

Dear NCCS Team,

I refer to your call for [Public Consultation on Developing Singapore's Long-Term Low Emissions Strategy on the REACH website](#).

Context

I note that

- Speak for Climate has come up with [resource portal](#) to provide ideas for feedback.
- LepakInSG has emailed their [consolidated feedback](#). They have also made this public on the Speak for Climate website.
- WWF Singapore has also provided an [email template](#) for people to conveniently email out to NCCS.
- Individuals such as [Bertrand Seah](#) and [Tammy Gan](#) has also made their feedback public.
- Just on Saturday 28 September, a group of youths organised a [Guided Public Consultation](#). The turnout was big.
- Today, myself and my teammates from [Singapore Youth for Climate Action](#) are sending our feedback separately.

Based on these items listed above, suffice to say, there is much interest in the NCCS Public Consultation, and that NCCS has a long list of feedback and demands to analyse and consider.

In my feedback for this NCCS Public Consultation on Developing Singapore's Long-Term Low Emissions Strategy, I want to focus on the document section E) Encouraging Collective Climate Action, and I ask for transparency and accountability.

First, I am aware that Singapore, as with other governments uses a [methodology proposed by the Intergovernmental Panel on Climate Change \(IPCC\) to estimate greenhouse gas emissions and removals](#). Based on that, I understand why Singapore positions our contributions to global emissions in a certain way.

That said, I also note emissions from international bunkers (aviation and marine) and CO2 emissions from incineration of non-fossil based fraction of solid waste have been included as a memo item in our GHG inventory. [In line with the IPCC guidelines, memo items are reported but excluded from national greenhouse gas inventory and national greenhouse gas totals](#).

In the document, NCCS asks: "What other actions can you as an individual or a member of the community undertake to drive climate action" and "How can we

encourage businesses and organisations to take climate action and practice 3Rs within their operations?"

In taking any action, we need to have information.

Here, I ask NCCS, as the coordinating agency for all the Ministries, to work closely with agencies such as the Maritime Port Authority and the Civil Aviation Authority of Singapore, to encourage transparency and accountability, by publishing a list of companies and their emissions which are not accounted in our national greenhouse gas inventory and national greenhouse gas totals.

Let the public see how much emissions are coming out from these companies. As companies operating in Singapore, they need to be transparent on how much emissions they are producing. As members of the public, let us see these records and push them to be accountable and reduce emissions further.

The mechanisms could be similar to the 'comply or explain' basis the Singapore Exchange (SGX) has taken. [SGX has made it mandatory for all listed companies to report their environmental, social and governance practices from the financial year ending Dec 31, 2017 onwards.](#) This practice is a step up from the voluntary sustainability reporting regime that has been in place since 2011.

I am aware that for the shipping industry for example, [the International Maritime Organisation \(IMO\) has set a limit for sulphur in fuel oil used on board ships of 0.50% m/m \(mass by mass\) from 1 January 2020.](#) Under the new sulphur limit, ships will have to use fuel oil on board with a sulphur content of no more than 0.50% m/m, against the current limit of 3.50%, which has been in effect since 1 January 2012.

In this regard, NCCS and MPA can work out a system where it is first voluntary and then mandatory. The important thing is to have a public long-term record of emissions, specifically sulphur emissions, from individual companies, to keep them accountable. It will also inform the public of how much emissions we are actually producing and reach out to these companies to reduce emissions.

This is one way we can encourage collective climate action.

In the [National Statement by Prime Minister Lee Hsien Loong at the 74th Session of the United Nations General Assembly](#), PM Lee mentioned "we are committed to do our full share under the Paris Agreement to reduce emissions and mitigate global warming."

It is not enough we do our part following the Paris Agreement, we must do more. We must take into account emissions which are not accounted in our national greenhouse gas inventory and national greenhouse gas totals and be responsible for it.

Second, I am aware, [in accordance with Article 4, paragraph 19, of the Paris Agreement \(at COP21 which happened in December 2015\). Parties have to communicate their long-term low greenhouse gas emission development strategies by 2020.](#)

The NCCS-REACH Public Consultation period is 16 July 2019 to 30 September 2019. Given this timeline where Parties have to submit their Long-Term Greenhouse Gas Emission Development Strategies (or LED for short) by 2020, I wonder if this is an appropriate way of seeking public feedback. Should we not have a draft copy of the LED before it is submitted to the UNFCCC? Why are we being asked to provide feedback on general questions now?

I am hopeful that this consolidation of feedback will still be integrated somehow.

In line with efforts to encourage capacity-building at international, regional, and local levels, I ask NCCS to continue engagement with the public, especially civil society groups which has been growing in the past months, and together with the Ministry of Environment and Water Resources as the outreach arm, to work closely with all stakeholders and educate and inform us of the efforts that are happening at the Ministry level, and to allow us to give regular feedback effectively.

At the [UNFCCC, we talk about capacity-building at the individual, institutional, and systemic level.](#)

Based on my personal observation, I think individuals have different knowledge and perceptions of what the Singapore government is doing, and therefore have different proposals and demands on what should be done.

If Singapore wants to create systemic change, we must first change individual attitudes and behaviours, impart knowledge and develop skills, as well as create a sense of ownership.

I think efforts to bring everyone on the same page in terms of what Singapore is doing and the constraints we are facing is crucial.

In this regards, I have three recommendations.

In addition to the generic public communication that we currently see, NCCS and MEWR can consider other activities such as organising regular town halls with civil society groups such as Green Drinks Singapore, Singapore Youth for Climate, and SG Climate Rally, to communicate what is being done and share challenges, as well as to hear feedback from the people. I go back to this point of Encouraging Collective Climate Action. If NCCS is serious about doing this, then there has to be regular and effective platforms for NCCS and for the public to encourage collective climate action.

Personally, I had the opportunity to write a [commentary for CNA](#) recently and in my call to action I emphasised on individual action that can create systemic changes to drive climate action. We need to create an environment where people are informed and regularly communicate with each other to drive climate action further.

NCCS and MEWR can consider activities such as an annual climate related workshop to impart knowledge and skills to others. I note Singapore Youth for Climate Action and Energy Studies Institute for example have organised workshops and gatherings over the past few years to do just this. However, we are limited by finance, manpower, and outreach. NCCS and MEWR as the largest body who can do this, needs to consider developing this and reaching out to more people.

NCCS and MEWR can also consider sending civil society delegations to the annual UNFCCC COPs. I note that previously ECO Singapore, Singapore Youth for Climate Action with the support of Avelife, and National University of Singapore with the support of Energy Studies Institute, have sent delegations. Again, I emphasise, putting together a COP programme, assessing a potential delegate, training them, and coordinating an overseas trip, requires a lot of commitment. It is especially draining if we have been doing this voluntarily. If Singapore is really serious about developing our people, it needs to step up and dedicate a personnel or a team to do this as well.

With the recommendations above, I reiterate that capacity building efforts such as regular town halls, annual climate workshops, and sending civil society delegations to COPs, enhances transparency and accountability. I think Singapore is good at pushing for transparency and accountability when it comes to local politics and governance issues. Let us do the same for environmental issues.

Conclusion

As a Singapore citizen, I have trust in the Singapore Civil Service. I have confidence that NCCS and all the other Ministries and agencies are doing their best in Developing Singapore's Long-Term Low Emissions Strategy. I have no doubt that people working on this are talking to various entities including Ministries, agencies, businesses, institutions, and community groups, to understand their needs and challenges as well. The Civil Service would have a better overview on what's happening and what can be done. We have the best and brightest minds analysing our policies and mapping out action plans. I hope NCCS considers all the feedback and replies it receives from this Public Consultation and attempt to incorporate this into the long-term strategy.

If there is a public engagement session planned, I hope NCCS considers inviting Singapore Youth for Climate Action (SYCA) to the table too.

I look forward to a Summary Report of this Public Consultation as well as the Long-Term Low Emissions Strategy Communications.

Warmest Regards

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