

Feedback to CCCS

Public Consultation on Proposed Guidance Note on Business Collaborations Pursuing Environmental Sustainability Objectives ("Environmental Sustainability Collaboration GN")

S/No.	Question	Feedback from SICC
1	Statement of interest - State your interest(s) in submitting views on this subject.	The Chamber and its members recognise the increasing importance of sustainability in the way businesses operate. Therefore, there is a growing need for businesses to collaborate and work together to promote sustainability.
2	My view on the subject - Indicate confidential information in square brackets [].	<p>General Observations from members:</p> <ol style="list-style-type: none"> 1. "Sustainability" indicates the holistic and integrated approach encompassing economic excellence, environmental imperatives and social responsibility. Not only is the term "Environment Sustainability" a misnomer, the focus of the Government of Singapore is primarily on GHG emissions. Therefore, even the broad dimension of Environment is missed out. Hence, the title of the Guidelines could be revised to reflect the above context. 2. There could be a platform for businesses to be informed on various collaborations between companies. This could enhance awareness, disclosures or transparency practices and in turn obviate accusations or failure in governance. 3. Adoption (and creation) of voluntary guidelines or standards by business could be a great way to demonstrate responsible corporate behaviour that could be supported by the government. This could reduce the burden on the government and makes business accepted by its other stakeholders. 4. Any guidelines should not impede innovation. To ensure this, there needs to be checks and balances which could be possible with an efficient and effective review mechanism in place. In addition, it will be good to have in place two vital mechanisms: for grievance redressal and for dispute resolution. 5. To prevent anti-competition or cartelisation, there should be a close monitoring of any collaboration that represents a majority in the market, i.e., 20% or more in the market share. 6. A simple approach to collaboration could be the sharing of infrastructure when it comes to power and transport, improving technology to consume less materials, reuse what we can without adding to the carbon footprint.

~~ END ~~