

2019年7月24日

一般社団法人 日本船主協会

パナマ運河通航料改定案に対する意見書提出について

パナマ運河庁（ACP）は、6月14日付で、タンカー、ケミカルタンカー、LNG船、LPG船、自動車船、ドライバルカー（一部鉱石船およびバラスト航海）、客船の通航料を概ね5～15%値上げする一方、超大手コンテナ船社に対する優遇料金を若干拡大することを軸とする通航料金改定案（実施予定：2020年1月1日）を公表し、7月15日を期限として同案に関するパブリックコメントを求めておりました。

これを受け、当協会は7月12日付でACPに「別添」の意見書を提出するとともに、7月24日にパナマで開催される公聴会に中島副会長が参加いたしますので、お知らせ申し上げます。

また、国際海運会議所（International Chamber of Shipping：ICS）[注1]とアジア船主協会（Asian Shipowners' Association：ASA）[注2]、欧州共同体船主協会（European Community Shipowners' Association：ECSA）[注3]も、当協会意見書と同趣旨の共同意見書を7月15日付で提出しておりますので、併せてお知らせいたします。

【ご参考】当協会意見書の概要

- ・ 料金改定の事前通知については、当協会が最低限として要求を重ねてきた6ヶ月通知が実行されたことに対しては一定程度評価するが、輸送契約は年間契約が多い点を踏まえ引き続き12か月前通知に努めて頂きたい。
- ・ 料金改定の時期に関しては、2020年1月1日はIMOによるSOx規制強化と重なり、加えて貿易戦争や地政学的不安定性の高まりによって世界経済が不確実性を増す環境下での料金値上げは、荷動きに悪影響を及ぼしかねない。
- ・ ACPが極めて好調な業績を上げる一方、船社経営は厳しい状況にある。こうした中、ACPが通航料金を値上げし、剰余金積み増しを図る必要性につき十分な説明が尽くされていない。料金政策に関しては安定性と予見性が必須であり、通航料水準に関する長期計画が示されるべき。
- ・ 料金安定性に関しては、スエズ運河と比較しても短期に大幅な値上げ（船種によっては13年間で通航料が2倍超に）が繰り返されており、持続的な料金水準と改定間隔について十分な再考が必要。
- ・ 環境面からは、貨物当りの環境負荷低減が見込める船型大型化を促進する料金体系が志向されるべきにもかかわらず、今回の提案では新開門（=大型船）通航料金の値上げ幅が大きい。値上げを行うしても、大型船（新開門）とそれ以外（既存開門）の上げ幅は少なくとも同じとするべき。
- ・ コンテナ船・一般貨物船のタリフ据え置きは評価できるものの、大口割引拡大に関し、

公平な競争等の観点から、一部の超大手船社のみを対象とした優遇拡大ではなく、全てのコンテナ船が割引を享受できる制度とすべき。その他の船種については、5～15%の値上げとなるため、将来の荷動きへの影響が懸念される。

- ・上記を踏まえれば、最低6ヶ月（2020年6月迄）の施行延期を含む改定案の再考を要請する。

[注1] ICS : International Chamber of Shipping（国際海運会議所）

各国船主協会を会員として1921年に設立された組織で、本部をロンドンに置く。日本船主協会は1957年4月に加盟。2019年7月1日時点で35カ国・地域の36船協が加盟、世界商船船腹の80%以上を代表しているとされる。IMOやILO等の国際機関等において海運業界を代表する組織として活動している。

[注2] ASA : Asian Shipowners' Association（アジア船主協会）

アジア地域の船主間の相互信頼と協力関係の育成を目的として、1992年に当協会の提唱により設立。本部をシンガポールに置く。日本船主協会を含む8カ国・地域の船主協会で構成される。

[注3] ECSCA : European Community Shipowners' Association（欧州共同体船主協会）

欧州20カ国の船主協会で構成する船主協会。前身組織は1965年に設立。本部をブリュッセルに置く。欧州海運の利益向上を図り、海運企業が荷主と消費者利益のために自由競争市場において、欧州および国際通商に貢献することを目的とする。



JAPANESE SHIPOWNERS' ASSOCIATION

Kaiun Building, 2-6-4, Hirakawa-cho
Chiyoda-ku, Tokyo 102-8603, Japan
Tel : +81-3-3264-7180
Fax : +81-3-5226-9166
E-mail: int@jsanet.or.jp

12 July 2019, Tokyo

Mr Jorge L Quijano
Administrator/CEO
Panama Canal Authority of the Republic of Panama

Dear Administrator Quijano

The Japanese Shipowners' Association (JSA), which is a nationwide maritime organisation consisting of 126 Japanese shipping companies, hereby submits its comments with respect to the proposal to modify the Panama Canal Tolls System published by the Panama Canal Authority (ACP) on 14th June 2019.

Before commenting on the proposal this time, on behalf of the Japanese shipping industry, in the year to commemorate the ACP's 20th anniversary, the JSA greatly appreciates the ACP's various and long-standing efforts to support global trade. In particular, the JSA appreciates the regular dialogue between the ACP and JSA since November 2017, which enables us to frankly discuss broad issues concerning the policy and the operation of the Canal.

With regards to the respective proposal, first of all, the JSA values that the ACP this time has published it little more than six months before the intended implementation date, which may allow our members to consult with their customers on the new tolls system to a certain extent. Having said that, as the JSA has urged at our previous dialogue meetings, a six-month prior notice period is an absolute minimum and we would like to request a twelve-month prior notice period as shipping companies usually conclude one-year or longer-term contracts. For example, if a shipping company has just concluded a one-year contract with its customer in May 2019, it may be difficult to renegotiate the existing term and the shipping company might have to bear the cost (difference between the existing tolls and the new tolls) until the end of the existing contract.

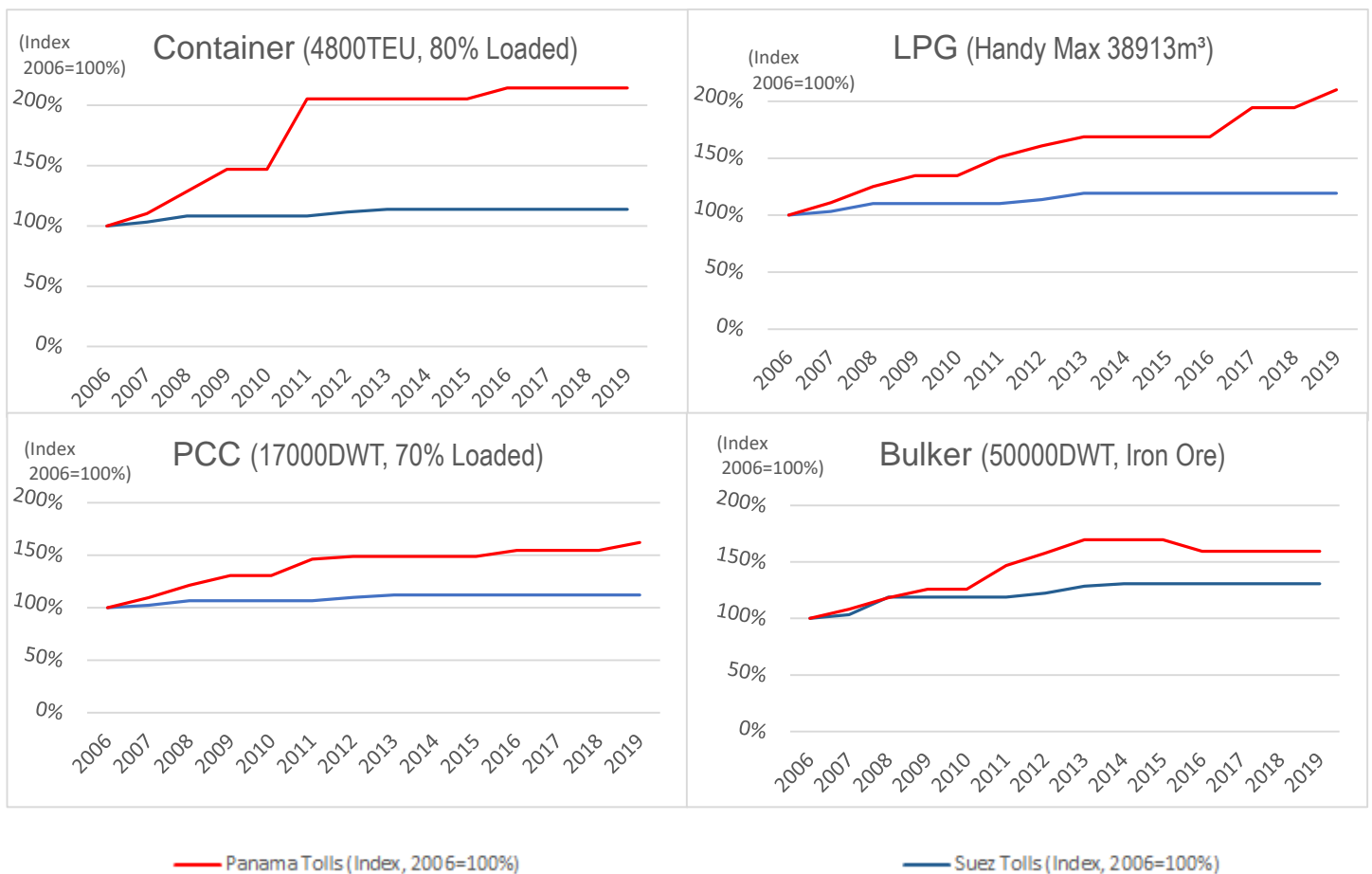
As for the timing of the tolls modification, as you may be aware, the International Maritime Organization (IMO) will implement the much tighter global SOx regulation on 1st January 2020, the exact same date as the proposed enforcement date of the ACP proposal. In order to comply with the new IMO regulation, the total cost is estimated to be approximately \$30 billion per year* and will be shared by the shipping industry, shipper industry and final customers around the globe. If the ACP were to implement the proposal

as scheduled in January 2020, it would be an additional burden on society on top of the unprecedented \$30 billion burden at the same time. We are concerned that such concurrent cost increases would have a very serious impact on world trade, especially when economic uncertainty is increasing due to a trade war between the world's biggest countries and the rising geopolitical instability.

**IMO MEPC 70/INF.34 Annex (Finland)*

In the meantime, we gratefully acknowledge that the ACP has achieved a new record in tonnage (442 Millions of PC/UMS Tons), revenue (\$3,108M) and profit (\$1,353M) in FY2018, because of the tireless efforts by the ACP, while the shipping industry is still in a difficult financial situation (e.g. the average final result of the three biggest Japanese lines was nearly a \$400m deficit in FY2018). Under such a situation, it is our regret that the ACP did not provide a clear and sufficient explanation for the users concerning the tolls revisions such as the necessity to accumulate additional reserves which enables future investment. We strongly believe that it is necessary for the ACP to present a long-term plan to the customers concerning the level of the tolls as long-term stability and foreseeability of the tolls pricing policy are indispensable for the Canal, a crucial key junction for efficient global trade and an indispensable public infrastructure for the world's economy.

As for the stability of the tolls, we would like to indicate that the tolls have been increased by 60-110% on average in 12 years, which represents a much steeper rate than for the Suez Canal, which has introduced many discount measures, up to 75% (dry bulk vessels and crude oil tankers in certain conditions).



While we, of course, deeply understand that financial sustainability is crucial for the ACP, Panama and the entire world which enjoys this indispensable public infrastructure for the world's economy, we would urge the ACP once again to seriously consider the sustainable levels of the tolls and the sustainable frequency of the toll revisions for the users.

From an environmental perspective, bigger ships are in general more environmentally friendly than smaller ones as they consume less fuel and exhaust less CO₂/SO_x/NO_x per cargo. In accordance with the ACP proposal this time, the percentage of the tolls increases for neopanamax vessels are, however, higher than panamax vessels, especially for PCC, dry bulker carrying iron ore, tanker, LPG vessels and cruise vessels. We believe that the ACP should promote the transit of bigger (neopanamax) vessels from an environmental perspective. For such sake, we believe that the increased rate for neopanamax vessels should be, at least, aligned with the one for panamax vessels.

With regard to the respective sectors, we are basically grateful to retain the current tolls for container vessels and general cargo vessels. However, as for container vessels, we are concerned that the introduction of the new Category 1a and Loyalty Plus may lead to too much of an incentive for the biggest lines, which have already been enjoying priority transit services based on the transit ranking system. As for other sectors such as dry bulk (iron ore), tankers, chemical tankers, LPG & LNG vessels, PCC & ROROs and cruise vessels, we understand that the tolls will be increased by 5-15%, which, we believe, may damage the future growth of the trade.

Considering the elements above, the JSA respectfully urge the ACP to reconsider the tolls modification this time including the postponement of the implementation for, at least, six months (i.e. until June 2020).

We would greatly appreciate your sincere consideration of our above comments.

Yours sincerely



Tadaaki Naito
President
The Japanese Shipowners' Association

CC: H.E. Rittter N. Diaz, Ambassador and Consul General of the Republic of Panama in Japan