

20th March 2002

Clerk to Bills Committee
On Import & Export (Electronic Transactions) Bill 2001
Attention: Ms. Becky YU

Via Fax # 2869 6794

Dear Ms. YU,

Import and Export (Electronic Transactions) Bill 2001

We, members of the Grand Alliance namely P&O Nedlloyd, Hapag-Lloyd, NYK Line and Orient Overseas Container Line Ltd., wish to express our views regarding the Import and Export (Electronic Transactions) Bill 2001.

Our views are as follows

1. We fully support the replacement of manual submission of manifest by electronic means, which will improve the work efficiency and quality of the data. However, as carriers, we would not be gaining any benefits from this change. It is the government who would be getting the benefits.
2. EMAN is a government's initiative to improve their internal work efficiency and data quality and is not a product in providing better service to the industry. As carriers we are simply demonstrating our co-operation by providing the information via a different means as demanded by the government. Being an information provider, there should not be any charge levied on us.
3. To our knowledge, governments of developed countries such as USA and major European countries do not impose a charge for data which they require from the carriers whether it be in hardcopy or electronically. Secondly it is normally accepted directly from the information owner instead of having to go through an intermediate party.
4. EMAN should not be looked upon as a profit-making undertaking.

Accordingly, it is the unanimous opinion of our Alliance members that there should not be any charge to the carriers and it should be the government's sole responsibility to cover all costs from whatever saving which can be realized.

Yours truly,

Alfred Lo, Managing Director – P&O Nedlloyd (HK) Ltd.
Ozaki Shuichi, Managing Director – NYK Line (HK) Ltd.
J. Henry Bennett, Managing Director – Hapag Lloyd (China) Ltd.
Bill Chang, Managing Director – OOCL (HK) Ltd.

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| c.c. | Mr. Jim Poon | HKLSA |
| | Mr. Roberto Giannetta | HKLSA |
| | Mr. Steen Lund | Maersk Sealand |
| | Ms. Miriam Lau | Legislative Councillor (Transport Constituency) |