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Competition and Consumer Policy
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Consolidated Supplementary Order Paper to the Commerce (Cartels and other matters) Amendment Bill

Many thanks for the opportunity to provide feedback on the Supplementary Order paper referred to above.

ExportNZ is pleased to see that the SOP provides a new block exemption in the Act to specified international liner shipping activities such as vessel sharing.

While we are fully supportive of more scrutiny and transparency being applied to rate setting amongst shipping lines, we were concerned that the previous version of the Bill went too far in including "route sharing" arrangements, as this could have constrained the ability of shipping lines being able to find the most cost effective way to move freight in a timely and dynamic way to the best advantage of exporters.

We believe that this SOP is a good compromise and it is sensible to take the same approach with the exemption as has been taken by the European Commission for Shipping Line Consortia¹ and the draft order issued by the Hong Kong Competition Commission.

It is important that the New Zealand policy in this regard is in step with international trends and that we are not making New Zealand a hard place to do business in, particularly given our size and geographic place in the world.

Yours sincerely

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