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Chapter 9

Trade Facilitation in Singapore and Results of the ASTFI Baseline Study¹

Ponciano Intal Jr., Jonathan Koh, and Edo Setyadi

1. Introduction

Singapore is an acknowledged global leader in trade facilitation. Its clearance process by border agencies, including customs, was ranked first globally on the World Bank's 2016 Logistics Performance Index (LPI), while its overall LPI ranking was fifth. Singapore's ranking slipped somewhat in the 2018 report to sixth for the customs LPI and seventh on the overall LPI. However, given the inherent impreciseness of the ratings, it could be argued that there is virtually no significant difference amongst the front-running countries, which include Singapore.

Singapore was ranked first on the World Economic Forum's 2016 overall Enabling Trade Index and on Pillar 3: efficiency and transparency of border administration. On the Organisation for Economic Co-operation and Development (OECD) Trade Facilitation Indicators in 2017, Singapore scored the highest value in the majority of the variables. In the World Economic Forum's 2017 Executive Opinion Survey, it was ranked first on efficiency in the clearance process. Table 9.1 summarises the result of the Domestic Logistics Performance Index, based on an online survey of logistics professionals (global freight forwarders and express carriers) based in Singapore. The survey results show stand-out evaluations of the efficiency of the customs clearance process (and other border processes) as well as the quality of infrastructure during 2016–2018. Nonetheless, the responses indicate the need for improvement in some areas during the same period, especially on the competence and quality of services. It should be noted that perceptions-based data such as the LPI have inherent biases. Hence, small changes in percentages may not mean much. Yet, a substantial gap from the best possible outcome, especially if persistent, can be indicative of the need for improvement.

Singapore developed the world's first electronic National Single Window (NSW) in the 1980s. The country's excellent achievements in trade facilitation result from its prioritisation of the issue and a forward-looking, whole-of-government approach.

In view of the global prominence of Singapore in trade facilitation, this chapter focuses on the historical and institutional developments that have made the country a global stand-out in this area. It reviews the development of Singapore's NSW, and discusses innovations in Singapore's customs which may be a model for many of the Association of Southeast Asian Nations (ASEAN) Member States (AMS). It then examines the ASEAN

¹ This report is based on the 2018 data of the ASTFI baseline study survey.

Seamless Trade Facilitation Indicators (ASTFI) results and concludes with remarks on the way forward.

Table 9.1: Domestic Logistics Performance Index – Singapore, 2010–2018

		2018	2016	2014	2012	2010
Indicator		Percentage of respondents answering low/very low (%)				
Quality of infrastructure Evaluate the quality of trade and transport related infrastructure (e.g. ports, roads, airports, information technology) in your country of work	Ports	0	0	0	0	0
	Airports	0	0	0	0	0
	Roads	0	0	0	0	0
	Warehousing/transloading facilities	0	0	0	0	0
	Telecommunications and IT	0	0	0	0	0
		Percentage of respondents answering high/very high (%)				
Competence and quality of services Evaluate the competence and quality of service delivered by the following in your country of work	Road	50	64	43	75	100
	Air transport	88	91	57	100	100
	Maritime transport	75	91	71	100	100
	Warehousing/transloading and distribution	63	82	71	100	90
	Freight forwarders	75	82	71	100	100
	Customs agencies	88	100	83	100	100
	Quality/standards inspection agencies	63	91	67	100	100
	Health/SPS agencies	71	91	67	100	100
	Customs brokers	75	100	86	100	100
	Trade and transport associations	50	90	67	100	90
Consignees or shippers	63	82	67	100	80	
		Percentage of respondents answering often or nearly always (%)				

Efficiency of processes Evaluate the efficiency of the following processes in your country of work	Clearance and delivery of imports	100	100	100	100	100
	Clearance and delivery of exports	100	100	100	100	100
	Transparency of customs clearance	88	100	100	100	90
	Transparency of other border agencies	86	91	100	100	
	Provision of adequate and timely information on regulatory changes	75	100	86	100	90
	Expedited customs clearance for traders with high compliance levels	100	91	86	100	90

IT = information technology, SPS = sanitary and phytosanitary.

Source: World Bank (2018), Domestic Logistics Performance Index.

<https://lpi.worldbank.org/domestic/performance> (accessed 1 June 2018).

2. Development and Characteristics of Singapore's National Single Window

Many traders use Singapore as a hub for the trans-shipment of goods via vessels and aircraft. The country provides an ample free trade zone to attract international traders. Hundreds of multinational corporations and shipping companies do business in Singapore. Since trade is a significant component of Singapore's economy, the government supports trade facilitation by providing the most efficient services to the international trading community, at competitive prices. Singapore's experience in establishing its single window initiative is a testimony to this.

In 1985, Singapore was hit by a recession. A high-level economic committee convened at the time identified the improvement of external trade as a major goal, highlighting that the use of information technology (IT) could make a significant contribution to Singapore's long-term competitive position. The committee's report was an important mobilising factor in the realisation of Singapore's single window, implemented in 1989 under the name of TradeNet. This was the world's first nationwide electronic single window. After more than 20 years and many upgrades, TradeNet remains the key pillar of Singapore's trade facilitation efforts and an enabler of its external trade, which totals nearly four times the gross domestic product.

Singapore's TradeNet has had a tremendous impact on the country's trade facilitation environment. Before TradeNet, the processing time for permits was up to 2 days and involved 4–35 documents (UNECE, 2010). After TradeNet, 99% of all permit applications were processed within 10 minutes electronically. The sharp reduction in the time taken to process permit applications resulted in about 9.1 million permits being issued per year from fiscal year (FY) 2013 to FY2017. In addition, the fees charged are one-sixth to one-

third of the amount charged before TradeNet. Furthermore, TradeNet integrates the requirements of 35 controlling units. The tremendous success of Singapore's TradeNet lies in its overall 'single platform and single submission' approach, which has resulted in streamlined and integrated processing. The extremely fast permit processing of over 9 million trade declarations for more than 12,000 users, involving 32 controlling units, is due primarily to the integration of all the requirements of the 32 controlling units.

In 2016, a new generation trade information ecosystem was announced. The National Trade Platform (NTP) seeks to facilitate both business-to-business (B2B) and business-to-government (B2G) transactions. It puts Singapore's trade facilitation platform on a new and higher level. Other than migrating existing B2G services, the NTP is designed to be an innovative platform for new and improved services to enhance traders' efficiency and competitiveness. The NTP has partnered with banks in Singapore to set up a trade-centric multi-bank trade finance application portal as well as a trade finance compliance service to help enhance traders' financing application processes. Other services that enhance traders' experiences are (i) the Permit Return service, which provides traders with a copy of their permits; and (ii) the digital Hand-Carried Exports Scheme, which allows exporters to retrieve proof of clearance digitally. On international connectivity, the NTP allows for the electronic submission and exchange of a Preferential Certificate of Origin between Singapore and China, as well as online applications for and transmission of an electronic Certificate of Non-Manipulation to China. The NTP brings certainty through the authenticity of the Preferential Certificate of Origin and Certificate of Non-Manipulation, and reduces the business costs associated with handling and transportation of paper documentation.

Underpinning the innovations in the NTP is the aim to make Singapore the world's leading trade, supply chain, and trade financing hub. Indeed, as Singapore is facing stiffer competition from other ports in the region, it is precisely an integrated trade, supply chain, and trade finance ecosystem that gives Singapore a continued edge over other ports in the region as a global and regional trans-shipment hub.

3. Customs, Trade Facilitation, Risk Management, and the Whole-of-Government Approach

'Unlike most customs authorities in the world, [Singapore Customs'] primary mission is in trade facilitation' (Singapore Customs, 2010: 4).

Trade is the lifeblood of Singapore, and as such, the mindset of Singapore Customs is to 'regulate trade [in order to] enable trade to flow quickly and smoothly in, out and through Singapore' (Singapore Customs, 2010: 12). To some extent, this makes Singapore an unrealistic reference point for a number of AMS with much larger populations, domestic markets, and industries than Singapore. Nonetheless, the Singapore experience provides some insights for regulating trade so that it flows as quickly and smoothly as possible and can become a strong pillar for development in any AMS. The three major insights are the following: (i) balancing trade control and trade facilitation with effective risk

management; (ii) a whole-of-government approach to both trade control and trade facilitation, and (iii) customs as forward-looking and a driver of partnerships.

3.1. Merging Trade Control and Facilitation with Risk Management²

Rather than seeing them as opposites, Singapore Customs regards trade regulation and trade facilitation as two sides of the same coin – contrasting roles that are essential for each other. To achieve both objectives without compromising either one is a challenge, given Singapore's large trade volume. For Singapore Customs, this is where risk management is key.

Singapore Customs plays the role of the trade highway police. As the regulator of trade, its main purpose is not to slow down trade flows, or even to penalise errant traders, but to facilitate smooth-flowing trade traffic and peaceful journeys for law-abiding traders. As such, facilitation and control are vital to each other.

But even the most vigilant highway police cannot keep an eye on every vehicle on the road – Singapore alone handles one-fifth of the world's total container trans-shipment throughput. Hence, to facilitate trade and protect revenue while securing Singapore's status as a trusted global trade hub, risk-based rules and procedures are used to govern its trade highway.

Under Singapore Customs' risk assessment system, traders' compliance records and willingness to cooperate are taken into consideration. Those showing a poor history of compliance are subject to more frequent interventions while the rest are not inconvenienced unnecessarily.

Risk management is a rigorous process whereby the control measures are constantly reviewed. Emerging risks that are detected in the operating environment are assessed, then appropriate adjustments are made or new control measures are incorporated to reduce risk exposures without hampering the flow of legitimate trade. Control measures are also in place to detect and deal with offences early so that the impact on trade is minimised.

The application of risk management to achieve both facilitation and control can be observed at various stages of the trade permit approval and goods clearance process. For every import consignment, a trade declaration must be submitted and approved electronically by Singapore Customs before it is allowed to clear the customs checkpoint.

3.2. Trade Facilitation and Integrated Risk-Based System³

Launched on 26 January 2011, the Trade Facilitation and Integrated Risk-Based System (TradeFIRST) is Singapore Customs' initiative for improving trade facilitation through better partnership with businesses. A single holistic framework that integrates facilitation, compliance, and risk management, TradeFIRST promises to make trade easier, fairer, and more secure. Finding a flexible and responsive approach that serves business needs has

¹ This section draws substantially from Singapore Customs (2011a).

² This section draws heavily from Singapore Customs (2011a).

been key for Singapore Customs to balance its twin roles of facilitating trade and ensuring the integrity of the trading system.

Recognising the increasing challenges faced by businesses and traders, such as the growing complexities and interdependencies of supply chains, Singapore Customs sought to strengthen and enhance the relationship between customs and the trading community even further. Reviewing existing transactions and relationships with businesses and traders, Singapore Customs found that despite the many facilitation schemes available in the existing system, companies were not always aware of them. A new approach was proposed – one that would transform the way customs facilitates and regulates trade.

TradeFIRST is a comprehensive assessment framework that integrates elements of facilitation, compliance, and risk management. A one-stop service, TradeFIRST enables Singapore Customs to engage with traders more proactively and facilitate business operations in a way that is systematic, risk-based, and consistent – thus supporting Singapore Customs' motto of making trade easy, fair, and secure.

Whole-of-Government Approach⁴

Singapore's early experience in developing its NSW – TradeNet – provided it with the insight that coordinated border management is fundamental to developing and sustaining an effectual trade facilitation environment.

Both the NSW and the coordinated border management mindset are complementary elements of Singapore's whole-of-government approach to providing efficient trade facilitation to the trading community. Using TradeNet, the trading community is able to submit permit applications electronically for processing, via a single point of entry to government agencies. All major agencies (known as Competent Authorities in Singapore) involved in regulating trade flows are part of TradeNet. The major realignments needed to support Singapore's NSW implementation were achieved through extensive discussions and consensus building with government agencies, companies, organisations, and industry associations. This focus on achieving a win-win outcome enabled all parties involved to overcome the initial difficulties, as they saw the potential savings and benefits from reducing the burden associated with handling trade documentation.

The journey to achieving a whole-of-government approach for trade regulatory issues did not start overnight. The business process re-engineering undertaken as part of Singapore's TradeNet implementation in 1989 provided a strong foundation for the then Customs and Excise Department, and partner government agencies involved in trade regulatory issues. This foundation was followed by further consolidation, continual improvements, and increased coordination over the years.

One of the most noteworthy developments took place in 2003, when the government recognised the need for greater synergy, and for a reorganisation of the trade and border

³ This section draws from Singapore Customs and the Immigration & Checkpoints Authority of Singapore (2015).

authorities in Singapore. This resulted in the formation of the Immigration & Checkpoints Authority (ICA) of Singapore as the single agency for checkpoints and border control functions, while Singapore Customs was established as the single contact point for all customs, revenue, and trade matters. Whereas the former Customs and Excise Department was mainly focused on revenue matters, the new Singapore Customs is vested with responsibility for both revenue and trade facilitation matters. This working arrangement allows the ICA and Singapore Customs to share the responsibility of securing Singapore's borders, and yet be effective in facilitating legitimate trade.

Improved Detection through Collaboration

Data are essential in the modern border regulatory environment. Effective risk management is heavily dependent on the availability of data, as well as the ability to integrate the available data so as to inform selectivity and tactical decision-making.

Through TradeNet, all agencies with border regulatory functions are able to process their respective regulatory requirements through an integrated single window interface. In this way, regulatory agencies can focus on their respective control areas, while the system provides the functionalities to route declarations to the relevant agencies and provide approval responses to trade.

However, the challenges of the modern trading environment require a higher level of sophistication. Agencies must not only focus on their respective control areas, but also recognise cross-cutting risks, and ensure coordination between different government stakeholders. The security and integrity of the trading system is not merely the job of one agency but affects the entire country.

With this in mind, Singapore Customs works closely with the ICA, using a risk-based approach, to identify shipments posing security risks and take steps to mitigate such risks through actions on the ground. The two agencies cooperate on joint risk profiling and targeting efforts, rendering operational assistance to each other when suspicious shipments are detected. Singapore Customs and the ICA consult with each other on decisions to inspect or interdict shipments when necessary.

Singapore's small physical size and labour constraints means that no single agency is able to discharge all of its regulatory responsibilities in a self-contained way. Agencies, by virtue of their specialisations, will best know the risks that affect the commodities under their control. Even though Singapore Customs and the ICA may have broad powers under the law to act on behalf of partner government agencies, both Singapore Customs and the ICA recognise that such authority needs to be exercised in collaboration with those partner agencies so that their specific knowledge of their domain can be brought to bear, for maximum success rates in detection and enforcement.

In this way, larger agencies, such as Singapore Customs and the ICA, which have stronger enforcement competencies and experience of cross-border regulatory offences, can provide support to other agencies for undertaking seizures and carrying out enforcement on suspicious shipments detected. Consequently, all agencies work together to achieve

the synergies necessary to meet their respective regulatory mandates, and contribute to the prosperity and security of the country.

Forward-Looking and Driver of Partnerships

Given that Singapore is highly dependent on trade and is a global trade hub, Singapore Customs has to be able to meet the challenges of the fast-evolving global business environment, especially the growing complexity of global supply chains, the growth of e-commerce, and the rising threat of terrorism, as well as concerns regarding the safety of international cargoes and the prevention of shipping as a tool for terrorism and crime. Towards this end, Singapore Customs has been forward-looking and a key driver of partnerships with a whole-of-government mindset.

Singapore Customs was a key player in the development and enhancement of TradeNet even though the Trade Development Board was the lead agency until April 2003 when Singapore Customs took over. Singapore Customs made TradeNet completely web-based in 2007 with version 4.0, established TradeXchange in 2007 to connect traders to the commercial systems of other countries, and started operationalising the NTP by 2017. Guided by its view that trade facilitation, compliance, and security are complementary, in 2007 Singapore Customs launched the Secure Trade Partnership, which is Singapore's national Authorised Economic Operator (AEO) programme as well as the national supply chain security programme. Singapore Customs has been engaged in discussions with other countries on the mutual recognition of supply chain security programmes. Singapore chaired the World Customs Organization working group to develop trade recovery guidelines to bring back trade to normalcy after disruptions to international trade flows after the 2007 Global Financial Crisis (see, for example, Singapore Customs (2010)). To ensure Singapore's continuing role as a global trade and logistics hub, Singapore has to anticipate evolving business and technological trends and as such needs to be forward-looking.

Singapore Customs also had to be a driver of partnerships, not only with the private sector (as its main clients) but also with other domestic and international agencies and governments, both in the region and globally. The discussion earlier in the report brings out the whole-of-government perspective to trade facilitation, control, and security. As supply chains are global and increasingly more complex, Singapore is strengthening partnerships beyond its borders towards more efficient end-to-end supply chain facilitation and security of international trade.

4. The ASTFI Baseline Results

4.1. Highlights and Key Findings of the ASTFI Scores

The questionnaire surveys on the ASTFI were conducted with 16 government agencies, including Singapore Customs and major agencies identified by the Singapore government. They consisted of seven components: (i) transparency and information on laws, regulations, and procedures; (ii) communication with and active engagement of the

private sector; (iii) release and clearance formalities; (iv) import/export formalities; (v) cross-border coordination and transit facilitation; (vi) transport facilitation; and (vii) e-commerce. The results of the survey are summarised below.

4.2. Transparency and Information on Laws, Regulations, and Procedures

Singapore has a high level of transparency with regards to customs-related information. Singapore's customs and major controlling agencies have websites with all the necessary information pertaining to each agency. Customs has a call centre. Information on Singapore's non-tariff measures (NTM) is available in the ASEAN Trade Repository (ATR) but is not commodity-specific.

4.3. Communication with and Active Engagement of the Private Sector

Singapore has a good record of government agencies, including customs, applying a client-centric philosophy. Government agencies consult with the private sector on new regulations and publish the draft regulations on both the agency websites and a centralised website for all new regulations in order to obtain feedback from concerned stakeholders and other interested parties. For example, private sector stakeholders were heavily consulted for major initiatives such as Singapore Customs' TradeFIRST. Moreover, the agencies provide public information on the likely impact of the proposed regulation(s) on the government, the private sector, and international commitments, amongst others. Thus, there is significant private sector involvement in new regulations as a matter of government practice. However, there is no institutionalised (not ad hoc) private sector membership of the National Trade Facilitation Committee.

4.4. Release and Clearance Formalities

Pre-arrival processing, an appeal and review mechanism, separation of release from final determination, and payment of customs duties and temporary admission are available and applied by Singapore Customs. Pre-arrival processing is available at the main port and other sea terminals; airports (Changi Airport and Airport Logistics Park); and on land (land borders with Malaysia). Singapore Customs also has various schemes available to suspend the payment of duties and goods and services taxes without guarantee (as well as with guarantee). Temporary admission is being implemented using the Admission Temporaire/Temporary Admission (ATA) Convention.

However, Singapore does not publish reports on dwell time and Time Release Studies. In terms of self-certification, since it is an ASEAN regional initiative, it is still in the pilot stage. Advance Rulings by customs are not fully published, as they are subject to the consent of the trader who/which asked for the ruling.

For best practice risk management, Singapore implemented an integrated risk management system under TradeFIRST. Launched in January 2011, TradeFIRST is a single holistic framework that integrates facilitation, compliance, and risk management to make trade easier, fairer, and more secure, in the context of the growing complexities and interdependence of supply chains.

Singapore Customs maintains an AEO programme as well as mutual recognition arrangements (MRAs) with a number of non-AMS administrations such as Australia, Canada, China, Hong Kong, Japan, the Republic of Korea, Taiwan, and the United States. Singapore also signed an AEO MRA with Thailand on 4 July 2018 – the first AEO MRA between two AMS.

4.5. Import/Export Formalities and Coordination

Singapore is excellent in customs and import/export processes, i.e. under the release and clearance formalities and import/export formalities. There is more work to be done on regional initiatives such as the ASEAN Single Window.

The discussion in the previous sections on the evolution of Singapore's NSW suggests that the essence of the more recent innovations in TradeFIRST and the NTP could be models for other AMS, albeit with some adaptation because of the unique circumstances of Singapore and the specificities of each AMS.

4.6. Cross-Border Coordination and Transit Facilitation

Institutional coordination with bordering and neighbouring countries appears to be limited. This is probably because both Singapore and Malaysia have relatively efficient processes on both sides of the land border such that there is no strong demand from stakeholders for institutional coordination arrangements (e.g. Singapore has pre-arrival processing on its land border with Malaysia). Nonetheless, there are a number of coordination platforms for cross-border transport issues with Malaysia, such as the Transportation Links Working Group.

The Immigration & Checkpoints Authority indicated that there is no coordination mechanism at the institutional or operational level with Malaysia, Singapore's only bordering country by land. However, the ASEAN Customs Transit System (ACTS), which has been pilot tested amongst Singapore, Malaysia, and Thailand, involves significant operational cooperation amongst the three countries for both goods and transport. The computerised transit system that Singapore Customs pilot tested in 2016 and 2017 has no transit guarantee mechanism in place. There are simplified procedures for Authorised Transit Traders, as determined by the contracting powers.

4.7. Transport Facilitation

Procedures for the issuance of ASEAN Goods Vehicle Cross-Border Permits are under development. The permits will be subject to technical requirements for the vehicles. The port community system is operational in the main port, but not yet linked to other AMS.

Singapore has ratified Protocols 1 (designation of transit transport routes facilities) and 4 (technical requirement of vehicles) of the ASEAN Framework Agreement on the Facilitation of Goods in Transit (AFAFGIT), and national laws and regulations are in place, but there is no implementation structure or system as yet. As of 2018, Protocol 2 had not yet been ratified, which means it is not yet operational. This also applies to the ASEAN Framework Agreement on the Facilitation of Inter-State Transport (AFAFIST) and ASEAN Framework Agreement on Multimodal Transport (AFAMT) – there is no ratification for

either of these ASEAN framework agreements by Singapore until 2018, but the Singapore Logistics Association has a registry of multimodal transport operators.

4.8. E-commerce

A legal framework for e-identification and authorisation has been established and is operational at the national level. However, harmonisation at the ASEAN level is still being considered. Singapore has a de minimis value, in line with the World Trade Organization Trade Facilitation Agreement, and is conducting a study on revenue collection frameworks on e-commerce trade. It is still working on a mechanism for e-commerce dispute settlement and a revenue collection framework for cross-border e-commerce trade, while collaborating with ASEAN on regional framework agreements.

5. Concluding Remarks and the Way Forward

Singapore is a global pioneer and an acknowledged stand-out in trade facilitation, with a customs administration whose primary focus is trade facilitation – unlike most customs authorities in the world. With the major exception of the information on NTMs, most of the slow progress areas are related to ASEAN initiatives or cross-border ASEAN facilitation.

Moving forward, apart from improving the country's NTM database accessibility, the key recommendation is related to Singapore's role as a catalyst and learning leader in ASEAN on trade facilitation, in light of the innovations and trade facilitation experience of Singapore Customs. Singapore's chairing of the ASEAN Customs Procedures and Trade Facilitation Working Group, ASEAN Single Window Steering Committee, Sub-Working Group on ASEAN AEO-MRA, and ASEAN Customs Transit System provides a platform to accelerate trade facilitation initiatives in ASEAN moving forward.

In addition, Singapore can support further ASEAN initiatives by ratifying and implementing ASEAN transport facilitation protocols and agreements as needed. After all, a well-performing ASEAN trade facilitation regime will benefit the country given its importance in value chains, logistics, and trade finance in the region and indeed the world.

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