May 17, 2022

Panama Canal Authority of the Republic of Panama

Subject: Opinion on the proposal to modify the tolls system and the regulations

Japan LP Gas Association, including 5 major Japanese LPG importers and production companies, and SK Gas, Oriental Energy and Wanhua Petrochemical hereby jointly submit a written opinion on the proposal to modify the Panama Canal tolls system and the regulations published by the Panama Canal Authority (ACP) dated April 2022.

The participants of this joint statement are basically major importers of Japan, Korea and China. We bring around 20mil mt/year of LPG from the U.S. Gulf Coast to the Far East Asia, and this demand is equivalent to approximately annual 900 voyages of LPG Panama Canal passage.

First of all, we highly appreciate ACP's various efforts to support global shipping trade over the long term. We also value that the proposal, as well as the invitation for participating in the consultation process and public hearing, are informed well in advance. Reduction of the number of tariffs, introduction of fixed and capacity tariffs, review of ballast tariff and loyalty program, etc. are all duly acknowledged.

However, we have to say that the rise of toll fees by new tariffs is very embarrassing and hardly acceptable. There were several price increases of about 10 to 20% in the past, but this time, your proposal indicates the increase for all vessels' average by 30%, 40%, and 60% respectively within 3 years compared to the toll fee of 2022. Among them, in the case of LPG carriers, the toll fee shall be almost doubled as shown in the below table.

[Comparison of the current and proposed round-trip toll tariffs] unit:USD

	Laden Transit	Ballast Transit	Total Toll	Laden Transit	Ballast Transit	Total Toll	A to B
	2022	2022	<u>2022</u> A	<u>2025</u>	Toll 2025	2025 ···B	Increase %
LPG	286,791.72	229,009.10	515,800.82	526,649.50	473,984.55	1,000,634.05	194%

Without convincing and understandable background and reason, we regard ACP's proposal should be reviewed. Furthermore, the possible price hike by inflation factor in your proposal which would be a further burden on ships' side, is hard to accept.

Additionally, as mentioned before, we would like to seek your cooperation for improving transit booking period for LPG ships. It is hard for us to secure a proper transition slot to meet with FOB laycan in the U.S. and discharge laycan in Japan, Korea and China due to the booking period of only 2 weeks before ship's arrival at Panama Canal (Period 2).

This uncertainty makes us earlier arrival of the vessel at Panama Canal, and it would be worse in case heavy congestion at Panama Canal. It has been difficult for smooth LPG vessel programming between the US and Japan/ Korea / China. Therefore, we strongly request to change the current booking period (Period 2) into Period 1a (80 days).

For Japan, South Korea and China, LPG is an essential energy source not only for industrial purposes but for residential and commercial use, sustaining people's daily life. LPG imports from the US accounts very large share, therefore the smooth and stable passage of the Panama Canal is indispensable condition for us. We would highly appreciate it if you could understand our above requests and reconsider the proposal accordingly.

Yours sincerely,

Sakae Yoshida

Managing Director

Japan LP Gas Association

Kim Hyung Mok

Vice President of Trading Division

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パナマ運河庁パブリックヒアリング意見書 参考和訳

日付: 2022年5月17日

宛先: パナマ運河庁 (Panama Canal Authority: ACP)

表題: 料金システム変更と規定改定についての意見

日本の主要輸入生産会社 5 社からなる日本 LP ガス協会と SK Gas 社、Oriental Energy 社、Wanhua Petrochemical 社、の4者は ACPの 2022年4月付の料金システム変更と規定改定について共同で意見書を提出します。本共同文書の参加者は日本、韓国、中国の主要な輸入元であり、パナマ運河経由、年間約2,000万トン、おおよそ900航海/年に相当する米国 Gulf 湾産 LPG を極東アジアに輸入しています。

まず、これまでの長期に渡る ACP の世界的船舶貿易を維持するための努力に感謝します。この度の改定を十分事前に周知し、意見書提出とパブリックヒアリングを広く公募することを評価します。料金規定数の削減、同規定の固定・船舶容量連動化、バラスト航海時の規定やロイヤルプログラムの見直し等についてよく理解しました。

しかしながら、新たな料金値上げについては非常に当惑しており受入れ難いと言わざるを得ません。過去に 10~20%程度の値上げはあったものの、今回は全船種平均で 3 年間のうちにそれぞれ 2022 年と比し 30%、40%、60%と大幅な値上げです。その中でも LPG 船の場合は以下の通り約 2 倍近い大幅な値上げとなっています。

【往復航海通峡料金/現行と新提案比較】 単位:USD

	Laden Transit	Ballast Transit	Total Toll	Laden Transit	Ballast Transit	Total Toll	A to B
	2022	2022	<u>2022</u> A	<u>2025</u>	Toll <u>2025</u>	<u>2025</u> B	Increase %
LPG	286,791.72	229,009.10	515,800.82	526,649.50	473,984.55	1,000,634.05	194%

我々としては説得力があり理解のいく背景や理由が無ければ、今回の改訂は見直されるべきと考えます。 さらに、提案にあるインフレ率上昇は本船側のさらなる負担につながり受け入れ難いものであります。

加えて、これまでも伝えた通り、LPG 船の通峡予約タイミング改善に協力頂きたい。パナマ運河到着 2 週間前の予約(Period 2)では、米国 FOB 船積み及び日本、韓国、中国での荷揚げスケジュールに適切なスロットの確保が困難です。かような不確実性の下、本船を早めにパナマ運河に到着させねばならず、パナマ運河混雑の場合は状況がさらに悪化します。これまで、米国と日本、韓国、中国間でスムーズな航海プログラムを組むのは難しく、ゆえに我々は現在の通峡予約タイミング(Period 2)を Period 1a(80 日前)に変更するのを強く要請します。

日本、韓国、中国にとって LPG は産業向けだけでなく、商業・民生用として一般の人々にとって欠かせな

いエネルギー源です。米国からの LPG 輸入量は非常に多くを占め、パナマ運河のスムーズで安定した通峡は我々にとって必須の条件です。上記にある我々の要望に理解を示し、貴提案を再考頂きたく、宜しくお願い申し上げます。

日本 LP ガス協会 吉田専務理事

SK Gas 社 キム貿易副本部長

Oriental Energy 社 ルー,Keegan シッピング常務

Wanhua Petrochemical 社 リアン副部長

以上