

2017 年 7 月 5 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、コンテナ船、コンテナ／ブレイクバルク船、LPG 船および LNG 船の通航料を 2017 年 10 月 1 日より改定する提案を 6 月 1 日付で発表し、7 月 3 日まで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 6 月 30 日付で ACP に **別添 1** の意見書を提出するとともに、7 月 5 日にパナマで開催される公聴会に参加いたします。

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] 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

- ・ 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。
- ・ コンテナ船およびコンテナ／ブレイクバルク船の通航料引き下げの提案は海運業界とアジア・北米の消費者にとって喜ばしく歓迎する。
- ・ LPG 船および LNG 船の通航料改定案については、短い通知期間での大幅な引き上げにより世界的なエネルギー事情にも悪影響を及ぼす可能性があることを懸念。
- ・ パナマ運河は新閘門が開通したことで、世界経済にとってますます重要なインフラとなった一方で、通航安全確保策の徹底等の改善が必要な部分もあり、通航料改定は時期尚早であると考え、見直しを要請。
- ・ 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。
- ・ 通航料見直しを企図する場合は、十分な事前通告、ユーザーとの事前協議の実施、また荷主を含む関係者への説明を要請。
- ・ 海運業界との定期的な対話スキームの早期制度化を要請。

※ICS 意見書 **別添 2**、および ASA 意見書 **別添 3** は概ね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] 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。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 ASA 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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30 June 2017, 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 124 Japanese shipping companies, hereby submits its comments with respect to the proposal to modify the Panama Canal Tolls published by the Panama Canal Authority (ACP) on 1 June 2017.

On behalf of the Japanese shipping industry, the JSA greatly appreciates the ACP's various and long-standing efforts to support global trade through maintaining a safe, smooth and effective vessel transit environment. In particular, the JSA appreciates the ACP's continuing customer-focused approach to Canal operations that has resulted in the proposal for "Containerships" and "Container/Breakbulk vessels", which would be beneficial for not only the shipping industry but also consumers in Asia / North America.

On the other hand, the JSA is extremely concerned about the proposed toll hike for "LPG and LNG vessels". The sharp increase on very short notice could have a bad effect on the global energy situation and could destabilise the Canal as a stable route. The Canal expansion has benefited its users and world trade and those vessels have launched the use of the Canal in a real sense, which is highly significant from the viewpoint of a stable energy supply in the world and add further weight to the Panama Canal as a public infrastructure for the world's economy. Meanwhile, new locks still have some areas for improvement such as safety transit, raising operational efficiency and so on. We do believe that the top priority is to improve those areas and establish the Canal as a stable route. It is premature to modify the current toll structure towards an increase. Therefore, the JSA strongly urges the ACP to reconsider the proposal for "LPG and LNG vessels".

Needless to say, the Panama Canal is a crucial key junction for efficient global trade, and the JSA firmly believes that this important national asset of Panama is also an indispensable public infrastructure for the world's economy. The JSA sincerely asks the ACP to further ensure the stability, transparency and foreseeability of the Canal's pricing policy in order to secure the stabilised growth of world trade. In this regard, we continuously require a sufficient prior notice period and consultation period for any

possible future toll increase. Any toll increase requires enough time to have an understanding among interested parties, and the ACP's explanation to all interested parties, including cargo owners, would be necessary.

The JSA believes that it would be beneficial for the ACP and Canal users to continue an open dialogue on various issues in order to secure a stable Canal operation. The 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. The JSA emphasises that securing a safe transit environment at appropriate toll levels is crucially important for both the ACP and Canal users.

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

Yours sincerely

A handwritten signature in black ink, consisting of several fluid, overlapping strokes that form a stylized representation of the name Koichi Muto.

Koichi Muto  
President  
The Japanese Shipowners' Association

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

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**Autoridad del Canal de Panamá  
PROPOSAL TO MODIFY THE PANAMA CANAL TOLLS SYSTEM AND THE  
RULES OF ADMEASUREMENT OF VESSELS FOR THE USE OF THE  
PANAMA CANAL**

Erasmó Méndez Icaza Street, Balboa – House #119  
Executive Vice Presidency for Planning and Business Development  
Strategic Relations Management Section (MERC)  
Balboa, Ancon, Republic of Panamá

**By Facsimile:** (507) 272-1416

**PROPOSAL TO MODIFY PANAMA CANAL TOLLS**

**PUBLIC CONSULTATION JUNE 2017**

**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 LNG/LPG, chemical carriers and car carriers. The membership of ICS comprises national shipowners' associations from 35 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 1 June 2017. ICS appreciates the continuing dialogue between the ACP and its customers and welcomes the opportunity afforded by the public consultation to engage on the proposed changes.

We offer the following comments:

As a general comment, ICS was disappointed to note that the proposed changes, if accepted by the Panama Canal Board, are due to be implemented on 1 October 2017, just three months after the end of the official consultation period on 3 July. At the last amendment, first announced in January 2015 and

implemented in April 2016, owners and operators had a full year to prepare for the impact of changes to tolls and this was very much appreciated. While it is noted that the changes in the current proposal do not affect all sectors and are not as extensive as those which followed the completion of the new locks, the ACP will recall the ICS has, at previous public consultations, repeatedly called for a minimum six month notice period for adjustments to tolls. Although the current proposals are advantageous for some of our members, they are disadvantageous for others and, for those members, a six month period before implementation is crucial to prevent negative impact on their businesses. In addition, while we understand that the 30 day official public consultation is a matter of Panamanian law, we have previously requested that where increases are contemplated, informal notice is given. We respectfully repeat this request in order to allow companies and sectors the time to undertake their own impact analysis and then to either to validate the impact analysis which is routinely done by the ACP itself, or to challenge it. We believe that the opportunity to properly consider the impact analysis will further contribute to the admirable openness and transparency of the toll adjustment process.

With regard to the detail of the proposals:

Our members in the containership and container/breakbulk sectors report that they are broadly satisfied with the proposals made and welcome their implementation.

In contrast, strong concern about the proposals has been raised by our members operating in the LNG/LPG sectors. The rise in tolls proposed is quite significant - 15% for LNG vessels and almost 30% in some cases for Neopanamax LPG vessels. We do not believe that the magnitude of these increases is justified. We also disagree with the assertion that the new toll proposal for the LPG and LNG segment will not significantly impact the competitiveness of trade in products transported through the Panama Canal. Indeed, our members in Asia have pointed out that the proposal may significantly affect energy prices in those countries and thus negatively affect their wider economy.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. Hinchliffe', with a stylized flourish at the end.

Peter Hinchliffe OBE  
Secretary General, ICS

**Asian  
Shipowners'  
Association**



30 June 2017

Panama Canal Authority de Panamá  
PROPOSAL TO MODIFY THE PANAMA CANAL TOLLS SYSTEM AND THE RULES  
OF ADMEASUREMENT OF VESSELS FOR THE USE OF THE PANAMA CANAL  
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**PROPOSAL TO MODIFY PANAMA CANAL TOLLS  
PUBLIC CONSULTATION JUNE 2017  
ASIAN SHIPOWNERS' ASSOCIATION COMMENTS**

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

Firstly, the ASA sincerely appreciates the continuing dialogue between the ACP and the shipping industry, and we recognize that to a certain extent, the extremely severe economic climate facing shipping was reflected in the proposal for "Containerships" and "Container/Breakbulk vessels". The ASA appreciates this approach to implementation.

However, the ASA is seriously concerned about the proposed toll hike for "LPG and LNG vessels". The substantial hike on very short notice could have a negative effect on the whole economy of Asian countries, as well as the energy situation in those countries, which could, in turn, negatively affect the Canal transit volume. The Panama Canal is not only an important national asset but also an indispensable public infrastructure for the world's economy. The ASA sincerely asks the ACP to further ensure the stability, transparency and foreseeability of the Canal's pricing policy in order to secure the stable growth of world trade. In this case, the ASA members require a sufficient prior notice period and consultation period for any possible

toll increase. Any toll increase requires enough time to have an understanding among interested parties, and the ACP's explanation to all interested parties, including cargo owners, would be necessary. We respectfully believe this did not occur in this case for LPG and LNG vessels and therefore strongly urges the ACP to reconsider the proposal for "LPG and LNG vessels".

The ASA firmly believes that it would be beneficial for the ACP and Canal users to continue an open dialogue on various issues in order to secure a stable and mutually beneficial Canal operation. We would like to discuss not only the issue of Canal tolls but also the measures for enhancing operational efficiency and safety transit and so on. The ASA emphasizes that securing a safe transit environment at appropriate toll levels is crucially important for both the ACP and Canal users.

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

Yours sincerely



Harry Shin  
Secretary General  
The Asian Shipowners' Association