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Customs and Trade Alert

The Customs and Trade Alert is an initiative of the Deloitte Customs & Global Trade group. This newsletter is your reference for practical information on relevant customs issues.

April 2014

Singapore Customs updates – Revised Strategic Trade Scheme (“STS”) regime

As an update to our last alert on the potential changes to the Strategic Trade Scheme (STS), Singapore Customs has implemented the revised STS. The revised STS has taken effect on 1 April 2014.

Under the revised STS, the permit structure is as follows:

- The “Individual Permit” shall be approved on a per transaction basis; and
- The “Bulk Permit” shall be approved for :-
 - Multiple products to Countries of Destination; **or**
 - Multiple products to Specific Entities.

Revised STS regime implementation timeline

Companies are given a 6 months adjustment period from 1 April 2014 to 30 September 2014 to transition and implement the new STS requirements.

What does it mean for you?

- The “Individual Permit” replaces the previous “Tier 1 permit” under the STS. Companies applying for the “Individual Permit” to cover the exports of strategic goods shall be assessed on a per shipment basis.
- The “Bulk Permit” replaces the previous “Tier 2 permit” and “Tier 3 permit” under the STS.
 - Companies previously having the “Tier 2 permit” status shall now be required to satisfy **all 7 Internal Compliance Programme (ICP) elements** in order to maintain the “Bulk Permit” status.
 - Companies involved in both intangible transfer of strategic technology (ITT) and exports of strategic goods shall be issued

with

- Companies are to take note of the following administrative changes:
 - Changes made to “Bulk permits” for companies involved in both intangible transfer of strategic technology (ITT) and exports of strategic goods;
 - Changes made to the declaration procedures for TradeNet permits for exports/transshipment covered by either type of STS Bulk Permits;
 - Revised documentary requirements for submission of a TradeNet permit under Bulk Permits.

What to do?

Considering the above changes to the STS, companies should:

- Evaluate the type of STS permit your company needs to apply for, in order to comply with Singapore Customs’ requirements and also meet your business needs – i.e. whether or not your current business model necessitates adopting the Bulk Permit model
- Critically assess the adequacy and robustness of the implemented processes and procedures of existing internal compliance measures adopted, to ensure all 7 ICP elements satisfies Singapore Customs’ requirements

Consider adopting new control measures in order to fulfil Singapore Customs’ requirements, in order to qualify under the Bulk Permit scheme – i.e. companies currently approved under the STS Tier 2 permit scheme (covering only 4 ICP elements) are at risk of having to revert to Individual Permits, if they are unable to fulfil the criteria under the revised STS regime for Bulk Permit approval..

How we can support

Deloitte can support your company in the following:

- Assess the impact of the changes to the STS permit regime, and to your company’s existing procedures and processes, and advise on the necessary measures to be taken to meet the revised criteria
- Provide support to your company to develop an ICP that satisfies the Singapore Customs’ revised requirements to qualify for Bulk Permit scheme
- Evaluate and review the current ICP adopted by your company to fulfil all the 7 ICP elements to ensure compliance to Singapore Customs’ requirements to qualify for Bulk Permit scheme
- Review your company’s STS Bulk Permit application, TradeFIRST checklist and necessary supporting documentation for submission to Singapore Customs.

For more information on the revised STS regime, or any Customs and Global Trade matters, please contact Diyanah Anuar (Tel: +65 6216 3351) or any of the contacts shown.

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