



European Commission
DG Competition
Comments to IACS commitments

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**COMMENTS TO THE EUROPEAN COMMISSION'S MARKET TEST OF
COMMITMENTS PROPOSED BY IACS CONCERNING SHIP CLASSIFICATION
MARKET**

Reference is made to the Commission's press release dated 10 June 2009 on the captioned subject by which the Commission invites comments from interested parties on the commitments offered by IACS to meet concerns that it may have infringed Article 81 of the EC Treaty and Article 53 of the EEA Agreement, prohibiting restrictive business practices.

The members of the Nordic Association of Marine Insurers (Cefor) form one of the world's leading marine insurance markets. Cefor members are dedicated to safe shipping by doing their best to avoid covering substandard ships and promoting quality and transparency within the industry. In assessing risks and the quality of repairs, Cefor members rely strongly on the work of top standard classification societies. Dedicated to safe ships and clean seas, IACS makes a unique contribution to maritime safety and regulatory regimes through technical support, compliance verification and research and development.

The rules and standards set by the IACS members form one of the pillars of ship safety. Marine insurers experience from time to time that shipowners with ships classed by IACS members change to non IACS members in order to avoid costly requirements of maintaining a top standard class. From a marine insurance point of view, this clearly demonstrates the need for an association like IACS to promote the safety of life, property and the natural environment. Cefor will not welcome any measures that may result in the high standards of IACS membership not being upheld.

Cefor therefore fully supports the commitments that IACS has proposed to meet the concerns of the Commission and urges the Commission to adopt a commitment decision as described in the abovementioned press release.

Yours faithfully,
The Nordic Association of Marine Insurers (Cefor)

Helle Hammer
Managing Director