

22 June 2026



Competition Commission
19/F, South Island Place,
8 Wong Chuk Hang Road,
Wong Chuk Hang, Hong Kong

As Interim Secretary General of the Asian Shipowners' Association (ASA), I am writing with regard to CASE BE/0004: Commission Proposal to Vary (Renew) the Competition (Block Exemption for Vessel Sharing Agreements) Order 2017 (as varied).

The ASA is a voluntary organisation of the shipowners' associations from ASEAN*, China, Cook Islands, Hong Kong, Japan and Korea, representing around 50% of the world merchant fleet. The ASA seeks to promote the interests of the Asian shipping industry and to contribute its perspectives on key issues affecting the sector, including the regulatory framework governing cooperative agreements in liner shipping worldwide.

**The Federation of ASEAN Shipowners' Associations (FASA) consists of associations from Brunei, Indonesia, Malaysia, Philippines, Singapore, Thailand and Vietnam.*

The ASA warmly welcomes the Hong Kong Competition Commission's proposal to renew the Competition (Block Exemption for Vessel Sharing Agreements) Order 2017 (as varied) for a further period of five years.

In the ASA's view, the proposed renewal would help ensure that Hong Kong's competition regime for liner shipping remains aligned with those of other major maritime jurisdictions, including Singapore, the United States and Mainland China. It would also provide continued legal certainty for carriers participating in vessel sharing agreements (VSAs) serving international liner trades to and from Hong Kong.

The ASA further believes that maintaining the existing block exemption framework will support Hong Kong's competitiveness as a leading international maritime and transshipment hub. In turn, this is expected to facilitate efficient and reliable liner shipping services, to the benefit of shippers, consumers and the broader economy, both in Hong Kong and internationally.

The ASA highly appreciates the careful study and analysis undertaken by the Commission in its review of this matter. We are also grateful that the Commission has given due consideration to the

views expressed by stakeholders across the shipping industry including the Hong Kong Liner Shipping Association.

The ASA hopes that the Commission will continue to adopt such a balanced and pragmatic approach in the future, thereby contributing to the maintenance and further enhancement of Hong Kong's position as one of the world's leading logistics and maritime centres.

We thank the Commission for the opportunity to provide these comments and respectfully express our support for the proposed renewal.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Eleanor Roi', with a long horizontal flourish extending to the right.

Eleanor Roi
Interim Secretary General
Asian Shipowners' Association