

# SINGAPORE

## TRADE SUMMARY

The U.S. trade surplus with Singapore was \$4.3 billion in 2004, an increase of \$2.9 billion from \$1.4 billion in 2003. U.S. goods exports in 2004 were \$19.6 billion, up 18.4 percent from the previous year. Corresponding U.S. imports from Singapore were \$15.3 billion, up 1.1 percent. Singapore is currently the 11<sup>th</sup> largest export market for U.S. goods.

U.S. exports of private commercial services (i.e., excluding military and government) to Singapore were \$6.9 billion in 2003 (latest data available), and U.S. imports were \$2.3 billion. Sales of services in Singapore by majority U.S.-owned affiliates were \$5.3 billion in 2002 (latest data available), while sales of services in the United States by majority Singapore-owned firms were \$1.4 billion.

The stock of U.S. foreign direct investment (FDI) in Singapore in 2003 was \$57.6 billion, up from \$52.4 billion in 2002. U.S. FDI in Singapore is concentrated largely in the manufacturing, wholesale, and information sectors.

The United States and Singapore signed a free trade agreement (FTA) on May 6, 2003, which entered into force on January 1, 2004.

## IMPORT POLICIES

### Tariffs

With the exception of four tariff lines covering beer and certain other alcoholic beverages, Singapore imposed no tariffs on imported goods prior to entry into force of the FTA. These four remaining tariffs have been eliminated under the United States-Singapore FTA. For social and/or environmental reasons, however, Singapore levies high excise taxes on distilled spirits and wine, tobacco products, motor vehicles (all of which are imported), and gasoline. During the Uruguay Round of multilateral trade negotiations, Singapore agreed to bind 70.5 percent of its tariff lines. The United States-Singapore FTA binds all Singapore tariffs at zero for imports from the United States meeting the FTA's rules of origin requirements. Singapore does not impose any restrictions or duties on imports or exports of textiles and apparel.

Singapore is a signatory to the WTO Information Technology Agreement (ITA). In addition to the United States-Singapore FTA and Singapore's FTAs with ASEAN, Australia, the European Free Trade Association, Japan, Jordan and New Zealand, Singapore is negotiating FTAs with Bahrain, Canada, Egypt, India, Mexico, Panama, Peru, South Korea, Sri Lanka, and a trilateral agreement with Chile and New Zealand. Singapore is also part of the ASEAN-China FTA.

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All imported goods (whether for domestic sale or re-export) are taxable under the Goods and Services Tax (GST), which is levied at five percent as of January 1, 2004, unless the goods are specifically given GST relief by the Director General of Customs. Goods kept in Free Trade Zones are not subject to GST, but are subject to GST if they later are imported into Singapore.

### **Import Licenses**

All imports require an import permit, although for most goods this is largely a statistical tracking requirement. Special import licenses are required for certain goods, including strategic items, hazardous chemicals, films and videos, arms and ammunition, as well as agricultural biotechnology products, food derived from agricultural biotechnology products, prescription drugs, over-the-counter drugs, vitamins with very high dosages of certain nutrients, and cosmetics/skin care products. Due to the United States-Singapore FTA, Singapore now allows the importation of chewing gum with therapeutic value for sale, subject to certain provisions.

### **STANDARDS, TESTING, LABELING AND CERTIFICATION**

Under the Consumer Protection (Safety Requirements) Regulations (2002), 45 categories of electrical products[?], electronics, and gas home appliances and accessories are listed as controlled goods and require a stamp of approval from the Government of Singapore's standards and certification authority (SPRING Singapore). SPRING Singapore recognizes test reports issued by accredited testing laboratories and national certification bodies. To date, SPRING Singapore has registered more than 22,000 models of controlled goods. SPRING Singapore has also developed standards for certain sanitary and building products. Labels are required on imported food, drugs, liquors, paints, and solvents. Repackaged foods must be labeled to show (in English) the appropriate designation of the food content printed in capital letters at least 1/16 inch high; whether the foods are compounded, mixed or blended; the minimum quantity stated in metric net weight or measure, the name and address of the manufacturer or seller; and the country of origin.

### **GOVERNMENT PROCUREMENT**

Government procurement is generally free and open. However, some U.S. firms have expressed concerns that government-owned and government-linked companies (GLCs) may receive preferential treatment in the government procurement process. Singapore's government denies that it gives any preferences to GLCs or that GLCs give preferences to other GLCs. Singapore has been a party to the WTO Government Procurement Agreement (GPA) since 1997. The United States-Singapore FTA provides additional government procurement access to U.S. firms by expanding the contracts that are subject to FTA disciplines.

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## **EXPORT SUBSIDIES**

Singapore's government does not directly subsidize exports, although it offers significant incentives to attract foreign investment, with most incentives directed at export-oriented industries. In addition to tax incentives and reimbursements to exporters for certain costs incurred in trade promotion, the government also offers grants to new service suppliers.

## **INTELLECTUAL PROPERTY RIGHTS (IPR) PROTECTION**

Intellectual property protection has improved since the late 1990s, leading to the removal of Singapore from the Special 301 Watch List in 2001. In line with its United States-Singapore FTA commitments, amendments to the Trademarks Act, the Patents Act, a new Plant Varieties Protection Act, and a new Manufacture of Optical Discs Act came into effect in July 2004. Amended Copyright and Broadcasting Acts came into effect in January 2005. After they are fully implemented, Singapore's new and amended IPR laws should help mitigate ongoing problems related to the availability of pirated optical disks, use of unlicensed software by businesses, the transshipment of pirated and counterfeit material through Singapore, and a burdensome process to get pirated material removed from Internet sites.

In accordance with its FTA commitments, Singapore is in the process of implementing Article 1 to Article 6 of the Joint Recommendation Concerning Provisions on the Protection of Well-Known Marks of 1999 and has signed and ratified the International Convention for the Protection of New Varieties of Plants (1991). After the amended Copyright Act comes into force, Singapore will initiate procedures to sign and ratify the Convention Relating to the Distribution of Program-Carrying Signals Transmitted by Satellite (1974), the WIPO Copyright Treaty (1996), and the WIPO Performances and Phonograms Treaty (1996). Singapore is a signatory to three other international IPR agreements: the Paris Convention, the Patent Cooperation Treaty, and the Budapest Treaty.

### **Parallel Imports**

Under the amended Patents Act, the patent owner will have a right to bring an action to stop an importer of "grey market goods" from importing the patent owner's patented product, if the product has not previously been sold or distributed in Singapore.

### **Enforcement**

Singapore's government contends that it is determined to improve IPR protection. Law enforcement efforts have contributed to a sharp reduction in the production of pirated material and blatant storefront retail piracy. According to the Singapore Police, the value of counterfeit and pirated goods seized in 2003 was \$19 million, more than three times that in 2002 (\$5.0 million). The Singapore Police, in a coordinated operation with the U.S. Federal Bureau of Investigation (FBI), broke up two Internet piracy syndicates, one with links to an international

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crime syndicate. Singapore's music piracy rate averages 10 percent to 24 percent, according to IFPI; for movies, the piracy rate is about 15 percent according to the Motion Picture Association. Despite tighter enforcement measures, pirated optical disks continue to be available from vendors in street markets, public housing estates, and at other high pedestrian-volume locations. The Intellectual Property Rights Branch (IPRB) of the Singapore Police is working to address such activities, but targeting highly mobile pirates is a challenge. Software piracy levels in Singapore, while among the lowest in the Asia-Pacific region, are almost double the estimated level in the United States; business software losses were estimated at nearly \$90 million in 2003.

Prior to the aforementioned changes in IP laws, Singapore's "self help" policy on IPR enforcement, which treated IPR infringement differently than other theft crimes, had placed an undue and expensive burden on rights holders to initiate raids and prosecute pirates. Under the FTA, Singapore has agreed to implement changes to the "self-help" policy, and committed to continue to assume principal responsibility for enforcement.

Over the past three years, a number of local educational institutions (the majority government-operated) have signed agreements to come into compliance with their legal obligations to pay royalty fees to publishers in exchange for the right to duplicate copyrighted printed works for use in course materials. Under the Singapore IP laws, the penalty for illegal photocopying is a fine of up to S\$100,000 or a jail term of up to five years, or both. These agreements appear to have helped in resolving a longstanding problem, at least among these educational institutions. Some commercial copy centers, however, continue to routinely take orders to copy entire textbooks. While some raids have been conducted, their effectiveness is limited.

### **Transshipment**

Although it is a major transshipment and transit point for sea and air cargo, Singapore does not collect information on the contents and destinations of most transshipment and transit trade, which account for 80 percent of the cargo coming through the port. This lack of information makes enforcement against transshipment or transit trade in infringing products extremely difficult. In addition, it is unclear whether Singapore law provides for the seizure of infringing products that are being transshipped or in transit. Pursuant to commitments under the FTA, Singapore passed legislation in November 2003 to provide for information-sharing with customs authorities of its FTA partners, including the United States.

### **Internet**

In accordance with the United States-Singapore FTA, Singapore amended its Copyright Act to provide improved protection for digital works, and outline requirements and procedures for removing infringing material from Internet sites.

## **SERVICES BARRIERS**

### **Basic Telecommunications**

On April 1, 2000, Singapore removed all barriers limiting foreign entry to the telecommunications sector. Any foreign or domestic company can provide facilities-based (fixed line or mobile) or services-based (local, international, and callback) telecommunications services. The former monopoly telecommunications service provider, Singapore Telecommunications (SingTel), which is 62.7 percent government-owned, faces competition in all market segments, including fixed-line, mobile, and paging services, although its main competitors, MobileOne and Starhub are also government-linked companies. However, there are concerns that SingTel charges other operators anticompetitive prices for the use of local leased circuits in the Singapore broadband business market. Under the United States-Singapore FTA, Singapore agreed to ensure that major suppliers of leased circuits services provide U.S. enterprises with leased circuit services at rates that are reasonable. The Infocomm Development Authority (IDA) in December 2003 issued a decision requiring Singtel to reduce its wholesale price for its local leased circuits. Following Singtel's appeal, the Ministry of Information, Communications and the Arts (MICA) in July 2004 upheld IDA's decision (with certain modifications). In October 2004, IDA accepted SingTel's amendments to its Reference Interconnection Offer (RIO) in line with MICA's decision. Concerns remain that Singtel's interconnection rates and requirements are anti-competitive .

Under the United States-Singapore FTA, Singapore also agreed that dominant licensees (e.g. SingTel) must offer cost-based access to submarine cable-landing stations and allow sharing of facilities. IDA issued a decision in September 2004 that telecommunications operators owning international capacity that connects to SingTel's submarine cable landing stations will have greater access to this capacity. IDA accepted SingTel's amendments to its RIO in October 2004.

In November 2004, IDA announced its preliminary decision to grant SingTel's proposal to exempt eight out of ten services that come under its Dominant Licensee obligations. This implied that SingTel would no longer be required to file tariffs on these particular services, and would have more flexibility in packaging and bundling them. IDA has invited public comments prior to issuing a final decision.

### **Audiovisual and Media Services**

The local free-to-air broadcasting, cable and newspaper sectors are effectively closed to foreign firms. Section 47 of the Broadcasting Act restricts foreign equity ownership of companies broadcasting to the Singapore domestic market to less than 49 percent, although the Act also gives the Media Development Authority (MDA), which replaced the Singapore Broadcasting Authority (SBA), authority to waive this requirement. The MDA, which came into operation on January 1, 2003, is a merger of the SBA, Films and Publications Department and the Singapore Film Commission. The government also imposes limits on individual equity stakes in

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broadcasting companies. Part X of the Broadcasting Act states that no person shall, without prior approval, hold more than five percent of the shares issued by a broadcasting company (the limit was three percent before mid-2002). In practice, all current local radio and television broadcasters are government-owned or government-linked. Between 2000 and September, 2004, Singapore Press Holdings (SPH) and MediaCorp each held newspaper and broadcasting licenses. Prior to 2000, SPH held the principal newspaper license and MediaCorp the only broadcasting license. In September, 2004, citing mounting losses in both companies, SPH and MediaCorp announced that they would merge their television operations under a new company, MediaCorp TV, 80 percent owned by MediaCorp and 20 percent by SPH. In approving the SPH/MediaCorp deal, MDA specified that MediaCorp TV had to outsource at least 285 hours of local content production to independent television production companies. Separately, SPH also absorbed MediaCorp's print media business. The exclusivity given to Singapore Cable Vision as the sole provider of pay television services since 1995 ended on June 30, 2002. However, there were no bidders for a second pay television operating license in a government tender held in mid-2003.

Singapore restricts the use of satellite receiving dishes and has not authorized direct-to-home satellite television services. Under Part VI of the Broadcasting Act, the installation and operation of certain apparatus on which broadcasting services are received, including satellite-receiving dishes, is prohibited except under license from the MDA. The government does not routinely issue licenses for television receive-only satellite receiving systems. Satellite broadcasters that want to operate their own uplink facility must get a special license from MDA. Satellite broadcasters who do not have their own facility are restricted to using one of four available uplink facilities.

The Newspaper and Printing Presses Act restricts equity ownership (local or foreign) to five percent per shareholder (raised from three percent before mid-2002), unless the government approves a larger shareholding, and requires that all the directors of a newspaper company be Singapore citizens. The Act defines "newspaper" broadly as "any publication containing news, intelligence, reports of occurrences, or any remarks, observations or comments...printed in any language and published for sale or free distribution." Newspaper companies must issue two classes of shares, ordinary and management, with the latter only available to citizens of Singapore or Singapore companies that have been approved by the government. Holders of management shares have an effective veto over board decisions.

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Any importer, producer, distributor, or exhibitor of newspaper (including newsletters, magazines, and periodicals) and audiovisual material, including every film or television program shown in Singapore, must be licensed by the MDA. Authority to issue permits for the distribution of publications is discretionary and subject to conditions; the government can deny or revoke permits without warning or without giving a reason. Some foreign news publications are "gazetted," *i.e.*, numerically limited by the government. The publications must carry printed approval notices or control stickers. Audiovisual content that is considered obscene, excessively violent, or capable of provoking racial or religious conflict is subject to censorship. Only organizations whose business is to exhibit films in cinemas or whose objective is to promote the appreciation of films are allowed to screen "Restricted (Artistic)" films. This category includes those films considered to have sexual, violent, religious, or racial themes.

### **Legal Services**

Foreign law firms with offices in Singapore face certain restrictions. They are unable to practice Singapore law, cannot employ Singapore lawyers to practice Singapore law, and cannot litigate in local courts. U.S. law firms can only provide legal services in relation to Singapore law through a Joint Law Venture (JLV) or Formal Law Alliance (FLA) with a Singapore law firm, subject to the Guidelines for Registration of Foreign Lawyers in Joint Law Ventures to Practice Singapore Law. These conditions have been relaxed for U.S. law firms, pursuant to commitments made by Singapore under the United States-Singapore FTA. As of November 1, 2003, there is only one U.S. JLV. From June 1, 2004, foreign lawyers are allowed to represent parties in arbitration in Singapore without the need for a Singapore attorney to be present.

With the exception of law degrees from certain Australian/New Zealand and British universities, no foreign university law degrees are recognized for the purpose of admission to practice law in Singapore. Under the United States -Singapore FTA, Singapore will recognize law degrees from four U.S. law schools.

### **Engineering and Architectural Services**

Engineering and architecture firms can be 100 percent foreign-owned. The requirement that the chairman and two-thirds of the firm's board of directors must comprise engineers, architects, or land surveyors registered with local professional bodies has been removed in line with the provisions of the United States-Singapore FTA. Professional engineering work in Singapore must be under the control and management of a director of the corporation who: (1) is a registered owner of at least one share of the corporation if it is an unlimited corporation; (2) is a registered professional engineer ordinarily resident in Singapore; and (3) has a valid practicing certificate. In the case of a partnership, only registered engineers may have a beneficial interest in the capital assets and profits of the firm, and the business of the partnership must be under the control and management of a registered professional engineer who ordinarily resides in Singapore. Similar requirements apply to architectural firms. Singapore limits the schools it recognizes as acceptable for qualifying to sit for the local architect exam; in the case of U.S.

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graduates, it accepts the Bachelor of Architecture degree accredited to the U.S. National Architectural Accrediting Board. Applicants must also have a minimum of between 12 months and two years practical experience in Singapore.

### **Accounting and Tax Services**

The major international accounting firms all operate in Singapore. Public accountants and at least one partner of a public accounting firm must reside in Singapore. Only public accountants who are members of the Institute of Certified Public Accountants of Singapore and registered with the Public Accountants Board of Singapore may practice public accountancy in the country. The Board recognizes U.S. accountants registered with the American Institute of Certified Public Accountants.

### **Banking and Securities**

#### **Retail Banking**

There are legal distinctions between offshore and domestic banking units, and the type of license held (full, wholesale or offshore).

Prior to 1999, the Monetary Authority of Singapore (MAS) had not issued new licenses for local retail banking for over two decades to either foreign or domestic institutions because it considered Singapore's banking sector to be saturated. In addition to barring any other foreign banks from entering the retail market, existing foreign banks in Singapore were not allowed to open new branches, freely relocate existing branches, or operate off-premise Automated Teller Machines (ATMs). However, foreign banks were permitted to install electronic terminals at their corporate clients' premises, and to provide home banking services through telephone and personal computers. Aside from retail banking, Singapore laws do not distinguish operationally between foreign and domestic banks.

In 1999, Singapore embarked on a five-year banking liberalization program to ease restrictions on foreign banks. Since then, the government has removed the 40 percent ceiling on foreign ownership of local banks and granted "qualifying full bank" (QFB) licenses to six foreign banks. A QFB license allows these banks to operate up to 15 customer service locations (branches or off-premise ATMs), up to ten of which can be branches; to relocate freely existing branches; and to share ATMs among themselves. They also can provide electronic funds transfer, point-of-sale debit services, accept Central Provident Fund (CPF) fixed deposits, and provide Supplementary Retirement Scheme and CPF Investment Scheme accounts. In December 2002, the government removed the 20 percent aggregate foreign shareholding limit on finance companies. Despite liberalization, foreign banks in the domestic retail banking sector still face significant restrictions and are not accorded national treatment. Aside from the limit on the number of foreign QFBs and their customer service locations, the foreign QFBs are not allowed to access the local ATM network. Local retail banks do not face similar constraints. Some foreign charge card issuers

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also face problems because they are prohibited from allowing their local card holders from accessing their accounts through the local ATM networks. Customers of foreign banks are also unable to access their accounts for cash withdrawals, transfers, or bill payments at ATMs operated by banks other than their own. In June 2004, the Singapore government announced further liberalization measures in the domestic retail banking sector. Effective January 1, 2005, QFBs are permitted to increase their service locations from 15 to a maximum of 25. They are also allowed to negotiate with local banks to let their credit card holders obtain cash advances through the local banks' ATM networks.

Acquisition of 5 percent, 12 percent, and 20 percent or more of the voting shares of a local bank requires approval from the Minister of Finance. Moreover, in spite of lifting the formal ceilings on foreign ownership of local banks and finance companies, officials have indicated that they will not allow a foreign takeover of a local bank or finance company. Officials say they want local banks' share of total resident deposits to remain above 50 percent. Foreign penetration of the banking system in Singapore is comparatively high, with foreign banks holding about 40 percent of non-bank deposits.

The United States-Singapore FTA removes most of these restrictions, improving U.S. market access in retail banking in Singapore. The current ban on new licenses for full service banks will be lifted no later than June 30, 2005, and by January 1, 2007 for "wholesale" banks. Licensed full-service U.S. banks will be able to offer all their services at up to 30 locations by January 1, 2006, and an unlimited number of locations within two years after January 1, 2006. Locally incorporated subsidiaries of U.S. banks can apply for access to local ATM networks after June 30, 2006; for non-locally-incorporated U.S. QFBs, this will commence January 1, 2008.

### **Restricted and Offshore Banking**

In 2001, the MAS announced plans to replace the current licensing regime that distinguishes between on-shore and offshore activities to one that distinguishes between retail and wholesale activities. The restricted and offshore licenses are progressively being replaced by a Wholesale Bank (WB) license, which allows wholesale banks to conduct a wider range of activities than restricted or offshore banks. All WBs will be allowed to accept Singapore dollar fixed deposits above S\$250,000, to offer Singapore dollar current accounts, and will not face any limits on the amount of Singapore dollar lending. Over time, the MAS will upgrade all Banks to WB status. The application process will also be open to new foreign bank entrants. License criteria include prudential considerations and the applicants' current scope of activities and future plans in Singapore.

### **Restrictions on Singapore Dollar Lending**

Non-residents can borrow local currency freely if the proceeds are used in Singapore. Non-resident financial entities may also borrow local currency freely for their activities outside

Singapore provided the proceeds are swapped or converted into foreign currency. There are no controls on the borrowing of Singapore dollars by residents.

### **Securities**

In 1999-2000, the government launched a number of initiatives aimed at liberalizing Singapore's capital markets. As of January 2002, all trading restrictions formerly placed on foreign-owned stockbrokers were removed. However, aggregate investment by foreigners may not exceed 70 percent of the paid-up capital of dealers that are members of the Singapore Exchange Limited (SGX). Legislation, which took effect in October 2002, allows for the direct registration of foreign funds, provided the prospectus is from an entity registered as a foreign company in Singapore and the fund is approved by the MAS. (Formerly, mutual funds and unit trusts had to be registered with the Registry of Companies and Businesses, under the Companies Act, before they could be marketed locally. In practice, this meant that foreign mutual funds had to be registered twice, once in the country of origin and again in Singapore.) The United States-Singapore FTA has relaxed certain conditions that foreign asset managers were required to meet in order to offer products under Singapore's Central Provident Fund (CPF) Investment Scheme.

### **Distribution Services**

Most multi-level marketing arrangements, particularly where participants receive financial compensation for the recruitment of additional participants, are prohibited in Singapore. The restrictions apply equally to both local and foreign arrangements. In January 2002, the Ministry of Trade and Industry implemented its Multi-Level Marketing and Pyramid Selling (Excluded Schemes and Arrangements) Order, to clarify which kinds of multi-level marketing arrangements are legal in Singapore. Any Singapore-registered company or citizen/resident is also prohibited from promoting any overseas pyramid selling marketed through the Internet. Insurance businesses licensed under the Insurance Act and its subsidiary legislations, master franchise schemes, and direct selling schemes that meet conditions listed in the Order are exempted from the Act.

### **INVESTMENT BARRIERS**

Singapore has a generally open investment regime, and no overarching screening process for foreign investment. Singapore places no restrictions on reinvestment or repatriation of earnings and capital. However, Singapore maintains limits on foreign investment in broadcasting, the news media, domestic retail banking, property ownership, and in some government-linked companies. Singapore's government has in the past conditioned approval of licenses to foreign financial service providers and telecommunications service providers on their agreement to performance requirements or commitments to transfer certain additional functions to Singapore. The United States-Singapore FTA prohibits certain performance-related restrictions on investors, such as limitations on the number of service locations.

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## **ELECTRONIC COMMERCE**

There are no significant barriers hindering the development and use of electronic commerce in Singapore. The United States-Singapore FTA contains state-of-the art provisions on electronic commerce, including national treatment and most favored nation obligations for products delivered electronically, affirmation that services disciplines cover all services delivered electronically, and permanent duty-free status of products delivered electronically.

Singapore considers the Internet to fall within the scope of its restrictions on broadcasting, as outlined in the Broadcasting Act. All Internet Service Providers (ISPs) must channel all incoming and outgoing Internet traffic through Internet Access Service Providers (IASPs) who function as main “gateways” to the Internet. IASPs must block access to one hundred Internet sites that the Singapore government considers obscene, excessively violent, or likely to incite racial or religious conflict. The Singapore government states that the list of sites is updated annually, but the list is not made public, and the process by which sites are placed on the list is not transparent. While other sites may be considered similarly objectionable, no effort is made to block access to sites beyond the one hundred listed sites. ISPs and IASPs are required to be licensed with the MDA. Internet Service Resellers, Internet Content Providers (ICPs), individuals who put up personal web pages, software developers and providers of raw financial information and news wire services do not have to register with the SBA, but ICPs or individuals who provide web pages for political or religious causes must be licensed by the MDA.

## **OTHER BARRIERS**

### **Competition**

Singapore has an extensive network of GLCs, which are active in many sectors of the economy. Some sectors, notably telecommunications, power generation/distribution, and financial services, are subject to sector-specific competition regulations and regulatory bodies. Some observers have raised concerns that GLCs may act in anticompetitive ways, a charge government officials strongly deny. The United States-Singapore FTA contains specific conduct guarantees to ensure that commercial enterprises in which the Singapore government has effective influence will operate on the basis of commercial considerations and will not discriminate in their treatment of U.S. firms. In accordance with its United States-Singapore FTA commitments, Singapore enacted the Competition Act 2004. The Act will be implemented in three phases, beginning with the establishment of a Competition Commission on January 1, 2005, followed by completion of implementing regulations (except for mergers and acquisitions) by approximately January 2006, followed by implementing regulations for mergers and acquisitions by approximately January 2007. There are also obligations in the FTA for greater transparency on government enterprises with substantial revenues or assets.

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## **Transparency**

The United States welcomes actions by Singapore to circulate more draft laws and regulations for public comment. It is our expectation that all legislation drafted to implement the United States–Singapore Free Trade Agreement will be made available for public comment in advance of finalization and submission to Singapore’s Parliament, keeping with the transparency obligations of the FTA.