



香 港 領 港 會 有 限 公 司  
HONG KONG PILOTS ASSOCIATION LTD.

Your Ref: BE/0004.....

Our Ref: KWL037/2025

22 October 2025

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

Dear Sir,

**Case BE/0004: Commencement of Initial Consultation on the Second Review of the Competition (Block Exemption for Vessel Sharing Agreements) Order 2017 (as Varied)**

On behalf of Hong Kong Pilots Association Limited, we support the exemption of Vessel Sharing Agreements (VSAs) in Hong Kong because they allow shipping lines to collaborate on vessel space and schedules, which significantly improves operational efficiency and reduces redundant sailings.

This cooperation lowers shipping costs and fuel consumption, benefiting the environment and enhancing the competitiveness of Hong Kong's port.

Moreover, VSAs increase port throughput capacity, helping Hong Kong maintain its position as a leading international maritime hub amid growing global trade demands.

Granting exemption to VSAs aligns with global maritime industry's best practices and supports sustainable, cost-effective shipping services for the region. Indeed, our neighbouring ports including those in the Mainland are granting these exemptions, there is no reason for Hong Kong as the major shipping hub in East Asia not granting the exemption, or else no ship will be coming to Hong Kong and seriously damage the economy of the Hong Kong.

Yours faithfully,

Lee Koon Wah  
Chairman

cc : Hong Kong Liner Shipping Association