International Chamber of Shipping
Shaping the Future of Shipping

Walsingham House
35 Seething Lane
London
EC3N 4AH
Tel +44 20 7090 1460

info@ics-shipping.org | ics-shipping.org

10 July 2026

Competition Commission
19/F, South Island Place,
8 Wong Chuk Hang Road,
Wong Chuk Hang, Hong Kong
Attn: Representations on Case BE/0004

Case No. BE/0004

Submission on Commission Proposal to vary (renew) the Competition (Block Exemption for Vessel Sharing Agreements) Order 2017 (as varied)

The International Chamber of Shipping (ICS) is the principal global trade association for shipowners and operators, representing over 80% of the world merchant fleet across all sectors and trades, including container shipping lines. ICS membership comprises national shipowners' associations and other associations from 43 countries and territories, including the Hong Kong Shipowners Association and the China Shipowners' Association, as well as others in the Asia-Pacific region where the Hong Kong SAR plays a vital role as a regional and global maritime transport hub. Many ICS members are also members of the Asian Shipowners' Association (ASA) with whom ICS is fully aligned on competition law issues.

This submission is made in response to the Hong Kong Competition Commission (HKCC) public consultation on the HKCC's Notice of Proposed Variation, issued under section 20(2) of the Competition Ordinance, regarding the proposal to vary and renew the Competition Order 2017 (Block Exemption Order (BEO) for Vessel Sharing Agreements (VSA)) (as varied) for a period of five years.

ICS appreciates the opportunity to respond to the HKCC's Notice of Proposed Variation.

For the reasons explained in our submission dated 6 November 2025, ICS fully supports the proposal to renew the Block Exemption Order for Vessel Sharing Agreements for a further 5 years, on the same substantive terms.

As previously outlined in ICS's submission from 6 November 2025, we support the renewal of the VSA BEO for the following key reasons:

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- The VSA BEO plays a pivotal role in promoting healthy competition, and efficient and sustainable liner shipping operations.
- Considerable trade uncertainty remains due to global price inflation, new and increased trade tariffs, and issues relating to crucial international waterways. VSAs have greatly helped carriers respond to these unprecedented challenges, by mitigating uncertainties, enabling more efficient use of capacity, and helping carriers respond to trade disruptions to meet the needs of importers and exporters in the Hong Kong SAR and around the world.
- VSAs do not involve the joint setting of freight rates or customer allocation and, thus, do not present anticompetitive risks under normal scrutiny. They only involve operational co-operation, and they enhance competition, which is beneficial to the region's economy.
- In the context of the Hong Kong SAR, the liner shipping industry remains crucial to the Hong Kong SAR's economy and the Government's plans as a part the Chinese Greater Bay Area.

To conclude, ICS encourages the HKCC to continue to engage with international regulatory bodies as well as key trading partners and competitors for port services in Asia, to maintain regional and global consistency and efficiency.

ICS sincerely thanks the HKCC for their renewal proposal and opportunity to contribute to the consultation, and we once again fully support the proposal to extend the VSA BEO for a further five years. This BEO is an essential tool to ensure more competitive and safe supply chain operations.

ICS remains committed to supporting the Hong Kong SAR's current position as a regional maritime leader and key shipping hub, with aspirations for even more growth, and remains ready to engage and support on further matters in the future.

Yours sincerely,

Thomas A. Kazakos

Secretary General