

Public Consultation on Developing Singapore's Long-Term Low Emissions Strategy

Submission on 30 September 2019 via email to NCCS Contact (PMO) <NCCS_Contact@pmo.gov.sg> in response to a public consultation exercise from 16 July 2019 to 30 August 2019 (extended and closed on 30 September 2019) on Singapore's low carbon emissions strategy beyond 2030.

Consultation Details

The public consultation seeks views on measures and actions that can be taken by the Government, businesses, households, and individuals towards becoming a low carbon global city-state. The key areas where views are sought are as follows:

- i) Improving energy efficiency across all sectors
- ii) Encouraging responsible climate action through carbon pricing
- iii) Reducing emissions from power generation, increasing alternative energy sources
- iv) Deploying emerging low-carbon technologies
- v) Encouraging collective climate action
- vi) Tapping on green growth opportunities

Source: <https://www.nccs.gov.sg/media/news/articles/detail/government-seeks-views-on-singapore-s-long-term-low-emissions-strategy>

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Dear NCCS,

This is a follow-up email to my last clarification email on 7 August 2019. This email does not represent the views of the Energy Studies Institute, NUS but are my personal views as a private citizen.

Firstly, I thank NCCS for extending the Public Consultation from timeframe by a month. It has been helpful in allowing busy Singaporeans (myself included) in putting together our thoughts, and to take into consideration developments such as the UN Climate Action Summit, Global Climate Strike and two recent IPCC Special Reports on Land and the Ocean and Cryosphere.

My thoughts on the 2050 Public Consultation Document are as follows:

Data Timeliness and Emissions Growth Trajectory

While I appreciate and sympathize with Singapore's national circumstances when it comes to addressing climate change, I am of the view that the data presented in the 2050 Public Consultation Document, as well as the National Communications, Biennial Update Reports and Climate Action Plan are 1) not up to date and 2) do not reflect accurately Singapore's emissions growth trajectory. This has implications on how Singaporeans approach climate action.

On the issue of timeliness of emissions data, I am aware that Singapore's submissions to the UNFCCC are in line with relevant decisions, including Decision 1/CP.16, paras 48-51, Decision 2/CP.17, Decision 21/CP.19 and its Annex, and Decision 14/CP.19 etc., requires Singapore as a developing/Non-Annex I Party to "cover, at a minimum, the inventory for a calendar year no more than four years prior to the date of the submission, or more recent years if information is available, and that subsequent biennial update reports shall cover a calendar year that does not precede the submission date by more than

four years". It is imperative that Singapore does not take Decision 2/CP.17, para 41(g) at face value and continue to submit inventory that is four years out of date. Without up-to-date emissions data, it is not possible for researchers and members of the public to get an accurate sense of where Singapore stands, much less the urgency of having to tackle climate change.

Second, while I am heartened that Singapore's emissions CAGR grew at 2.0% compared to GDP CAGR of 5.5% from 2000 to 2014, it is worrying that this way of portraying the data avoids sharing that Singapore experienced an increase of emissions of 32.8% (12,579 Gg CO₂eq) from 2000 to 2014. Furthermore, as the 2050 Public Consultation Document only gives a snapshot of the 2000 – 2014 data, having compared the BUR2 against BUR3, it is clear that there was an emissions increase of 26% (9,839 Gg CO₂eq) from 2000 to 2012 and compared to an increase of 32.8% (12,579 Gg CO₂eq) from 2000 to 2014, yet there is no explanation why this is the case. Although the UNFCCC decisions do not require it, I hope that Singapore can continue to be a leader as it has in transparency reporting, and to consider providing more recent information. If this is not possible to do in an internationally facing document, perhaps NCCS can provide explanations to select groups within Singaporean society.

Nationally Determined Contribution

I thank NCCS for sharing Singapore's commitment and pledge to reduce our emissions intensity by 36% from 2005 levels by 2030, as well as to stabilise emissions with the aim of peaking around 2030. I have attempted the calculations myself, and tried to explain it to participants in a workshop. It is generally confusing because of the GDP figures being rebased to 2010 levels since 2014. It would be helpful to know if rebasing GDP is part of the trajectory calculations, and if this effectively renders Singapore's NDC to be a "moving target". Second, based on my understanding, in order to get to at a reduction of 36 emissions intensity, Singapore's projected emissions intensity level would need to be 114.205 tCO₂/S\$m GDP in 2030 but we'd need the following data: Total emissions for 2030 and Nominal GDP for 2030. Without both information made publically available, it is not possible to understand whether Singapore is on track or not. Can NCCS provide this information to the public?

There is also currently a window open for Governments to submit an updated NDC in 2020 pursuant to Article 4, para 9 of the Paris Agreement, as well as stated in Decision 1/CP.24, para 22 and Decision 4/CMA.1, para 7 "All Parties are requested to submit the next round of NDCs (new NDCs or updated NDCs) by 2020 and every five years thereafter (e.g. by 2020, 2025, 2030), regardless of their respective implementation time frames". I understand that given that the Katowice Climate Package was only recently agreed in December 2018, it may be challenging to provide information necessary for clarity, transparency and understanding as applicable to the NDC by 2020, but I would point to the fact that the paragraph only "strongly encourages" parties to do so. This should not deter Singapore in submitting a more ambitious NDC in 2020. There has not been any announcements by NCCS or the Government on whether Singapore intends to submit a more ambitious target and it would be useful to know if we do or do not, and the reasons behind the decision.

Key Strategies

On the key strategies outlined in the 2050 Public Consultation Document, I would like to provide the following feedback and questions:

- How successful has the ECA 2013 (and its amendment in 2017) been in improving industrial energy efficiency? Can the public have access to aggregated information on the improvements?
- What is the quantum of grants out of the various incentive schemes that has been disbursed since the ECA came into effect in 2013? Has this been a cost-effective way of addressing industrial energy efficiency?
- What are the challenges foreseen in carrying out periodic Energy Efficiency Opportunities Assessments (EEOAs)? I understand from the website www.eeoasg that there are currently

only 9 EEO assessors. Is this sufficient to carry out EEOAs in the future? What is needed to ensure a steady pipeline of qualified ESCO professionals to do this?

- On the carbon tax rate review by 2023, what international climate change developments does NCCS deem important to take into consideration? Will NCCS consider a science-based approach where IPCC reports are factored in? Is there a transparent matrix or criteria that NCCS can share with the public on how the doubling or tripling of the carbon tax rate will result in emissions reductions?
- Which markets does Singapore plan to link up with, in terms of carbon markets? Can research institutions, members of the public (apart from just “companies here” listed in the document) be consulted too with regard to linking Singapore’s carbon tax framework?
- On power generation, is solar displacing fossil-fuel power generation? What can be done to nudge our energy mix towards having a greater share of renewables?
- From whom does Singapore plan to import clean energy in the region from? Does this come at a cost, domestically?
- Can electric vehicles run fully on renewable or solar power in Singapore?
- Can the Government, having already implemented the zero-growth cap in COEs, seek to reduce the COEs to reduce vehicle population over the next few years?
- What are emissions implications on PMDs, since they run on electricity?
- On waste-to-energy (WTE), what are the implications of a zero waste nation on WTE contribution to Singapore’s energy mix? Can the Government clarify its stance on plastics incineration, given that the document cites its contribution of 7% of total carbon emissions from all power generation for electricity?
- On green financing and related issues, what is the climate risk to Singapore’s national reserves (GIC) and Temasek Holding’s investment portfolio? Can NCCS, or MAS clarify if TCFDs should be made applicable to GIC and Temasek Holdings, at least internally to Government if this is too sensitive to disclose publically?

Timeline of the LED development

Finally, I would like to seek clarification again regarding the timeline for NCCS in producing the LEDS. I understand that Article 4.19 of the Paris Agreement encourages its signatories to formulate and communicate long-term low GHG emission development strategies (LEDS) to the UNFCCC by 2020, mindful of Article 2 of the Paris Agreement and taking into account their common but differentiated responsibilities and respective capabilities, in the light of different national circumstances. This is reiterated in Decision 1/CP.24, para 21 of the Katowice Climate Package. As such, Singapore would likely have only 3 months following the public consultation’s conclusion to incorporate feedback. How does NCCS plan to incorporate feedback and will there be a report released?

I thank you for taking the time to read and consider my feedback. I sincerely hope there can be a synthesis of the public feedback in a report, and look forward to participating in any upcoming engagements that might be organized by NCCS to improve public engagement towards encouraging collective climate action in Singapore.

Thank you,
Melissa Low

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