

2015 年 2 月 12 日

一般社団法人 日本船主協会

パナマ運河新通航料体系・料金案に対する意見書提出について

パナマ運河庁（ACP）は、新開門の商業運用開始後に適用を予定している新通航料体系・料金の案を 2015 年 1 月 5 日付で発表し、2 月 9 日を締切に同案に関するパブリックコメントを求めています。

これを受け、当協会は 2 月 6 日付で ACP に **別添 1** の意見書を提出しました。また、国際海運会議所（International Chamber of Shipping : ICS）[注 1]とアジア船主フォーラム（Asian Shipowners' Forum : ASF）[注 2]もそれぞれ意見書を提出しましたので、お知らせいたします。

【ご参考】当協会意見書の概要

- ・昨年 8 月のパナマ運河開通 100 周年を改めて祝うとともに、ACP の長年に亘る安全、円滑、かつ効率的な運河通航環境確保を通じた世界貿易への貢献に謝意を表明。
- ・新通航料体系・料金案の取り纏めにあたり、ACP が海運業界との間で非公式対話を持ち、また、業界が同対話で示した意見が ACP 案にある程度反映されたことに謝辞。
- ・ICS 等、ACP との非公式対話に参画した国際海運団体から ACP に提出される意見書を支持。
- ・新体系・料金導入により、新開門開通の恩恵を被らない既存開門通航船の通航料が上昇する例が見られることから、その見直しを要請。
- ・コンテナ船対象の「loyalty programme」（予め一定の通航量を約束することで通航料金の値引きが得られる制度）が提案されたところ、将来的に他船種に対してもそれぞれの特性にあった同様の制度を検討するよう要請。
- ・タグボート利用料や綱取り料金等、新開門通航船の通航補助サービス料が公表されていないことから、料金レベルへの配慮と早期発表を要請。
- ・通航料政策における安定性・透明性・将来予見性の確保を要請。
- ・新タリフについてはできる限り長く維持するよう要請。

- ・ 通航料見直しを企図する場合は、実施希望日 1 年前の事前通告とユーザーとの事前協議の実施を要請。
- ・ 海運業界との定期的な対話スキームの早期制度化（ICS との間で定期対話のメカニズムを早期に合意し、2015 年中に実施すること）を要請。

※ICS 意見書 **別添 2** には、当協会意見書同様の内容の他、客船分野は新通航料体系・料金案によって新旧両開門通航船ともに大幅な通航料引き上げがもたらされるとして、その見直しを求める内容が含まれている。一方、ASF 意見書 **別添 3** については当協会意見書と同内容。

[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。2015 年 2 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] ASF : Asian Shipowners' Forum（アジア船主フォーラム）

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。日本船主協会を含む 8 カ国・地域の船主協会が構成される ASF は、世界商船船腹の約 50%を代表すると推定されている。



JAPANESE SHIPOWNERS' ASSOCIATION

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6 February 2015, Tokyo

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

Dear Administrator Quijano

The Japanese Shipowners' Association (JSA) is a nationwide maritime organisation comprising Japanese registered shipowners, charterers and operators of ships. As of 1 February 2015, the JSA is composed of 110 member companies.

On behalf of the Japanese shipping industry, the JSA warmly congratulates the Panama Canal Authority (ACP) on the centenary of the Panama Canal last August and greatly appreciates the ACP's various and long-standing efforts to support global trade through maintaining a safe, smooth and effective vessel transit environment.

With regard to the proposal for the new Canal toll structure/tariffs, firstly, the JSA especially appreciates your approach to listen to the shipping industry's voice on those through informal dialogue throughout most of the year of 2013, and we realise that to a certain extent, the shipping industry's opinion expressed at the informal dialogue was reflected in the ACP proposal published on 5 January 2015.

However, we would like to submit the following comments on the proposal and measures for establishing further a constructive and effective relationship between the ACP and the shipping industry:

1. Support for written opinions submitted by international shipping organisations

The JSA would like to express its full support for the written opinions submitted to the public consultation of the ACP by international shipping organisations such as the International Chamber of Shipping and those that got involved in the informal dialogue with the ACP.

2. Necessity of re-evaluating tariffs for ships not transiting the new locks

In the JSA's estimation, the toll for some types of vessels transiting the existing locks will be increased by the new toll structure/tariffs. We believe that there are no rationales for increasing the toll for ships which will not benefit from this Canal expansion project, and therefore some tariffs which will cause a toll increase for ships not transiting the new locks should be re-evaluated.

3. Recommendation for consideration of a loyalty programme for other sectors

The JSA appreciates the ACP's proposal on a "loyalty programme" for container vessels, which provides useful options for Canal users to obtain competitive toll rates. If this programme proves successful, we hope that the ACP will consider rolling out a parallel scheme for other sectors, in consultation with Canal users and considering the characteristics of each sector.

4. Concerns over variable additional costs (auxiliary costs)

The auxiliary service costs, such as the costs for using tug boats and the line handling service, are important cost factors for ships transiting the Panama Canal. However, we have yet to see the tariffs on those services for ships that will use the new locks. We would therefore be grateful if the ACP could decide the tariffs at a reasonable and competitive rate and inform Canal users of the tariffs as soon as the ACP has decided those, hopefully one year before the commencement date for operating the new locks so that Canal users can smoothly adapt to the new circumstances.

5. Indispensability of ensuring stability, transparency and foreseeability of the Canal's pricing policy

Needless to say, the Panama Canal is a crucial key junction for efficient global trade, and the JSA firmly believes this important national asset of Panama is also an indispensable public infrastructure for the world's economy. We sincerely ask you to further ensure the stability, transparency and foreseeability of the Canal's pricing policy once the new toll structure/tariffs have been adopted, in order to secure the stabilised growth of world trade.

6. Need for maintaining new tariffs as long as possible

In connection with the stability, transparency and foreseeability of the Canal's pricing policy, it is critically important for us that the new tariffs should be maintained as long as possible once those are introduced and the ACP is required to refrain from repeatedly increasing tariffs easily in the short term. In this regard, we would appreciate your kind understanding of the difficulties which have been put on Canal users by repeated toll rate increases in the past without a sufficient explanation of the rationale for those increases.

7. Prior notice/consultation periods for possible future toll increase

With regard to ensuring the stability, transparency and foreseeability of the Canal's pricing policy, we require a sufficient prior notice period and consultation period for any possible future toll increase. Therefore, we would like the ACP to make sure the appropriate processes are in place to apply in a certain time-frame in the event that the tolls have to be reviewed in the future.

For example:

1) Prior notice period:

12 months prior to the proposed implementation date of any toll increase.

2) The timing of a prior consultation between the ACP and the shipping industry (each sector):

from 6 to 9 months prior to the proposed implementation date of any toll increase.

* We believe that the rationale for the necessity of the toll increases should be explained at the consultation.

3) Official notice period:

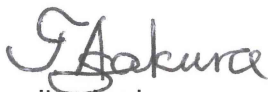
3 months prior to the implementation date of a toll increase.

8. Maintenance of regular dialogue between ACP and Canal users

The JSA thinks it would be beneficial for the ACP and Canal users to ensure the opportunity for regular face-to-face dialogue on various issues in order to not only establish a more constructive and healthy relationship with each other but also secure a stable Canal operation. The regular face-to-face dialogue should deal with not only the issue of Canal tolls but also the measures for enhancing operational efficiency and safety, in addition to the strategies to increase the Canal transit volume which will undoubtedly contribute to enhancing the long-term stable and future sustainable development of the Canal. We would therefore be grateful if the ACP could discuss and agree with ICS, which has played a central role in a series of informal dialogues on new toll structures/tariffs, on the regular dialogue mechanism as early as possible, in order to have the kick-off dialogue by the end of 2015.

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

Yours sincerely



Jiro Asakura

President

The Japanese Shipowners' Association

CC: Mr Ritter Díaz, Chargé d' Affairs, a.i. of the Embassy of Panama in Japan

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PROPOSAL TO MODIFY PANAMA CANAL TOLLS**PUBLIC CONSULTATION FEBRUARY 2015****INTERNATIONAL CHAMBER OF SHIPPING COMMENTS**

The International Chamber of Shipping (ICS) is the principal international trade association for the shipping industry, representing all sectors and trades including containership operators, tanker operators and dry bulk carriers, as well as specialised trades such as chemical carriers and car carriers. The membership of ICS comprises national shipowners' associations from 36 countries, and represents over 80% of the world's merchant shipping tonnage.

Reference is made to the proposal to modify the Panama Canal Tolls published by the Panama Canal Authority (ACP) on 5 January 2015. ICS greatly values the continuing open dialogue with the ACP on all matters related to the Panama Canal. In addition, the industry appreciates the efforts that the ACP has made to consult its customers informally over the two years leading up to the formal proposal for extensive and wide-ranging changes to the tolls system. In general, the shipping industry is reasonably satisfied with the draft proposal which is indicative of the extent to which the ACP has listened to the views of its customers. We encourage the ACP to continue with this promising level of customer engagement by establishing regular dialogue meetings with industry and ICS stands ready to discuss this in the near future. Concerning the present proposal, we are pleased to submit the following final comments for your consideration.

ICS is pleased that the industry's repeated calls for appropriate notice of intended changes to the structure of canal tolls has been heeded, and that the ACP has respected its public commitment to publish proposed changes to the

tolls structure at least one year before the date of commencement of operations of the new locks. This will give the shipping industry much needed time to adapt to the extensive changes. It is to be hoped that any future adjustment to tolls will also follow this commendable practice. In the interests of further promoting stability of world trade and predictability of costs for the shipping industry, it is suggested that tolls proposed should be implemented for a minimum term, before any changes are considered. In this case ICS believes that between 3 to 5 years would be a suitable period, allowing all sides to gather experience of using the new toll system, as well as the new locks.

The container and dry bulk sectors report that they are generally satisfied with the changes that have been made to the amount and structure of the charges that will be levied from 2016 onwards. In particular, the efforts made by the ACP to share the risk element in instances of low utilization transits and for those vessels transiting in ballast for repositioning are much appreciated. The effort to simplify the calculation schemes in general based on international scales such as, for example, the DWT is also very welcome. In addition, many comments from members have expressed approval for the loyalty scheme which has been announced for container vessels, which provides useful options for some customers to obtain competitive toll rates. If the scheme proves successful, we hope that the ACP will consider rolling out a parallel scheme for other sectors, though always in consultation with its customers and considering the characteristics of each sector.

Much less positive are the proposals for the passenger ship sector. While the ACP impact analysis notes that the passenger segment has shown a downward trend in Panama Canal transits during the period 2010-2014, which the sector believes is partly due to the already high rates, and partly due to lack of destination product development over the last decade, a 7% increase on the per berth toll has been proposed for those vessels continuing to use the panamax locks and 14% for those vessels using the new locks. These rate increases represent a significant additional cost per transit (an extra \$20,000 for some ships) and will have an impact not only for the Canal's cruise vessel transits, but for Panama's overall cruise tourism. While the ACP proposal states that the expansion project 'enhances the value of the route because the neopanamax locks are expected to draw heavy tourist attention' we respectfully suggest that the amount of new business may have been overestimated. In addition, ICS believes that if such drastic increases must be implemented, after all factors have been properly considered, then they should be staged. This would firstly allow the sector to properly adjust but secondly test the assumption that the new locks themselves will result in an increase in business for the passenger ship sector.

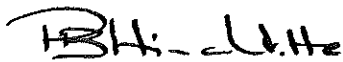
Some increases have also been proposed for some other sectors that will not benefit from the establishment of the new locks but will continue to use the current locks, and we cannot see the rationale for this as we believe it is in the

interests of the Canal for at least some customers to be encouraged to continue to use the existing locks.

Finally, some members have noted that the proposal does not mention variable additional costs, for example the use of tug boats, line handling etc. This creates some uncertainty in particular for operators of ships that will use the new locks at a time when margins are under pressure. We would therefore be grateful if the ACP could provide some indication of plans for the future costs for such services, bearing in mind our earlier point regarding the importance for shipowners and operators of appropriate notice of any additional cost.

We thank you in advance for your close attention to our above comments.

Sincerely

A handwritten signature in black ink, appearing to read 'P. Hinchliffe'.

Peter Hinchliffe
Secretary General, ICS



ASIAN SHIPOWNERS' FORUM

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9 February 2015, Singapore

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PROPOSAL TO MODIFY PANAMA CANAL TOLLS PUBLIC CONSULTATION FEBRUARY 2015 ASIAN SHIPOWNERS' FORUM COMMENTS

The Asian Shipowners' Forum (ASF) respectfully submits its comments in response to the proposal of the Panama Canal Authority (ACP) for the new Canal toll structure/tariffs. The ASF consists of the shipowners' associations of Australia, China, Chinese Taipei, Hong Kong, India, Japan, Korea and the Federation of ASEAN Shipowners' Associations comprising Indonesia, Malaysia, Myanmar, the Philippines, Singapore, Thailand and Vietnam. The role of the ASF is to promote the interests of the Asian shipping industry and to express its views.

Firstly, the ASF sincerely appreciates your approach to listen to the shipping industry's voice on the new toll structure/tariffs through informal dialogue throughout most of the year of 2013, and we recognise that to a certain extent, the shipping industry's opinion expressed at the informal dialogue was reflected in the ACP proposal published on 5 January 2015.

However, the ASF would like to submit the following comments on the proposal and measures for establishing further a constructive relationship between the ACP and the shipping industry:

1. The ASF would like to express its full support for the written opinions submitted to the public consultation of the ACP by international shipping organisations such as the International Chamber of Shipping and those that got involved in the informal dialogue with the ACP.
2. The ASF estimates that the toll for some types of vessels transiting the existing locks will be increased by the new toll structure/tariffs. We believe that there are no rationales for increasing the toll for ships which will not benefit from this Canal expansion project, and therefore some tariffs which will cause a toll increase for ships not transiting the new locks should be re-evaluated.
3. The ASF appreciates the ACP's proposal on a "loyalty programme" for container vessels, which provides useful options for Canal users to obtain competitive toll rates. If this proves

successful, we hope that the ACP will consider rolling out a parallel scheme for other sectors, in consultation with Canal users and considering the characteristics of each sector.

4. The auxiliary service costs, such as costs for using tug boats and the line handling service, are important cost factors for ships transiting the Panama Canal. However, we have yet to see the tariffs on those services for ships that will use the new locks. We would therefore be grateful if the ACP could decide the tariffs at a reasonable and competitive rate and inform Canal users of the tariffs as soon as the ACP has decided those, hopefully one year before the commencement date for operating the new locks so that Canal users can smoothly adapt to the new circumstances.
5. The Panama Canal is not only an important national asset but also an indispensable public infrastructure for the world's economy. The ASF sincerely asks you to further ensure the stability, transparency and foreseeability of the Canal's pricing policy once the new toll structure/tariffs have been adopted, in order to secure the stabilised growth of world trade.
6. In connection with paragraph 5, it is very important for us that the new tariffs should be maintained as long as possible once those are introduced and the ACP is required to refrain from repeatedly increasing tariffs easily in the short term. In this regard, we would appreciate your kind understanding of the difficulties which have been put on Canal users by repeated toll rate increases in the past without a sufficient explanation of the rationale for those increases.
7. With regard to ensuring the stability, transparency and foreseeability of the Canal's pricing policy, Canal users require a sufficient prior notice period and consultation period for any possible future toll increase. Therefore, the ASF would like the ACP to make sure that the appropriate processes are in place to apply in a certain time-frame in the event that the tolls have to be reviewed in the future.
8. As mentioned, the ASF sincerely appreciates your approach to listen to the shipping industry's voice on the new tolls through informal dialogue. The ASF believes that it would be beneficial for the ACP and Canal users to ensure opportunity for regular face-to-face dialogue on all matters related to the Panama Canal in order to not only establish a more constructive and healthy relationship with each other but also secure a stable Canal operation. We would therefore be grateful if the ACP could establish the regular dialogue mechanism with users as early as possible, in order to have the kick-off dialogue by the end of 2015.

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

Yours sincerely



Harry Shin
Secretary General
The Asian Shipowners' Forum