



## JAPANESE SHIPOWNERS' ASSOCIATION

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### **Submission of the Japanese Shipowners' Association Consultation on CCS's Proposed Recommendation to the Minister with respect to Liner Shipping Agreements**

The Japanese Shipowners' Association (JSA) is a nationwide maritime organisation comprising Japanese registered shipowners, charterers and operators of ships. As of 1 June 2015, the JSA is composed of 120 member companies.

On behalf of the Japanese shipping industry, the JSA is grateful for the opportunity to comment on the Consultation Document of the Competition Commission of Singapore (CCS) on its proposed recommendation to the Minister for Trade and Industry to renew the Competition (Block Exemption for Liner Shipping Agreements) Order (the BEO) under section 36 of the Competition Act.

The JSA fully supports the CCS's proposal to extend the BEO for liner shipping agreements in its current form for another five years until 31 December 2020. In this regard, the JSA wish to align with the comments to the CCS submitted by the International Chamber of Shipping (ICS) and the Asian Shipowners' Forum (ASF). As stated in submissions made by the ICS and the ASF, we firmly believe that liner shipping agreements, such as Vessel Sharing Agreements (VSAs) and Voluntary Discussion Agreements (VDAs), continue to be critically essential for carriers to maintain regular, high-quality and reliable liner shipping services, which are demanded by customers, in order to support the healthy development of global trade.

As discussed in Paragraph 18 of the Consultation Document, antitrust exemptions for liner shipping agreements generally remain the regulatory norm worldwide. Therefore, any major changes to the current maritime competition regime in Singapore could potentially be damaging for the global liner shipping industry, not just for those companies involved in trades to and from Singapore. We thus strongly welcome the CCS's proposal to extend the current BEO for another five years.

Respectfully submitted by  
The Japanese Shipowners' Association

Yoshikiyo Ono  
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