

**Comments of the Japanese Shipowners' Association
on the CCS Consultation on Proposed Block Exemption Orders
for Liner Shipping Agreements**

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Summary of Major Points

The Japanese Shipowners' Association supports the Proposed Block Exemption Orders for Liner Shipping Agreements on 6 April 2006.

Statement of Interest

The Japanese Shipowners' Association (JSA) is a nation-wide shipowners' association comprising 104 Japanese shipping companies. As stated in our previous submission, since many of our major member carriers are engaged in the liner transportation of cargo between Singapore and many other parts of the world including Japan. We have accordingly taken keen interest in the developments of the proposed competition regime in Singapore.

The JSA appreciates the opportunity to present its comments on the CCS Consultation on Proposed Block Exemption Orders (BEO) for Liner Shipping Agreements on 6 April 2006.

Comments and Conclusion

The JSA shares the view of the CCS that the proposed BEO will put in place a regulatory environment broadly aligned with that currently in place for major jurisdictions including Japan, EU and the US and it will provide certainty to the shipping industry. In addition, the exemption would duly recognise the significant economic benefits for oceangoing commerce and trade that have historically been recognised as a result of ocean carrier agreements. We also support that the CCS's rationale for the BEO that the exemption system on carriers' agreements should provide sufficient flexibility for carriers to respond to international maritime developments without creating an unnecessary administrative burden.

The JSA would therefore support the proposed BEO and its rationale as a whole and urge the CCS to implement the BEO as scheduled.

Respectfully submitted

The Japanese Shipowners' Association

By: _____

Name: Mitsuo Nakamoto

Title: Director General

Date: 27 April 2006