

2013年2月28日

一般社団法人 日本船主協会  
(総務部)

## スエズ運河通航料金値上げに対する当協会意見書提出について

スエズ運河庁(SCA)は2012年3月の通航料値上げに続き、2013年5月1日付で通航料を値上げすることを2013年2月に突如発表しました。

当協会は、エジプト・アラブ共和国の厳しい財政状況を承知しつつも、SCAが運河利用者である海運業界との事前協議を一切行わず、通航料値上げを断行することに強く懸念するものです。スエズ運河はエジプト・アラブ共和国の国有財産であるとともに、地中海と紅海を結ぶ海上交通の要衝であり、世界経済の発展に不可欠な国際的な公共財であることから、通航料改定の過程には運河利用者との協議等を通じて透明性を確保する必要がありますと考えます。そのため、当協会はSCA長官宛に対して、以下主旨の意見書を2月27日付で提出しましたのでお知らせ致します(詳細につきましては添付(英文)をご参照願います)。

### <当協会意見書(概要)>

- 海運業界が非常に厳しい経済状況に直面している中、SCAが2012年の通航料値上げに続き、運河利用者との十分な協議を経ずして一方的に通航料値上げを行うことに深く失望している。
- 当協会会員会社は2011年に総額で4億ドル超のスエズ運河通航料を支払っており、2012年と2013年の値上げにより、2020年までの追加負担額は2011年の通航料支払実績ベースで約1億8900万ドルにも達する。
- 財政難に直面するエジプトには一刻も早い景気回復を切に願っているが、そのための追加負担を通航料値上げの形で運河利用者に安易に転嫁することを慎むべきである。
- SCAは通航料改定プロセスの中で3か月という非常に短い通知期間を確保するにとどまり、これでは海運会社の商慣行を考慮しているとは言えない。
- 上記を踏まえ、当協会はSCAに対し、今回の通航料値上げの撤回と現行の通航料改定プロセスの見直しを求める。
- SCAと海運業界が相互理解を深化させ、両者にとって最大限の利益が得られるような幅広いトピックを取り扱う定期的な意見交換の場の創設を提案する。当協会はこのような対話への積極的な関与を喜んで行うつもりである。

以上



## JAPANESE SHIPOWNERS' ASSOCIATION

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27 February 2013

Admiral Mohab Mameesh  
Chairman and Managing Director  
Suez Canal Authority  
Ismailia, Egypt

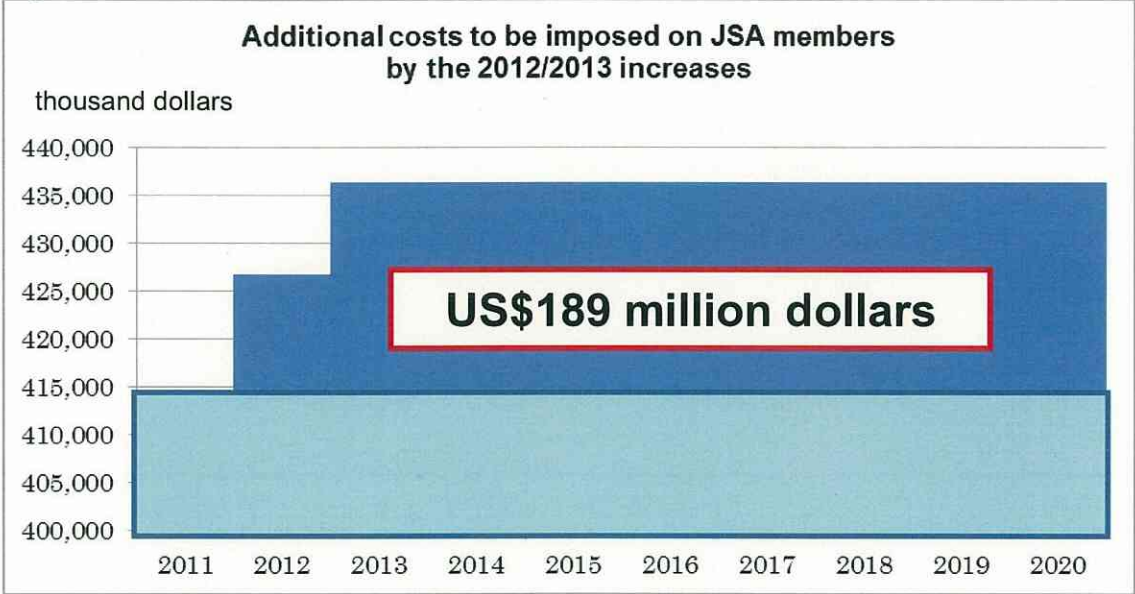
Dear Admiral Mameesh

The Japanese Shipowners' Association, which is a nationwide shipowners' association consisting of 100 Japanese shipping companies, hereby submits its comments, which are in line with the contents of the letter from the ICS on behalf of the Round Table of International Shipping Associations (ICS, BIMCO, INTERCARGO, INTERTANKO) dated 15 February 2015, in respect of your recent announcement of toll increases to be implemented from 1 May 2013.

As you are aware, the shipping industry has been experiencing greater difficulties than ever during the past few years partly due to softer demand in light of the slow recovery of the global economy. Under the circumstances, we are deeply disappointed at learning of the unilateral toll increase without sufficient dialogue between the Suez Canal Authority (SCA) and Canal users, following the 3% toll increase in 2012. In this context, I would like to emphasise on this occasion that the Canal toll fee is one of the major external elements that will impose a huge burden on the shipping industry, with the fact that toll fees of over US\$400 million were paid by JSA members alone in the fiscal year 2011. The impact of the 2012/2013 toll increases for members would amount to additional accumulative costs of approximately US\$189 million during the period from 2011 to 2020, based on the same ship types, sizes and number of transits during the period as per the data for our member companies in 2011 (See Figure 1). While sincerely hoping that the earliest possible economic recovery in your country could be achieved despite the ongoing

financial difficulties, the JSA believes that the SCA should avoid simply passing on this added burden to consumers in the form of toll increases in order to achieve that objective.

Figure 1



Source: Japanese Shipowners' Association

Furthermore, as stated in the ICS letter, we are very concerned with the current process in which a “very short three-month notice period” is given for Suez Canal toll adjustments for which we would have to say that the SCA is not taking the business practices of shipping companies into account.

In light of the above-mentioned point, we would like to urge the SCA to rescind the current planned increases as well as review the current toll-adjustment process, including notice periods of less than six months.

Furthermore, in order to deepen mutual understanding and also achieve maximum benefits to both SCA and the shipping industry, it is suggested to establish regular dialogue for interactive exchanges of views covering not only Canal tolls but also broad topics for enhancing both operational efficiency and safety, as well as environmental protection which, we are sure, would unquestionably enhance the value of the Canal and attract more ships from alternative routes. The JSA would be happy to actively engage in an exchange of information with the SCA. In this context, it is our great honour to

have a meeting with the Director of the Planning and Research Department of the SCA to be held at the JSA's offices on 1 March 2013, following the last meeting with the former director on 16 October 2012. A solid foundation of mutual understanding and exchanges formed through this kind of dialogue would be most welcomed.

We would appreciate it if you would give due consideration to our comments, and we look forward to hearing from you at your convenience.

Respectfully yours,



Akimitsu Ashida

President

The Japanese Shipowners' Association