

# THE JAPANESE SHIPOWNERS' ASSOCIATION

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4 October 2010, Tokyo

## **Competition Commission of Singapore**

5 Maxwell Road # 13-01  
Tower Block MND Complex  
Singapore 069110

Re: JSA COMMENTS ON CCS's PROPOSED RECOMMENDATIONS TO THE  
MINISTER WITH RESPECT TO LINER SHIPPING AGREEMENT

The Japanese Shipowners' Association (JSA) is grateful for the opportunity to submit comments to the Competition Commission of Singapore on its September 2010 Consultation Document.

The JSA is a nationwide shipowners' association consisting of 104 Japanese shipping companies. Many of our major member carriers are engaged in the liner transportation of cargo from/to or via Singapore throughout the world, including Japan.

Taking this opportunity, the JSA would like to express full support for the CCS's proposal to recommend that the Minister extend the block exemption for a further five years.

As stated in the Consultation Document, antitrust exemptions remain the regulatory norm for the liner industry in many virtually all major trading nations around the world. We recognise that liner shipping agreements continue to be essential for liner operators to maintain regular scheduled service and meet ongoing requirements for capital investment of billions of dollars for vessels and equipment. As a result of carriers' ability to participate in these agreements, the liner shipping business has been contributing to stable freight rates, enabling member shipping companies of

carrier agreements such as conferences, discussion agreements and consortia to save significant costs in providing reliable and economical liner shipping services and improve their service quality and level of efficiency to help develop a healthy, global economic environment.

An extended block exemption would continue to provide legal certainty to the shipping industry, and the JSA would therefore urge the CCS to recommend the extension of the block exemption to the Minister.

Respectfully submitted

The Japanese Shipowners' Association

By: \_\_\_\_\_

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