



Survey: DP holders working under an LOC

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EUROPEAN CHAMBER OF
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SUPPORTING ORGANISATIONS



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EXECUTIVE SUMMARY

This survey conducted by the European Chamber of Commerce (Singapore) and supported by 12 European Business Groups in Singapore) surveyed 266 individuals from various industries and organisational types.

The aim of the survey was to assess the potential impact of upcoming changes in legislation which previously allowed Dependent Pass holders to be employed under a Letter of Consent.

The intention of the survey is to raise awareness on the impact of the new legislation and the concerns it has brought to the community.

The report shows high impact in certain sectors such as Business Services, ICT, Tech and Engineering as well as Education / R&D. Furthermore, it is evident that the new legislation will impact multiple sectors and is not limited to foreign companies.

The report also indicates that the new legislation might make Singapore less attractive for expatriate employees as their spouse may not be able to find work under the new legislation. This may affect Singapore's ability to attract foreign talent and thus impact the business development in the country.

Introduction



Earlier this month, it was announced by the Ministry of Manpower (MOM) that legislation concerning the spouses and family of Employment Pass (EP) holders in Singapore has changed.

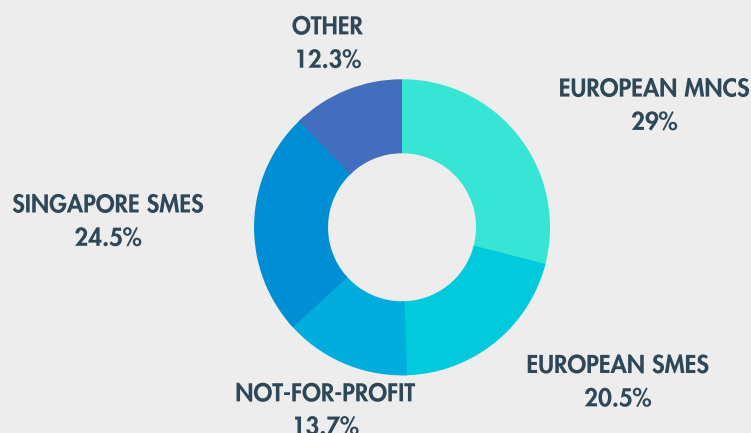
Starting 1st May 2021, companies and organisations employing Dependent Pass (DP) holders under a Letter of Consent (LOC), will now need to apply for one of the following passes: Employment Pass (EP), S Pass (SP) or Work Permit (WP), in order for these employees to continue their work.

DP holders already employed under an LOC will be able to continue until their LOC expires, and only DP holders who own a business may apply for a one-off extension until 30 April 2022 when next renewing their DP.

There are currently about 11,000 DPs in Singapore. For European companies and nonprofits, this change in legislation is of concern not only for expatriates living in Singapore but also for future international expatriates considering residence in Singapore.

RESPONDENT DEMOGRAPHICS

COMPANY TYPE

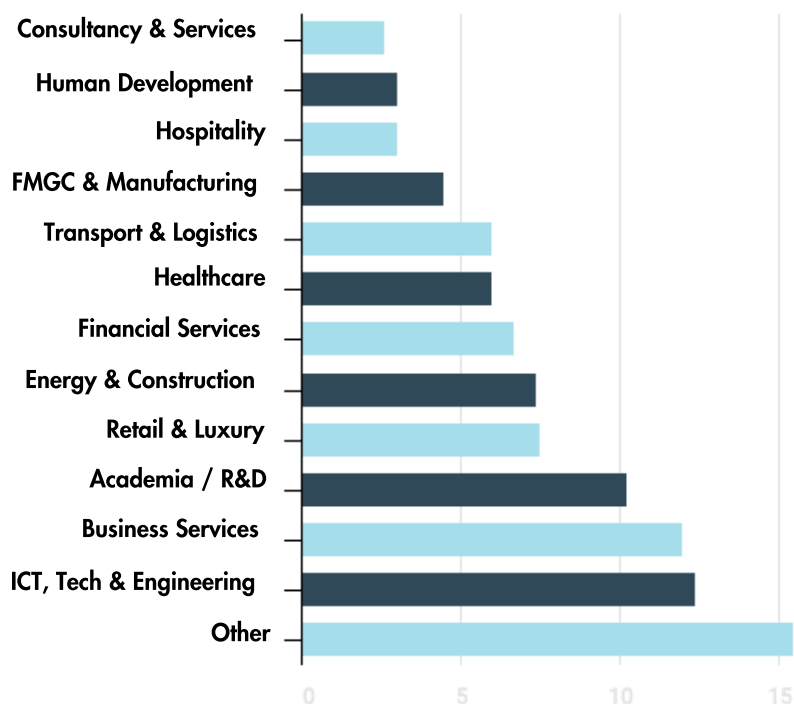


For this study, 266 individuals in the Singapore region were surveyed.

Large European Multinationals dominated the sample with 29%. This was closely followed by both small and medium sized Singaporean companies and European companies

13.7% of the companies surveyed were Not-for-Profit organisations operating in Singapore.

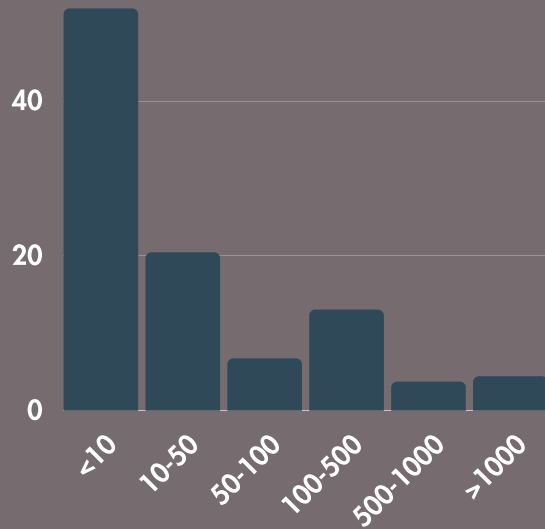
COMPANY SECTOR



Most sectors were represented in the survey. However, 12.4% of the respondents were employed within the ICT, Tech & Engineering sector. Business Services represents 12% closely followed by Academia / R&D with 10.2%.

The new legislation impacts a lot of smaller companies which falls under various different industries which is the explanation behind the larger 'other category'.

NUMBER OF PERMANENT EMPLOYEES IN SINGAPORE



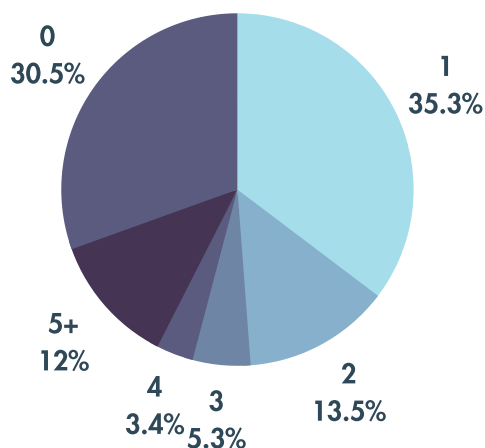
51.9% of the companies surveyed has less than 10 permanent employees in their office in Singapore.

20.4% employ 10-50 permanently while 6.7% employ between 50-100.

13% employ between 100-5000 while 8.1% employ more than 500 in their Singapore offices.

EMPLOYMENT OF LOCS

NUMBER OF LOC'S EMPLOYED BY THE COMPANY



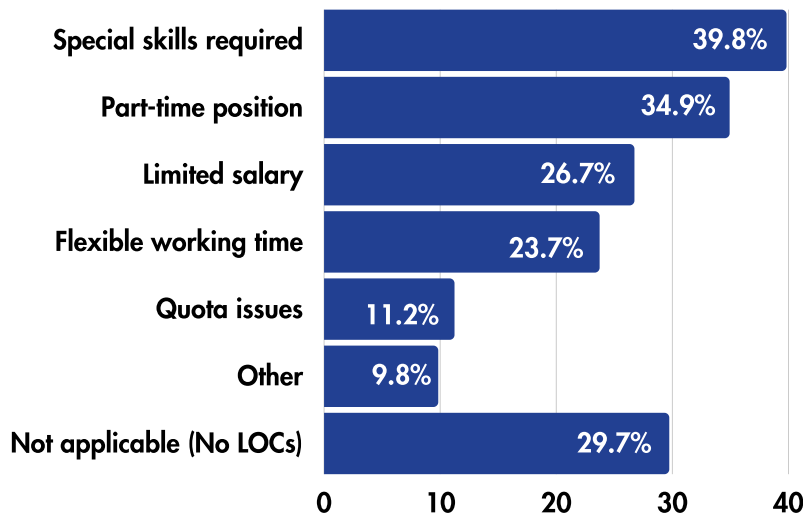
The majority of the respondents surveyed (35.3%) have one LOC employed in their company. 13.5% report that they employ two LOCs in their company while 8.7% responded that they have three to four employees on LOCs. 12% of the respondents shared that they employ more than 5 LOCs in their company with some employing up to 70 LOCs.

30.5% of the respondents shared that they do not employ any LOCs at this time. However, they would still like to share their point of view on the new legislation.

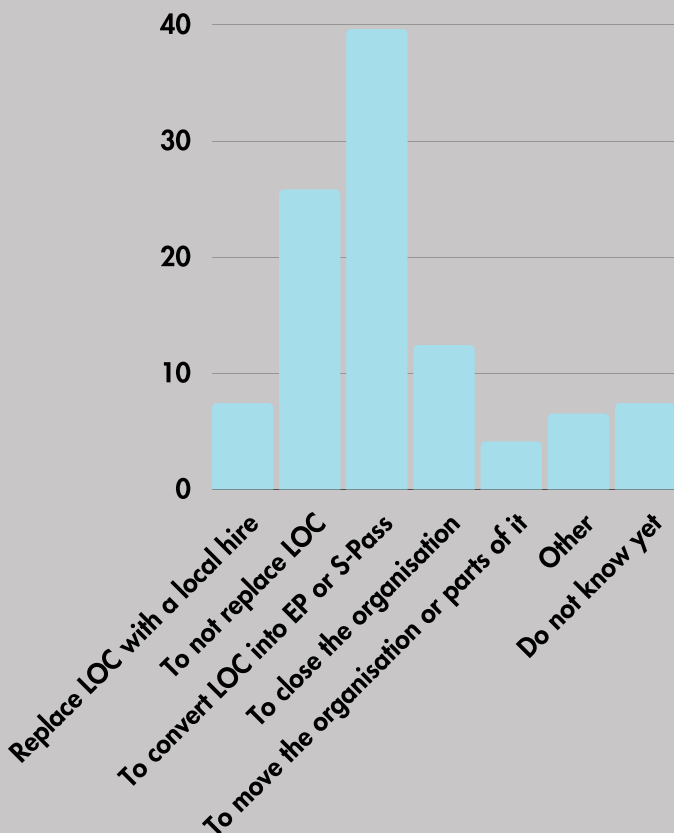
EMPLOYMENT OF LOCs

WHY DOES YOUR COMPANY EMPLOY LOCs

Multiple answers allowed



The participants provided a number of reasons for employing LOCs. For the majority, the main reason for hiring LOCs is a special skill requirement such as language which can be difficult to secure in the local workforce. For many of the participants this was the main but not sole reason. 34.9% hired LOCs as it is for a part-time position with 26.7% listing limited salary as a reason for hiring LOCs. For 23.7% of the respondents flexible working hours also played a role in the decision to hire a LOCs and only 11.2% listed quota issues as one of their reasons for hiring LOCs.

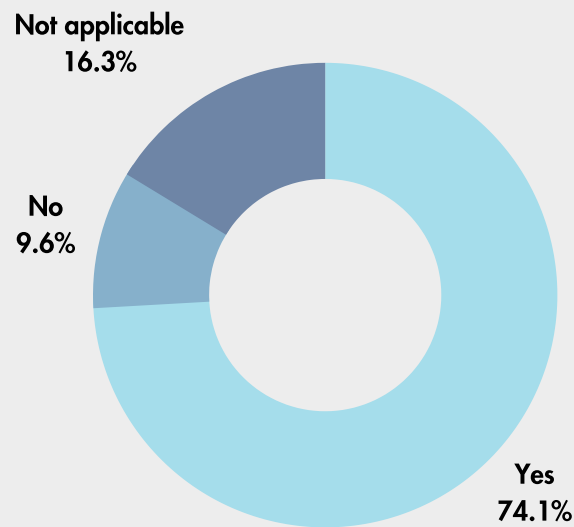


INTENDED PLAN ONCE THE LOC EXPIRES

The majority of the respondents hope to convert the LOCs into either EPs or S-Passes. However, at the present time they feel uncertain as to whether this will be possible. 25.6% of the participants will not be replacing their LOCs once the permit runs out whereas 7.4% expect to replace the LOC with a local hire. 4.1% will move the company or parts of it out of Singapore while 12.4% will be closing their company due to the new legislation.

THE IMPACT ON SPOUSES OF EXPATS

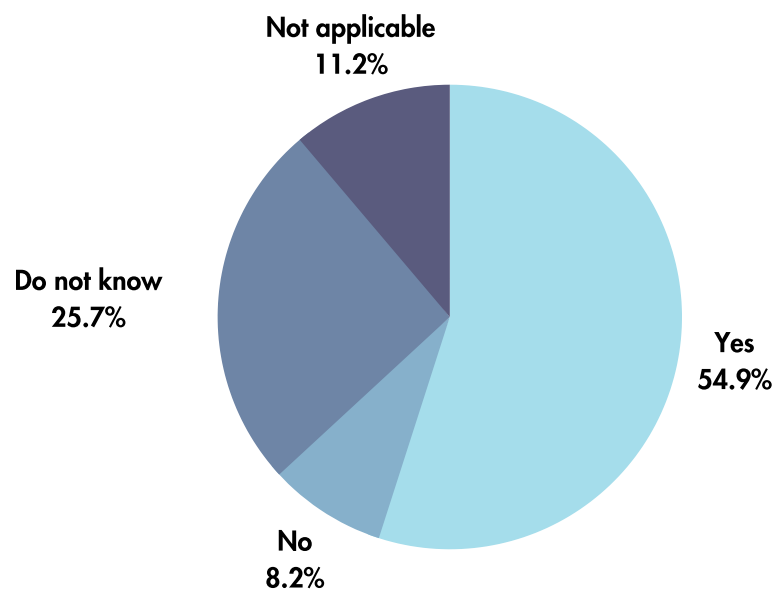
TO YOUR KNOWLEDGE, WILL SPOUSES OF EXPATRIATE EMPLOYEES IN YOUR COMPANY BE NEGATIVELY AFFECTED BY THE LEGISLATION?



More than two-thirds of the respondents believe that the new legislation will negatively affect the spouses of their expatriate employees. Only 9.6% responded that they do not believe it will have a negative impact while 16.3% find it not applicable to their organisation.

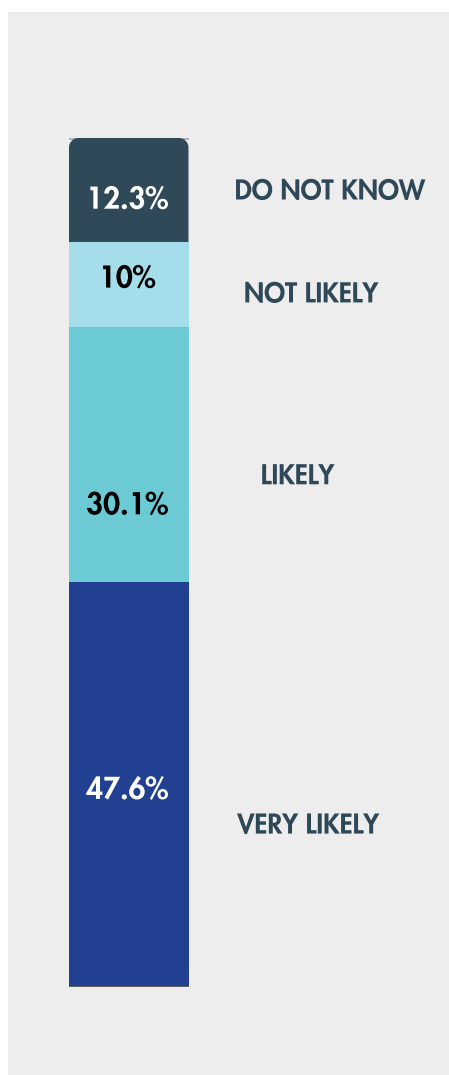
TO YOUR KNOWLEDGE, WILL THE NEW REGULATION PREVENT A SPOUSE OF ANY OF YOUR EMPLOYEES FROM STARTING A NEW BUSINESS IN SINGAPORE?

54.9% of the participants believe the new legislation will discourage the spouses of their employees to start a new business in Singapore. 8.2% do not think this will be the case while 25.7% do not know.



IN YOUR OPINION

IN YOUR OPINION, WILL THE NEW LEGISLATION HAVE A NEGATIVE IMPACT ON THE DECISION OF YOUR EMPLOYEES TO REMAIN IN SINGAPORE, OR TRANSFER TO SINGAPORE?



From the survey it is evident that the majority, 77.7%, believe that the new legislation will have a negative impact on the decision of the employees to remain in Singapore or to relocate to Singapore. This would be a barrier for companies to bring in the skilled foreign talent.

Only 10% of the respondents do not believe this will have an impact on the current employees or on future employees. 12.3% of the respondents do not know what the impact could be of the new legislation.

IN YOUR OPINION

IN YOUR OPINION, HOW DO EUROPEAN ORGANISATIONS (BOTH NONPROFITS AND BUSINESSES) CONTRIBUTE TO THE EMPLOYABILITY OF SINGAPOREANS IN THE FUTURE?

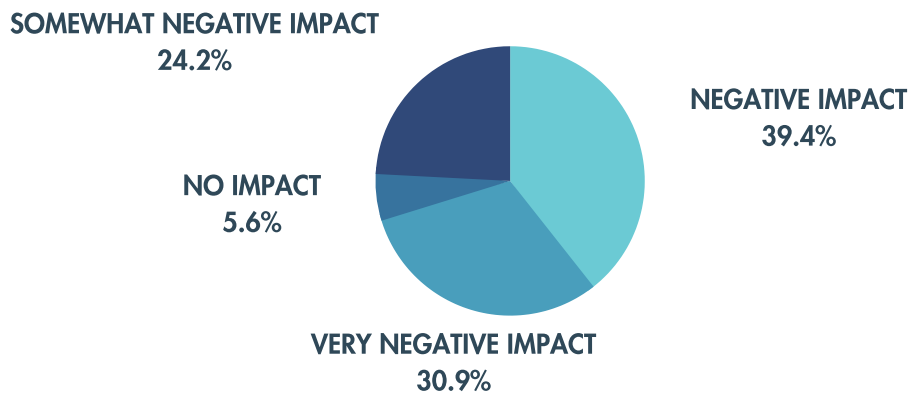
Multiple answers allowed

- 69%** Employing more Singaporeans for jobs in Singapore
- 22%** Increasing overseas distance work for Singaporeans living in Singapore
- 43%** Increasing international mobility of Singaporeans to work outside Singapore
- 53%** Investment in educating and training Singaporeans for the future of work
- 43%** Investing in innovation and research in Singapore
- 41%** Investing in startups in Singapore
- 38%** Promoting international mobility for the Singaporean workforce
- 7%** Other

69% of the respondents believe that the employment of Singaporeans has been an important contribution by the European organisations to the local workforce. 43% see an increase in Singaporean's international mobility to work outside of Singapore as a result of European organisations in the country and 22% have seen an increase in overseas distance work for Singaporeans. The respondents also evaluated highly the investments of European companies in Singapore. Those investments were worded in the survey as education and training of the local workforce, innovation and research as well as investing in start-ups in Singapore.

IN YOUR OPINION

IN YOUR OPINION, WHAT IS THE IMPACT OF THE NEW LEGISLATION FOR EUROPEAN COMPANIES AND NOT-FOR-PROFITS ON THE DESIRABILITY OF SINGAPORE TO LIVE AND WORK?



The majority of the respondents believe that the new legislation will have a high impact on the desirability to live in Singapore. There is a risk that this could implicate a bigger challenge to acquire new foreign talent

Only 5.6% disagreed and believe the new legislation will not impact the desirability of Singapore

IN YOUR OPINION, WHAT IS THE IMPACT OF THE NEW LEGISLATION ON EXPATRIATES CONCERNING THE ATTRACTIVENESS OF SINGAPORE?



35.9% of the respondents believe the new legislating will have a negative impact on the attractiveness of Singapore for expatriates whereas almost equally as many respondents believe the new legislation will have a very negative impact.

24.4% believe the impact will only be somewhat negative and only 4.1% of the respondents believe the new legislation will have no impact on the attractiveness of Singapore for expatriates

ANNEX: OPEN ENDED RESPONSES

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Families used to come to Singapore knowing the spouse would be able to work, with flexible hours. Being stuck at home when you are educated and used to have a career is not acceptable for many European women. A lot of them use their time in Singapore to be closer to their children but still need to work (for their sanity). It is very difficult to find part time jobs in Singapore. The only ones available do not pay well enough to justify an EP. It just sounds strange to me that Singapore wants to be an international hub, while refusing the right to work flexible hours to women/men (removing LOC means this to me).

Will negatively impact SMEs and Sole proprietors

The more and more hostile culture that is created by these kind of rules is underestimated. Expats start to feel less and less welcome in Singapore. It also makes it difficult for companies to manage talent. The notices are very short as well.

Our lives have been put on standby for a whole year, and we experience this as another burden to live in Singapore.

We expect to lose a lot of talents, and probably see the migration of these positions in our other locations in APAC.

Sadly these regulations are limiting women which are predominantly the DP holders in Singapore. The COVID-19 pandemic has unfortunately widened the inequality in the workforce and this new regulation is contributing to women falling behind professionally. It is impacting women founders of businesses and negatively impacting businesses as a whole

The environment has become increasingly abrasive and bordering hostile towards employment pass holders who actively contribute to the Singapore economy, society and fiscus. We hope this will ease as economic conditions improve.

It will lead to reciprocating rules and less opportunities for Singaporeans to work abroad

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While the company does not hire DP or LOC holders directly, we have a significant number of senior employees who are critical to the business who have partners on DPs or LOCs. The restrictions on DP and LOCs eligibility to work directly and negatively impacts the viability of the direct employee living in or moving to Singapore if they are unable to gain employment or run their own business (a business takes time to set up and is unlikely to be profitable enough to sustain a local hire in the immediate future). This is an immediate and high risk to the company losing key employees, and we would suggest the government consider redacting the amendment, or introducing exceptions.

The LOC was a backdoor. Now it is closed. Will use the front door.

For me personally this means no working in Singapore in the future, meaning no contributing Singapore by paying company taxes and personal income taxes.

I provide a service to expat children which is not so easily met by local personnel (speech and language therapy). Removing my one-person business will remove this service for expats and the loss of services like these may negatively impact the desirability of Singapore as a place to live for expats. This is in addition to the fact the new rules will discourage spouses from working here which will, without doubt, make them much less inclined to move here.

Whatever the solution, expatriate wives should not be unduly barred from working if they have found a job with no Singaporeans skills equivalent available locally.

The impact of the termination of LOC has different impacts on different organisations. We would need to include also and primarily international schools (language education), Foreign Institutes (e.g. Goethe Institut, Alliance Francaise, etc).

It especially affect high skilled that has the possibility to work part time and the part salary do not match the EP salary requirement especially for people older than 40 years old.

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Reconsideration of this decision appreciated.

Expatriates with spouses will find it difficult to consider a move to Singapore

Impact is huge on retail and f&b industries

Find a way to set quotas or similar process for application as EP (ie SG citizen search first) to enable LOCs. As really in the Year of the Woman in SG this is a HUGE blow to so many. Women now unable to work, run businesses and often filling gaps for roles which Singaporeans don't want to take up. Not what I expect from a so called first world country and a big step back for working women

Thanks for taking this up. Whether any one can do anything about it looking at the current situation? We are talking about DP here, when the future of EP's renewal and approval may itself be a challenge.

There should be another solution for part-time jobs and new business owners to work for smaller hours or salaries.

I have lost my job, my children's schooling is affected by this

How does it compare with other countries - any reciprocity with Switzerland / Europe ? Are spouse even able to work if trailing ?

Families are not anymore welcome.

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The manner in which the Singapore Government treats the spouses of expatriate workers in Singapore by denying them the ability to operate independently of the main employment pass holder, including now the removal of LOCs and therefore the ability to work in flexible, part time and family friendly positions, has a hugely negative impact. The reality is this predominantly negatively affects women (who make up the majority of such dependants). This institutionalises patriarchy and leaves women and children vulnerable. The Singapore Government may feel that this policy will not negatively affect attracting 'high earners' in International companies to Singapore however these people do not come alone - more often than not they are part of a family unit and by stripping the rights of the spouse and making it less attractive for her to live in Singapore, by preventing her from working, this makes it less attractive for the whole family. Alongside other inherently sexist and female value-stripping policies such as only the EP holder's can apply for a LTVP for his parents and not his spouse's (indeed the fact that DP cannot apply for herself - presumably on the basis that the EPs income is seen as only his belonging to the EP holder and not viewed as family income) makes Singapore a very uncomfortable place for modern women to live. Removing their option to work in flexible, family supporting roles only makes this more so.

Given the relatively low taxation requirements in Singapore I feel that changes in taxation of LOC holders could have been an alternative option, whilst still allowing DP's to earn a living

To recruit the best people we need to make their wife's/husband happy otherwise they will not come anymore and the current ones might move out

Since spouse is only hired in the company, not allowing LOC does not create new jobs for Singaporeans in our case. All it does it helping to shut down a company generating business and income in Singapore.

Singapore is about to risk the reputation as foreign company friendly location. New companies might go for alternatives in ASEAN. Very bad signals to foreigners and Ex-Pats during the time of the general elections in 2020 and with this new LOC rule.

With the change of the new legislation, there will be more dependency on the pass holders. I foresee a hike in requests for more pay from pass holders or a tendency to go for a better paying company since there's one lesser contribution in the household. This will create talent attraction/retention issues within an organisation.

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To be fair, it is standard in other countries that a dependent also needs a full work permit in order to work

I find a blanket rule change like this to be short sighted. Small businesses and large corporations should not be treated the same. Also specialist jobs where it is very difficult to find employees should be considered. Such as some healthcare industries. It is very unfortunate timing with many foreigners on DP's missing funerals at home, sick parents and their own financial hardship because of Covid-19. Many of these people on LOC'a are women, which is timely with this weeks woman's day celebrations. A full time vs part time salary should also be considered as woman wish to return to work part time after having a baby. Perhaps the same fair employment expectations that are carried out for a EP application can be applied to an LOC application also? Rather than abolishing it entirely?

This change really makes you think that maybe it is time to leave Singapore

I wish they would change this new legislation back to what it used to be.

While we do not employ a number LOC candidates, it will likely impact our current expat population and their spouse's potential job opportunities in Singapore. This is already a concern for our expatriate population.

I have 8 people on LOC'S. Their job is to read and analyse Danish news. This means I can only employ Danish speakers. I employ accompanying spouses as part-time staff for this task, and the new legislation means I have to move these jobs out of Singapore

The (international) not for profit organisations in Singapore are hit disproportionately - this will have a negative effect to the Singapore society as well. The continuity of non profit organisation are at stake.

In my experience many, if not the majority, of jobs done by people on LOCs will not be replaced by Singapore citizens and/or PRs. If that is the reason behind the policy, I feel it is a flawed one.

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Many of the LOC jobs require require specific language skills which are not readily available in the Singapore core workforce. In addition, they are also often part time, which mean that they do not meet the salary requirements for EPs, as the requirements are not prorated for part time workers.

I would not have moved to Singapore if I knew it meant completely giving up my career. It really feels like I'm not welcome in this country.

This feels like Singapore wants to reduce the number of expats and foreigners working here.

Abolishing the LOC possibility appears to be another step in aiming at strengthening the Singaporean core in companies here in Singapore. It is to be hoped that the Government will recognise foreigners that no longer are eligible for LOC, but have appropriate skillsets and track record, and to approve an EP for them, so they can contribute to business in Singapore.

The more the restrictions imposed on foreigners the less attractive Singapore becomes for international investment

Allow easier access to EP or S Pass to qualified spouse who currently are not allowed to work for either non recognition of diploma or low income. Their income should be added to the EP holder income and not looked at alone.

Most Scandinavian couple have work and expatriate to Singapore means one have most likely have to give up their career for the period. LOC created a simple and low level entry to part time jobs for dependent expatriate once family was established in Singapore. By taking this away, we will have issue to get the talents to come to Singapore. This will make Singapore a less attractive location for their Asian companies.

Will there be any exemption for people who cannot realistically be replaced with a local hire, e.g. someone working at the Swedish school if they are on an LOC, or someone who has started a one-person business (for which they obviously cannot replace themselves with a local hire)?

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For European couples it is very normal that both partners work. If a couple gets an opportunity to move to Singapore for the work of one of them, there has to be enough certainty that both of them can find a job. Even if that is only a part-time job (which will not be approved for an EP because of the salary requirements). Companies will also consider to relocate their headquarters out of Singapore if they can't bring the foreign employees into Singapore. A lot of the jobs now taken by people on LOCs can not just be taken over by Singaporeans, because of language/skills/etc. In my case, we would not have moved to Singapore if we knew beforehand it would be very hard for me to find a job. Especially since we are here only for a short term, it should not be too hard to find a (temporary) job. It already takes a long time for MOM to approve EPs.

We request MOM to allow return of Employees who are stuck outside Singapore immediately as my wife is still in Singapore, working on LOC and my work pass need to be renewed.

In relation to this topic and as (joined) association(s) it would be helpful to:

- drive a discussion with the authorities & EDB about what is required for Singapore to remain competitive. It means for sure in the maritime and port industry that continued access to flexible, diverse and foreign talent is a major opportunity to achieve success competing against the region and to in parallel develop the local workforce. There is politically more at stake than jobs for Singaporeans, where obviously the DP model should not be unfair against local qualified workers. Maybe there are middle ways catering for more interests.
- visualize not only the economical impact of the 11k DP's but to include their spouses to the equation. Forward looking a simulation could be made about spouses not accepting to come to Singapore with their partner or employers required to manage this new potential hardship at a cost.
- appeal if no changes, for a phasing of the measures to give existing expats time to adjust and to create time to prepare local people for the job that remain.
- since our business in Singapore is considerable (approx 20% of global results), relocating our regional office for Asia and Middle East also based here to another location is not likely, but I can see a different assessment for companies with a small footprint here. In line with point 1 sure a group of associations can create some pain there to drive also this discussion.

The new regulations have been implemented as LOC leads to a 'grey' area for work passes. I feel MOM is trying to streamline the Pass applications, unfortunately as LOCs consists of the smallest percentage amongst the respective Pass selections with the least impact as a whole.

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Many LOC's are used to employ teachers in language schools, which A) can't be replaced with Singaporeans, B) are not full-time jobs and C) affects Singaporeans' opportunities to learn other languages negatively. Also, a majority of LOC's holders are women who find a way to contribute to society by finding part-time work or starting their own businesses. To tell these women that their contributions don't matter and that they should stay at home and look after the house and children surely can't be the government's view on women in 2021, the year of the SG woman? Only a fraction of positions that are today occupied by LOC holders would go to Singaporeans, but the impact on the current LOC holders is tremendous. At least exemptions should be given to language schools as well as start-ups for a period of time as this would benefit society as a whole.

The changes in law not only have impact on my business but affect me personally where my spouse is affected and her PTE LTD company will most likely will have to shut down as she will not be capable of meeting the criteria to switch to a Work Pass contributor as this would collapse her whole business. Should this be the case then we will not extend my main Employment Pass in Singapore and move the regional hub of our company to another country.

This is a diversity and gender issue. To my knowledge, the bulk of people on LOCs are women; trailing spouses. They are simply trying to contribute to society, stay relevant, earn a small additional income - and stay sane. The new regulation makes women more dependent, with a risk of increased domestic abuse or simply hardship for trailing spouses, according to Aware Singapore, who deals with abuse, and regularly has trailing spouses turn to them in desperation.

I've lived here for nearly 22 years (have been a PR for over 19 so not personally affected) & love the country. But I worry about it is descent from a visionary open market minded mindset to a protectionist one. I see this change as extremely petty & shortsighted.

Singapore is now reducing the ability of companies to operate with foreign employees. We may be forced to relocate large parts of our operation. This is having a negative impact on Singapore's position as a Global or Regional Hub.

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This legislation pretty much forces spouses on a DP to stay at home and not work as they won't meet the criteria, while they usually would be more than happy to work part-time or start something on their own.

While hiring people, look beyond what qualifications or certifications they hold and instead look deeper into what experiences and perspectives they can bring .

There should be a category created for essentially self-employed single employee or <5 employee micro employers to enable LOCs or a category of WP that does not have the prohibitive salary requirements of the proposed legislation on those fully qualified professionals who want to set up businesses and contribute to society through taxes and business contracts that hire the services of other firms utilising Singaporean talent, but who do not necessarily qualify for the Employment pass as they will only ever seek to be micro businesses, or do not qualify for the salary stipulations of age / professional level of qualification due to nature industry sector, working time.

I understand that it is unfair that MNCs can circumvent the EP/WP and quota system by employing spouses on LOCs and that may harder to justify but this will also affect cottage businesses, SMEs, schools, medical clinics etc etc.

In addition, if my wife cannot work in Singapore so will feel under valued and will ultimately push for us to return home: the common idea that expat wives want to play tennis and have lunch is absurd and totally out of touch with reality.

Further, when one of my team's Singaporean husband transferred to the UK for 18 months she (also Singaporean) was immediately issued a dependent work pass. If Singapore does this, I hope countries like Ireland and the UK reciprocate.

Like a lot of people that we know in Singapore , we choose to come here for some time because I was able to work. With this new law a lot of couple will not choose Singapore because women or husband want to work, not just for economic reasons also because they want to keep an intellectual activity. Also most of the Singaporeans do not want this job (architect, video game sector, etc ...or can not (language issue , culture issue ...)

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Start ups should be viewed differently vs a large corporate company hiring via LOC. Spouses of EP holders contribute greatly to the entrepreneurial spirit of Singapore and without the ability of talented spouses on DP's to work for themselves, the viability of families living in Singapore under an EP becomes questionable

Negative international publicity of Singapore becoming more nationalist. Potentially bringing quid for pro approach from other countries towards Singaporeans abroad.

The removal of LOC holders will remove skilled professionals, mainly woman , who contribute to Singapore work force for both foreigners and Singaporeans. These are people with degrees who want to work but are on a commission basis and do not qualify for EP status. It a blow for these families both financially and psychologically.

Everyone economy requires a mix of high, middle and low income earners. While not all foreigners coming to Singapore are high income, they bring other skills, languages and experiences that contribute to making Singapore a truly global city. Dependents who have moved to Singapore along with their spouses is a good source of foreign labour for Singapore and contributes to Singapore functioning as a global city. Many a times these dependents do not wish to work full time hence the LOC has been a very useful system to tap their talents which then benefits Singapore. Subjecting them to quotas just reduces labour market flexibility and the range of specialised skills available to Singapore. This is written from the view of a Singapore citizen who owns and operates multiple business concerns outside of Singapore.

The LOC is a 'grey area' pass loophole that should not have been created. It complicates matters and now to just do away with it in such a short time is terribly unfair to both companies and individuals who have employed those on a LOC.

A handful of not-for-profit organisations, that offer part-time language training as a CCA for their kids, will suffer. None of these can afford to pay normal salaries, and some of them have existed in Singapore almost for as long as Singapore has been in existence. I am hoping for a category being developed just for them, open to DPs, for CCA-related or CCA-similar language training. I doubt it is possible, but one can hope that a way forward can be found.

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There is a public perception that foreigners take jobs from Singaporeans, and certain nationalities' behaviour may have enhanced that perception. However, it is an economic fallacy and any economics professor will confirm that.

All current LOC could be offered an automatic transfer to an EP without EP hurdles - one for one exchange. A clear ABC process of how to do on the MOM website / sent to all LOC holders / employers would be helpful. It would be helpful if LOC holders could transition to an EP anytime from now until their LOC expires.

This will disproportionately affect women unfortunately and Singapore's reputation with regards to gender parity

It is not a good solution to reduce unemployment in SG... LOC are for jobs that Singaporean wouldn't take. Entrepreneurs with LOC contribute to Singapore's economy. It is not good to force them to stop. Attractively for startups will be reduced

If this regulation is to prevent employers are underpaying foreigners and by doing so exclude local employees, can we first assess out of 11k LOC holders where and to what extent this is the case? The cure seems somewhat harder than the disease itself, in my view.

The end of LOC will not change the perception of many in Singapore towards foreigners. So, is this measure effective? NGO could indeed turn to S-Pass but they will most probably have a quota issue.

It's extremely limiting to continue living in SG when families rely on 2 incomes