effect, it will be a violation of SOLAS to load a packed container onto a vessel if the vessel operator and marine terminal operator do not have a verified container weight. 162 countries, including the United States, are parties to the convention and are subject to its requirements.

The SOLAS Amendment places the responsibility for providing a verified weight on the shipper. For purposes of the provision a shipper is defined as "a legal entity or person named on the bill of lading or sea waybill or equivalent multimodal transport document (e.g. "through" bill of lading) as shipper and/or who (or in whose name or on whose behalf) a contract of carriage has been concluded with a shipping company." Examples of shippers include the beneficial cargo owner, the non-vessel-operating common carrier and the entity that consolidates the cargo (master loader). The shipper must provide the weight information to the vessel-operating common carrier in advance of vessel loading.

2.0 Methods for Establishing a Verified Container Weight

2.1 Method One

Once a container has been packed and sealed (using calibrated and certified equipment), the shipper must either weigh the packed container or arrange for a third party to weigh the packed container. The scale, weighbridge, lifting equipment or other devices used to verify the gross mass of the container must meet the applicable accuracy standards and requirements of the country in which the equipment is being used.

2.1.1 On Ports/Terminals providing weighing services

Worldwide, more and more ports/container terminals are being added to the list of facilities that will accept and weigh full containers and provide the Shippers and Carriers with the VGM data.

2.1.1.1 USA/Canada/Mexico (Updated June 27, 2016)

OCEMA: The Ocean Carrier Equipment Association, representing the major shipping lines, is still in the process of establishing a collective agreement with ports on the East Coast to standardize VGM weighing and data transmission so shippers, truckers and other parties will not be faced with different requirements at each port.

Container lines support the use of current weighing process to meet SOLAS (6/20/16)

U.S. exporters have been seeking uniformity in the way that different terminals would handle the VGM applications. On June 20 the OCEMA (the association of the 19 largest container lines serving the U.S. trades), stated that it supports the use of existing ‘on-terminal’ scales to obtain the VGM data. Whereas the SOLAS regulation specifically calls for the shipper to be responsible for assuring that the VGM is submitted to the ocean carrier, the U.S. Coast Guard states that there are a variety of paths to comply with SOLAS, and it has become clear that a third party could submit the VGM on behalf of the exporter. The Coast Guard is the U.S. enforcement agency for the SOLAS regulation.


NVOs release SOLAS container pricing details (6/20/16)

Several non-vessel-operating common carriers have detailed how much they will charge shippers to transmit VGM declarations to marine terminals and container lines and what they will charge for weighing services. Clients can expect to pay between \$15 and \$25 for submittal of the VGM data on behalf of the Shippers. If the Shippers leave it up to the NVO to create the VGM data there will be various charges to be applied for FCL and LCL shipments respectively. It is recommended that Shippers consult with NCBFAA (National Customs Brokers and Forwarders Association) or directly with the service providers for the most accurate or timely update details of information.

Common approach for terminal weighing of VGM (6/22/16)

OCEMA, the ocean carriers’ association that coordinates their equipment, has been in the process of establishing a common approach for the U.S. terminals to weigh export containers on behalf of the Shippers. The organization’s objective is to create a universal approach for the terminals to accept containers that do not already have the VGM filed in advance by the Exporter. The terminal could weigh the container and transmit the VGM data to the ocean carrier and the Shipper in a way that complies with the Shipper’s responsibility. This effort by OCEMA is to attempt to avoid having different processes at the different ports. OCEMA cautioned that there may be operational constraints that require different processes for determining and transmitting VGM. OCEMA said it will continue to evaluate ways to achieve VGM compliance in cases where the terminal weighing approach is not feasible.

Potential disruptions: Leading container lines, container terminals and large volume shippers have prepared to implement the new rules, but there are widespread concerns over potential disruptions to the global supply chain. Also logistics companies and insurers are worried about keeping supply chains intact when the rule takes effect in less than three weeks.



One of the major ocean carriers urge their customer/shippers to take the following KEY steps:

- If at all possible, provide your VGM at the time of creating your shipping instructions.
- Submit your VGM electronically to avoid manual mistakes.

USA/Canada/Mexico: As of June 13, 2016 the following facilities are reported to be ready to provide VGM services from July 1st:

- Port Newark Terminal
- Baltimore Seagirt
- Port of Virginia
- Port of Charleston
- Port of Savannah
- Port Everglades
- Port of Miami
- Port of Jacksonville
 - The Jacksonville Port Authority has issued a statement that the private terminal operators at the port are ready to provide shippers with the container weight information. This is the same situation as reported by Port Everglades. Still to be determined are the details as to how the data will be transmitted to the shippers and to the ocean.
- FIT Port of Ft. Lauderdale
 - Florida International Terminal states that it is ready to offer its clients container weighing service in order to comply with the new SOLAS requirements. Existing certified truck scales will be applied with additional weighbridges to be added as demand warrants.
- Port of New York and New Jersey:
 - Port Newark Container Terminal: previously reported as accepting containers without VGM and has facilities for weighing and will do so at a charge of \$69.10 (charge statement dating back to May and may have been revised).
 - APM Terminals: The operator will accept containers without VGM information, but may reject some. Details subject to clarification.
 - Global Container Terminals: The operator will accept containers that do not have the VGM data. If, for some reason, the containers cannot be loaded onto a vessel, the shipper will face demurrage charges.


- Port of Seattle:
 - SSA Marine Terminal, Seattle: This operator will continue to weigh all export containers for safety requirements. The weight information will be provided to the ocean carrier and, presumably, in a coordinated action to the Shipper to be applied as the container's VGM data.
 - Northwest Seaport Alliance Terminals, Seattle & Tacoma: These operations will weigh all export containers for safety requirements but will not provide the weight readings to exporters in order that these can be applied to meet SOLAS rule.

In regards to the different scenarios above, there is presently a discussion as to the feasibility of using weight information generated to comply with safety rules to meet the VGM requirements. The U.S. Coast Guard has signaled that such an approach is acceptable. Terminals use large scales to weigh the truck, chassis and export container as a unit. The container weight for stowage purposes is determined by subtracting the weight of the truck, including fuel, and the chassis. With large volume of container movements in a terminal, weighing each container separately would drastically add to port congestion.

On the West Coast, the ports of Oakland, Los Angeles and Long Beach via their respective associations, have stated that they will continue to weigh all truck/export containers as they do now to comply with federal safety requirements, and they will provide this information to the shipping lines. It is up to the shipping lines if they will accept the weights used to meet existing OSHA rules as an official VGM declaration.

Canada: In general there is a lack of clarity of how the Canadian terminals will respond to IMO's rule. This is another example of the uncertainty facing shippers ahead of the July 1 deadline. The following information has been obtained as of June 13, 2016.

- Port Metro Vancouver and Port of Prince Rupert:
 - Operator DP World was one of the first international operator to announce that it would be installing new scales ahead of the rule's implementation at its British Columbia terminals and offer a weighing service to shippers. It plans to charge a \$245 fee per container (no further notices have been observed regarding the weighing charge).
 - The other operator in Port Metro Vancouver, the Canadian arm of GCT Global Container Terminals, has released a statement that it will neither load containers without VGM documentation on vessels come July 1, nor offer a container weighing service to the owners of the cargo in those boxes. The ocean carrier will advise of any containers for which VGMS have not been received, and those containers will not be loaded. Containers will be available for customers to remove, weigh and then return to the terminal.
- Port of Halifax:
 - Both the Ceres (Fairview Cove) and the Halterm (South End) terminals have stated that they will accept containers by truck, rail or short-sea with or without



VGM certification. These packed containers will not be loaded by the ocean carrier until proper VGM certification is obtained. Ceres has stated that their terminal will not offer weighing service to shippers. In case that a container arrives at the terminal without VGM documentation, the operator will stack the container on site and contact the shipper to obtain the VGM so that the container can be incorporated in the vessel stowage plan.

- Port of Montreal:
 - The port's two terminal operators have not yet provided notice of their plans how to handle the new container weight rule.
- Port Metro Vancouver and Port of Prince Rupert:
 - Operator DP World was one of the first international operator to announce that it would be installing new scales ahead of the rule's implementation at its British Columbia terminals and offer a weighing service to shippers. It plans to charge a \$245 fee per container (no further notices have been observed regarding the weighing charge).

Mexico:

- Port of Lazaro Cardenas
- Port of Manzanillo
- Port of Veracruz
- Port of Ensenada

The above listed terminals of Hutchison Port Holdings in these four ports will provide weighing services for export containers that arrive without VGM. It should be noted that the terminal must be given 48 hours advance notice by the Shippers. The cost for the services is still to be determined, but it has been assumed that the charge will be around US\$30 per container.

2.1.1.2 Global Overview of actions by ports and terminals (Updated June 27)

European Industry expecting disruption from SOLAS rule:

For a period of time disruption is to be expected in the terminals. For the major European terminals, the scale of weighing services will be impossible to predict. These large terminals cannot weigh containers on a large scale as this will disrupt the normal procedures. Long truck lines are expected as the supply chain catches up. Shippers that have not generated the VGM will need to find weighbridges, line up there, and wait. In BeNeLux area there is a charge of 39 Euro (US\$44) per container with an acceptable tolerance level between the VGM and the actual weight of 5 percent.

One European terminal's approach (6/23/16):


During a recent visit to a Swedish container terminal, it was learnt that they are, in general, ready for the July 1st deadline by having developed a weighing system on all of reach stackers that handle port inbound containers for exports; i.e. the reach stacker operator will register container weights on each container that is lifted from the train and likewise from each

truck-unloading operation. The concern is that, until the port will have a system in place to automatically transfer the VGM data, the reach stacker operator will have one additional task (actually outside of the normal procedures) and, however small a task, this will slow down operations. To compensate and adding the fact of having installed and calibrated systems to handle the weighing, there will be a charge for providing the VGM services.

Specific actions by ports and terminals worldwide:

- APM terminals state that they will weigh export containers at 31 of their terminals.
- PSA International (Singapore based worldwide terminal operator) states that they will provide weighing services to determine the VGM upon request in cases where the container arrives without the required data.
- Russia's Global Ports have been properly equipped to allow VGM data within the territory of the port and will be issued to cargo owners in electronic form. Other Russian terminals in the Baltic have similarly certification from the Russian Marine Registry of Shipping.
- UK Ports
 - UK's Port of Felixstowe, as reported earlier in the Cold Connection, has developed the solution of having weighing equipment installed on the reach stackers thereby registering the weight of the container at its arrival in the terminal before being stacked in the yard and prior to loading to the vessel. The system is approved by UK's Maritime & Coastguard Agency as being within its tolerance levels.
 - Port of Liverpool, Port of Greenock (Scotland) and Port of Dublin (Ireland), all part of the Peel Ports Group, have announced that they will help its customers comply with the new international regulation as of July 1. For example, Liverpool is installing dynamic axle weighbridges at the terminal truck gates linked with the port's terminal operating system that will automatically provide VGM data for the container. Shippers will be charged 19.50 pounds (equivalent to US\$27.50) for each container weighed at Liverpool and Greenock and 23 euros (equivalent to US\$26.00) at Dublin. Liverpool's preparation coincides with trials ahead of the opening of the new terminal – Liverpool 2 – in October. Peel Ports Group states that it has held extensive discussions over the weighbridges and processes with the Maritime & Coastguard Agency, the U.K. regulator responsible for the new rule.
 - London Gateway, owned by DP World, has installed weighing solutions on its automatic stacking cranes. The charge to the Shipper will be 17.50 pounds.
 - Port of Southampton's container terminal, also owned by DP World, has installed weighing solutions onboard its straddle carriers. The charge to the Shipper will be 17.50 pounds.
 - Port of Felixstowe (its services previously reported) will charge the Shipper 21 pounds for VGM generation.

- London Container Terminal, Tilbury and the Port of Grangemouth, Scotland (both part of Forth Ports) will offer weighing services.
- Denmark's Port of Fredericia has stated similar plans to that in Felixstowe. It is expected that other Danish container terminals will report on similar developments prior to the July 1st deadline.
- Interior Inter Modal Terminals: Germany's HHLA intermodal rail affiliate Metrans will offer VGM weighing services for SOLAS compliance for export containers at all its inland terminals. This is an example of how inland intermodal terminals can provide VGM data at an 'upstream' point of the transport chain and well in advance of the containers' arrival at the port export terminals.
- **EUROPE North Continent Ports:** The leading global container terminal operators — Singapore's PSA International, Hong Kong's Hutchison Port Holdings, the Maersk Group's APM Terminals and Dubai-based DP World — are the major operators of the container terminals in Europe's large ports. These companies will all be offering container weighing services at their terminals. This fact is easing exporters' fears of disruptions to their supply chains as of July 1st when SOLAS rules comes into effect worldwide.
- **BRAZIL:** Pricing of services for weighing of containers to provide VGM data: The subject of SOLAS requirements is very much on target in Brazil, but whether to charge a fee and if so, what the level of the charge should be, is presently the primary subject of discussion. Considering that weighing of containers for safety requirements are already covered in the terminal tariffs in Brazil, it has been suggested that an extra charges in the range of about \$10.00 to about \$20.00 per box would apply for enabling shippers compliance with the SOLAS rule. The subject discussion is ongoing, but it is expected that there will be a decision in place and agreed upon between the private and government sectors by July 1st.
 - **Rio de Janeiro:** Multi-Rio Container Terminal will charge shippers 57.57 reais (equivalent to US\$16.72) for container weighing services and VGM transmission. Multi-Rio has the scales and electronic data interchange systems in place to gather and transmit VGM information.
 - There is now clarity in Brazil that weighing options are in place at all the major container terminals, but there still seems to be confusion as to who will get charged by the container terminals for VGM generation and transmission. While Multi-Rio will charge shippers, other terminals in Brazil have floated the idea of charging container lines for VGM generation, particularly for large shipments of multiple containers. The issue has not yet been finalized.
- **HONG KONG & SHENZHEN:** Hutchison Port Holdings (HPHT): This company's ports are ready with the necessary equipment and processes to offer container weighing



services. The organization is actively engaging their customers to help them achieve a seamless transition. HPHT has worked with its shipping community and the regulator (Hong Kong Maritime Bureau) to come up with a practical approach to VGM compliance. HPHT has a total of 32 weighbridge facilities across its Hong Kong and Shenzhen container terminal operations.

- **SRI LANKA:** Sri Lanka's Ministry of Ports and Shipping has issued guidance on the implementation of the SOLAS VI Regulation 2 amendment that requires the verification of gross mass in packed containers (Container Weight Verification) with effect from July 1, 2016.
- **NO VGM services at ports:** For GCCA members working with ports not on this list and selecting Method #1, the Shipper will need to arrange for weighing of containers at their own or public weighbridges. Copy of the weight certificate must be supplied to the Shipper before preparing and signing the verified weight document which is then to be forwarded to the ocean carriers (and terminals) ahead of the arrival of the respective containers at the terminal gate.

2.2 Method Two

The shipper, or a third party arranged by the shipper, can 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 of the container's contents.


Note: Concerns have been raised about the accuracy of tare weights. In response, the Ocean Carrier Association has prepared a statement that shippers **will not be liable** for inaccuracy related to the tare weight obtained from the container external markings.

Weighing equipment must meet the applicable accuracy standards and requirements of the country in which the equipment is being used. The tare mass of the container must be visible on the exterior of the container. Estimation of weights is not permitted. In addition, the shipper cannot rely on the weights provided by someone else unless that weight is clearly and permanently marked on the surface of the goods.

Shippers choosing Method #2 must comply with certification and approval requirements established by the countries where the container is packed and sealed. It is important to note that IMO considers Method #2 as inappropriate for bulk cargo such as un-bagged grain or scrap metal that do not lend themselves to individual weighing.

3.0 Steps for Compliance

1. Shipper chooses method for establishing verified weight.
2. Shipper establishes a verified weight by method selected

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3. Verified weight is documented and included in shipping documents (electronic form is preferred). This can be part of the shipping instructions to the carrier or in a separate document that indicates the verified gross weight. The weight certification must be signed by someone authorized by the shipper.
 - a. Shipper may submit the verified weight to the shipping company. It is then the responsibility of the shipping company to provide information regarding the verified gross mass of the packed container to the terminal representative in advance of ship loading.
 - b. Shipper may submit the verified gross mass to the port terminal facility representative upon delivery of the container to the port facility in advance of loading.
 4. Carriers in receipt of a signed weight verification may rely on it to be accurate. However, if a carrier or terminal operator has reason to believe that the verified weight of the container provided by the shipper is significantly in error, they may take such steps as may be appropriate in the interest of safety to determine what the accurate weight is.

Note: Because the responsibility of providing a verified weight falls on the shipper, shippers may incur additional costs if more steps are taken to verify the container's weight.

5. It is ultimately the ship's master who has the discretion to decide whether a container is loaded. A ship's master may decline to load a container if they have concerns that it cannot be safely transported, regardless of the verified weight provided by the shipper.

3.1 For Shippers in the United States

The U.S. Coast Guard has jurisdiction for the enforcement of the SOLAS container weight requirement. The Coast Guard has determined that existing U.S. laws and regulations for providing verified container weights are equivalent to the requirements in SOLAS Regulation. This equivalency acknowledges the dynamic and flexible business relationship between the entities in the export chain, and it provides flexibility for these entities to reach arrangements in order to ensure compliance with the SOLAS amendments.

For the purposes of determining the VGM of a container, any equipment currently being used to comply with Federal or State laws, including the Intermodal Safe Container Transportation Act and the container weight requirements in 29 CFR 1918.85(b), are acceptable for the purpose of complying with SOLAS.

3.2 For European Shippers

An important one-day seminar was held in the Port of Antwerp on June 1st. The seminar was entitled 'One month to go – are you ready?' With the many nations and ports involved, the question of harmonization of the weighing processes was at the core of the discussions. Three main themes were covered; compliance, communication and contingency planning.

3.3 Discussion of liability for 3PL services providers

With the new rules in place, most likely the Cold Storage operators will be requested to provide the VGM data for containers at completion of stuffing. In most such cases the Cold Storage client will be the named Shipper on the Ocean B/L (Bill of Lading). The client's shipping manager or other authorized staff will sign the VGM based on the weight data received from the Operator.

There will be a clear understanding (an agreement) between the Operator and the Shipper as to the details of the procedures for which the Shipper authorizes the Operator to provide this data, including the tare weight as marked on the container. In the US, OCEMA, the association that represents the majority of the Ocean Carriers, has stated that the Shipper will not have a liability as to the correctness of the tare weight as taken from the container.

With above procedures in place, it does not seem that the Operator should be exposed to any extra liability for these operations compared to procedures that were applied prior to the implementation of the IMO rules as of July 1, 2016.

3.4 IMO recently added policy for a period of leniency in enforcement by relevant Government authorities

The new IMO policy urges an approach of 'practical and pragmatic' enforcement of the rules by country agencies for three months from July 1 onwards. This action by IMO was made due to the considerable confusion and lack of consistency of interpretation by the authorities around the world. In turn, this has caused conflicting positions surrounding the application of the VGM rule. As an example; freight forwarders state that the new policy is not helpful in their own specific enforcement approach towards customers that have received strict 'no VGM – no load' instructions.

IMO's intent seems to be that any party that has done its utmost to comply may receive special treatment, but those who have done little or nothing towards compliance can expect to be penalized. The ocean carrier's decision to load the container with a valid VGM certification has not changed, and all export containers will still need to be accompanied by a VGM that is submitted to the ocean carrier in time to plan vessel stowage.

4.0 Industry aimed at aiding shippers through SOLAS procedures

Different companies are working to develop software that will facilitate digital delivery of VGM data. Some of these companies are:

- INTTRA, N.J. based ocean shipping e-marketplace; seeks to make the digital delivery of the VGM of a container as simple and straightforward as possible.
- TRADE TECH, provider of transportation management and supply chain solutions; product name SYRINX e-Shipping Portal.

- KEWILL, Manchester UK and Chelmsford, Mass (US), a freight forwarder/maker of supply chain software has developed a computer-based product that works through INTTRA (see above).
- MOBILEWEIGHT ‘launches comprehensive shipping container solution to streamline global SOLAS VGM compliance’. Powered by INTTRA (see above) the proprietary mobile app delivers seamless and efficient electronic VGM filing with Ocean Carriers worldwide. Service through Apple and Google Android phones.

5.0 ‘Cut-off time’ for delivery at the container terminals

A key issue for industry is the lack of information regarding the ‘cut-off time’ for the delivery of the containers to the terminal with the weight information ready. It is to be expected that such information will be by special notice from the Ocean Carriers that will be provided in the container booking process.

Compared to past operations, it is expected that Shippers need to build extra time into their supply chains in order to submit the VGM details so that stowage planning can be made well in advance of the beginning of ship loading operations.

6.0 Recent relevant trade notices

6.1 Ocean Carriers and Freight Forwarders handling VGM on behalf of Clients:

a) Major freight forwarder Kuhne + Nagel details VGM submission costs to meet SOLAS rules (6/2/16): K+N has stated that it will charge its shipper clients \$25 if the VGM declaration is submitted via any means other than the forwarder’s online portal. The charge via the portal will be \$12.75 for each shipment. The extra cost above accounts for the K+N employees extra time to manually input the information.

b) DAMCO, the global logistics and freight forwarding group, has launched container weighing services at its 300 worldwide locations to help clients comply with a new international regulation. The Maersk Group subsidiary joins other leading global freight forwarders and terminal operators that have responded to shippers’ requests for help. Damco’s two services cover both the physical weighing process and a filing service, which includes the management of submitting a container’s VGM to the shipping lines. The services cover both full- and less-than-container-load shipments and are fully integrated in the company’s customer portal — [myDamco](#).

c) UPS has warned Shippers of SOLAS related delays once the requirements are effective on July 1. Lingering uncertainty and confusion industrywide is expected to contribute to the disorder, the carrier ‘cut-off times’ for the submission of the container weights will be the ultimate culprit.



7.0 Summary

There remains some confusion and uncertainty in the industry about the effects of implementing the new SOLAS requirements.

It is remarkable that out of the 162 nations that are signatories to IMO, as of June 10, 2016 only 23 countries had issued the mandatory guidance and regulations to its exporters, port terminals and to the international shipping companies.

As the new requirements go into effect, communication between shippers, carriers and terminals will be critical. GCCA members involved in the loading, shipping or transporting of marine containers are encouraged to review the new regulations and communicate with relevant shippers, carriers and terminals to develop a common strategy for meeting the requirements. Shippers and carriers should work together to establish timelines and processes by which the verified weight will be transmitted. Terminal operators and carriers should work together to establish processes for handling packed containers presented for loading that do not have a verified gross weight.

This guidance will be updated as new information becomes available.