



Singapore Shipping Association

Ref: SSA/201/10/L

1 October 2010

Competition Commission of Singapore
MND Complex
5 Maxwell Road, Tower Block #13-01
Singapore 069110

Singapore Shipping Association Submission to Competition Commission of Singapore

The Singapore Shipping Association (SSA) would like to thank the Competition Commission of Singapore (CCS) for the timely publication of the Consultation Paper on CCS' proposed recommendations to the Minister of Trade & Industry with respect to liner shipping agreements.

SSA is pleased to note that the CCS Consultation Paper has taken into consideration SSA's suggestions.

SSA further welcomes CCS's proposal to recommend that the Competition (Block Exemption for Liner Shipping Agreements) Order 2006 (BEO) be extended for a further 5 years – the proposed extension of the BEO reinforces Singapore's strong commitment in maintaining Singapore's position as a leading hub port and a premier International Maritime Centre.

Furthermore, SSA is receptive of CCS' proposal to institute filing requirements for:

- Contact information for individual liners that are party to liner shipping agreements filed with CCS.
- Other jurisdictions in which a liner shipping agreement (and subsequent amendments) have been filed.

The Association would, however, like to clarify that:

- Filing of Agreements is conducted by individual agreement secretariat offices.
- Cost of filing is included under a fee paid by individual member lines to the agreement secretariat.
- In the event that liner secretariats are subject to excessively onerous filing requirements, there may be an increase in the fee charges payable by shipping lines.

Therefore, when filing reasons for variations or amendments to the text of the Agreement, SSA envisages that the additional requirement might include reasons for such administrative variations or amendments as the change/withdrawal of membership, change of member name and/or changes for the geographic scope of the Agreement.

In closing, the Singapore Shipping Association would like to take this opportunity to express its appreciation to CCS for the opportunity to participate in the consultation process during CCS' review of the merit of an extension of the Competition (Block Exemption for Liner Shipping Agreements) Order 2006 (BEO).

With best regards

Yours sincerely

A handwritten signature in black ink, appearing to be 'DANIEL TAN', written over a horizontal line.

DANIEL TAN
Executive Director