

SINGAPORE

INTERNATIONAL INTELLECTUAL PROPERTY ALLIANCE (IIPA)

2026 SPECIAL 301 REPORT ON COPYRIGHT PROTECTION AND ENFORCEMENT

Special 301 Recommendation: IIPA recommends that Singapore be placed on the Watch List in 2026.¹

Executive Summary: While Singapore's Free Trade Agreement with the United States, which entered into force in 2005, resulted in important improvements in Singapore's copyright protection and enforcement regimes, the Government of Singapore should address several pressing concerns that threaten to undermine these gains achieved. In 2021, Singapore's government amended the Copyright Act, adopting a broad exception to copyright protections for purposes of text-and-data mining (TDM) for "computational data analysis." It is critical that any application of the TDM exception is done in a manner consistent with Singapore's international obligations. To date, the Government of Singapore has yet to provide rights holders further clarity around the application of the TDM exception. Further, the Government of Singapore should remove or significantly narrow the exception for the indirect public performance of sound recordings consistent with Singapore's international obligations. This exception allows users to evade paying equitable remuneration to rights holders if the content is received through a television or broadcast (including by radio) or a cable program. Lastly, Singapore's enforcement authorities should take more effective actions against unlawful illicit streaming devices (ISDs) and piracy syndicates located in Singapore, both of which threaten legitimate markets for copyrighted materials both in Singapore and around the world.

PRIORITY ACTIONS REQUESTED IN 2026

Enforcement

- Increase enforcement against unlawful ISDs, including by taking action against distributors that sell non-preloaded devices while providing instructions or assistance to load infringing applications, and piracy syndicates.

Legal Reforms

- Conduct a review to ensure the broad exception for text-and-data mining is applied in a manner consistent with Singapore's international obligations.
- Remove or significantly narrow the exception for the indirect public performance of sound recordings consistent with Singapore's international obligations.

ENFORCEMENT

- **Increase enforcement against unlawful ISDs, including by taking action against distributors that sell non-preloaded devices while providing instructions or assistance to load infringing applications, and piracy syndicates.**

A major concern in Singapore is the proliferation of ISDs, including popular brands like *SVICloud*, *EVPad*, and *UnblockTech*. It is encouraging to see that the Singapore Police Force Intellectual Property Rights Branch has carried out regular enforcement action and raids against various distributors of ISDs in Singapore. Following raids in October 2022, two distributors of ISDs were prosecuted and sentenced before the Singapore Courts. The first was sentenced to ten months' imprisonment on October 24, 2024, with his two shops fined 200,000 SGD (~\$156,000) and 100,000 SGD (~\$78,000) respectively under the Singapore Copyright Act. The second was convicted of 17

¹ For more details on Singapore's Special 301 history, see previous years' reports, at <https://iipa.org/reports/reports-by-country/>. For the history of Singapore's Special 301 placement, see <https://www.iipa.org/files/uploads/2026/01/Appendix-C-FINAL-2026.pdf>.

charges and in May 2025 sentenced to six months' imprisonment and his company was fined 181,000 SGD (~\$141,307). A few cases remain pending before the Courts. These raids are typically initiated *ex officio* but supported by rights holders after the fact.

While raids against popular physical marketplaces in 2022 have had a deterrent effect against physical sales, distributors of ISDs have now moved to e-commerce platforms. That said, it is encouraging to see that actions have been taken against them as well. On June 23, 2025, the Singapore Police Force arrested two people for their alleged involvement in online sales of ISDs. More than 100 units of ISDs, including pirate brands such as *SVICloud*, *EVPad*, *UnblockTech*, were seized from two locations in Singapore.

A remaining concern is the sale of non-preloaded devices with instructions to install infringing apps. The Singapore Copyright Act was amended in 2021 to target retailers who attempt to circumvent liability by selling non-preloaded devices while providing instructions or assistance to load infringing applications. In particular, under Section 150(1) of the Singapore Copyright Act, it is an offense to traffic in a device or offer a service that is capable of facilitating access to an unauthorized copy of a copyrighted work. The seller must know or should reasonably know that the device or service is capable of facilitating access to unauthorized content and has only a limited commercially significant purpose or use other than that capability.

However, since the introduction of the provisions in 2021, no action has been taken against such non-preloaded boxes, creating a false perception of a loophole both with users and e-commerce platforms. Authorities must now actively enforce these existing laws and take action to deter those attempting to circumvent the laws through similar means, especially pirates who knowingly sell devices and/or offer services for the purpose of accessing pirated streaming content. A successful prosecution in a non-preloaded device case would serve as an important deterrent, sending a strong message that such tactics will not shield offenders from liability.

Separately, we commend the Singapore Police Force's proactivity in raising cybersecurity risks arising from the use of ISDs. On November 12, 2025, the Singapore Police Force and Cyber Security Agency of Singapore issued an "Advisory On The Dangers Of Non-Certified Streaming Devices", warning members of the public that accessing illegal streaming sites or downloading unofficial applications through non-certified streaming devices may expose users to malware that could compromise home networks and personal information. It would be helpful if the Singapore Police Force could also publish a non-exhaustive list of commonly encountered non-certified streaming devices to better inform consumers. This could include widely used pirate brands such as *SVICloud*, *EVPad*, and *UnblockTech*.

Additionally, while law enforcement action against distributors of ISDs is welcome, we encourage law enforcement to focus higher up the supply chain to target the ultimate manufacturers and distributors of these ISDs. Singapore's law enforcement officials should work collaboratively with international law enforcement, including regional partners, against such targets.

Another concern is that several piracy syndicates utilize Singapore-related presence (including corporate entities or shell companies or bank accounts) to carry out their criminal enterprises. Some piracy syndicates with a presence in Singapore make the deliberate choice to carry out infringing activities outside of Singapore to avoid enforcement within Singapore, but their Singapore-related activities, such as the recruitment of personnel to upload infringing content, often play a critical role within the criminal enterprise. Local law enforcement should take action against criminal syndicates who rely on corporate entities, bank accounts, or other Singapore-related presence as a means of reputation or money laundering and to legitimize their operations.

LEGAL REFORMS

- **Conduct a review to ensure the broad exception for TDM is applied in a manner consistent with Singapore's international obligations.**

In September 2021, Singapore's government passed and implemented an expansive TDM exception in the Copyright Act that permits copying or communicating for computational data analysis.² While Singapore's TDM exception requires the user to have lawful access to the work in question, it does not expressly distinguish between use for commercial or non-commercial purposes, does not expressly permit a contractual override, and is not clear what activities or which beneficiaries are encompassed by the "computational data analysis" limitation. It is imperative that any application of the TDM exception is done in a manner that is consistent with Singapore's international obligations.

- **Remove or significantly narrow the exception for the indirect public performance of sound recordings consistent with Singapore's international obligations.**

Singapore's public performance right includes a carve out for certain "indirect uses" of works or sound recordings, allowing users to evade paying equitable remuneration to rights holders if the content is received through a television or broadcast (including by radio) or a cable program. The exception is out of step with Article 15(1) of the WPPT (which Singapore has not limited in any way through Article 15(4) and therefore applies in full) and has already proven to be a contributing factor to lower than expected public performance collections in Singapore, which is expected to continue to the detriment of rights holders if the exception is not removed or narrowed significantly to serve its specific policy purpose.

² See Article 244 of Singapore's Copyright Act of 2021, available at <https://sso.agc.gov.sg/Acts-Supp/22-2021/Published/20211231?DocDate=20211007&ProvIds=P15-P28-&ViewType=Within&Phrase=computations&WiAI=1>