

---

24 March 2017, Tokyo

## **Representations On Case BE/0004**

### **Response to Supplementary Representation by Hong Kong Liner Shipping Association (R.16) Additional Comments by The Japanese Shipowners' Association (JSA)**

The Japanese Shipowners' Association (JSA) is a nationwide maritime organisation comprising Japanese registered shipowners, charterers and operators of ships. As of 1 February 2017, the JSA is composed of 123 member companies.

On behalf of the Japanese shipping industry, the JSA is grateful for the opportunity to comment on the supplementary representation by the Hong Kong Liner Shipping Association (HKLSA).

The JSA fully supports the practical proposal suggested by the HKLSA – the commission to adopt “the Revised VDA Scope,” which expressly eliminates any Hong Kong-specific pricing (including rates and surcharges) discussions and voluntary agreements within VDAs, but permitting the discussion and sharing of certain types of information among VDA members relating to the shipping industry, including supply and demand forecasts, vessel utilization and capacity levels, carrier costs, trade growth and development and international cargo flows (explained in much more detail in the HKLSA’s supplementary representation).

As we have expressed our opinion in the previous submission dated 13 December 2016, the JSA believes it will be very much important that there will be no disruption to its legislation among Hong Kong’s major trading countries if Hong Kong aims to maintain its competitiveness as a maritime centre and transshipment hub.

Not only the Revised VDA Scope would allow Hong Kong to remain generally aligned with other jurisdictions in terms of regulatory approach and network structure, it would also eliminate the elements of VDAs which the Commission most concerns about.

We thus strongly hope that the commission to take the HKLSA’s suggestion into a serious consideration and adopt the Revised VDA Scope approach instead of the original proposal.

Respectfully submitted by  
The Japanese Shipowners' Association



Yoshikiyo Ono  
Director General