PMHAZE

a People's Movement to Stop Haze

Proposal to Strengthen the Transboundary Haze Pollution Act

How Singapore's Transboundary Haze Pollution Act can help prevent future fires and compensate people who suffer from haze

3 November 2026

Summary

In 2014, Singapore passed the Transboundary Haze Pollution Act (THPA). It is an extraordinary law that lets Singapore act against companies whose conduct abroad causes haze here, and gives anyone harmed the right to claim compensation. Yet in 12 years, no company has been fined or sued under it,[1] and four investigations commenced after the 2015 haze are still open.[2]

The 2026 haze may cost Singapore between S$3.2 billion and S$3.9 billion.[3] NEA has served notices on 20 companies, and Ministers have announced that NEA will be able to direct companies to appoint independent assessors, paid for by the companies. Companies are expected to give the assessors full access to information, documents, premises and people relating to their operations, corporate relationships and supply chains.[4]

We welcome these steps. They strengthen the initial investigation link in the chain, but do not reach the links that matter the most to the people harmed: using what investigations find, getting compensated, and companies facing consequences that match the harm caused. This proposal aims to address these gaps through legislative and operational mechanisms.

A survey of 781 Singapore residents commissioned by PM.Haze found that 92% did not know that they could claim compensation. Respondents were more likely to seek compensation if claims are made more accessible: increasing from 41% (likely to claim on their own if the haze-causing company is identified) to 66% (likely to join a group claim brought by a representative at no cost and needing only basic evidence).[5] Survey results can be found in the Annex.

Our asks

1	**Make civil claims accessible and usable:** provide a simple route for civil claims once a company is convicted.
2	**Act on shorter bursts of dense haze:** not only after 24 hours at PSI 101 or more.
3	**Make Singapore-based parent companies disclose their group and answer for it:** land-holding subsidiaries and affiliates, suppliers and beneficial owners, updated and public, with a presumption that the parent takes part in management.
4	**Finish investigations:** set timelines, allocate resources and provide regular public reports.
5	**Make the consequences match the harm:** remove the S$2 million cap and raise the daily fine, use fines for relief first, and hold senior executives personally accountable.
6	**Hold companies based in Singapore accountable wherever their fires cause haze:** expand the Act to cover haze abroad caused by companies incorporated here.
7	**Include conduct that creates fire risk,** set fire prevention standards and make illegal peat drainage an offence.

[1] Eco-Business, 'This year's haze is set to cost Singapore more than 2015's S$1.83 billion. Who pays for the losses?', 16 October 2026.

[2] The Straits Times, 'Unhealthy air quality in S'pore sufficient to trigger haze pollution law; NEA monitoring situation', 12 October 2026.

[3] Eco-Business, n 1.

[4] Bernama, 'Singapore eyes stronger transboundary haze law to address enforcement gaps', 27 October 2026; AsiaOne, 'Singapore names King's Counsel, 6 firms to probe companies linked to haze', 30 October 2026; The Straits Times, 'Leaders of firms probed for haze links called for meeting with S'pore ministers, warned to cooperate', 28 October 2026.

[5] PM.Haze survey of 781 respondents in Singapore (citizens, permanent residents and pass holders, screened to only consider respondents reporting haze-related costs), conducted by Apeiron Market Research & Consulting from 21 to 31 October 2026. Respondents were recruited online, through a dedicated online platform, social media channels and during the town hall.

Where things stand

How the Act works today

The Act applies to any company, whether based in Singapore or overseas, that causes or contributes to haze pollution in Singapore.[6] It can only be used when the air is unhealthy for long enough: a 24-hour PSI of 101 or more in any part of Singapore, lasting at least 24 hours.[7] The law also has presumptions that shift the burden of proof to the companies, for example, if smoke haze from a fire is shown heading to Singapore during a haze episode, the landholder and its managing or controlling company are presumed responsible.

- **Statutory penalties:** A company that causes, contributes to or allows a fire on land it owns or occupies can be fined up to S$100,000 a day, capped at S$2 million in total.
- **Civil liabilities:** Anyone in Singapore harmed by the haze, a person or a business, can sue for illness, property damage or economic loss, with no cap.

The record so far

After the 2015 haze, NEA served notices on six companies. Four of those investigations are still open after 11 years, and no fines have been imposed.[8] This year NEA has served notices on 10 Indonesian and 10 Singapore-registered companies.[9] As far as we know, no one has filed a civil claim under the Act.[10]

What the Government has announced (as of 2 November 2026)

Ministers set out a new assessor process and said amendments to THPA would be tabled.[11] As announced:

- NEA will be able to direct any company suspected of links to the fires to appoint independent assessors, paid for by the company.
- Assessors will have full access to documents, information and sites, and will examine operations, corporate relationships and supply chains.
- Assessors will report their findings to NEA.

The Minister for Sustainability and the Environment has said the aim is to close gaps in enforcement, make companies more accountable and strengthen investigations.[12]

Ask 1: Make civil claims accessible and usable

Senior Minister K Shanmugam has said that Singapore will use "every legal and regulatory lever" at its disposal against companies that refuse to cooperate,[13] and that the Government will "pursue all

[6] Singapore Statutes Online, Transboundary Haze Pollution Act 2014 (2020 Revised Edition).

[7] The Straits Times, 'Unhealthy air quality in S'pore…', n 2; Singapore Statutes Online, Transboundary Haze Pollution (Air Quality) Regulations 2014, 25 September 2014.

[8] The Straits Times, 'Unhealthy air quality in S'pore…', n 2.

[9] Bernama, n 4.

[10] Eco-Business, n 1.

[11] The Straits Times, 'Leaders of firms probed for haze links…', n 4; AsiaOne, 'Singapore names King's Counsel…', n 4; Parliament of Singapore, Order Paper No. 40, 3 November 2026.

[12] AsiaOne, 'Singapore aims to strengthen haze law, may introduce new legislation where necessary: Grace Fu', 27 October 2026.

[13] AsiaOne, '"They cannot play hide and seek": Shanmugam warns haze-linked firms as scrutiny widens over Indonesian fires', 19 October 2026.

available legal and regulatory avenues" to hold those responsible to account.[14] The Act's civil provisions are one of those levers. They should be made usable and put to use, both as a deterrent and to give people who have suffered from the haze the means to seek compensation.

Currently, there are practical challenges that prevent people from using THPA's civil provisions:

- **The evidence is difficult for individuals to gather.** Proving which company's fire caused the haze takes concession maps, fire data and company records from abroad. Even the Government finds such evidence hard to gather and verify.[15] It is not possible for an individual person or business to obtain such evidence. In our survey, nearly half (47%) of respondents not likely to claim on their own indicated that one of the reasons was that they were unsure whether they would win.[16]
- **A claim costs more than it recovers.** Most individual losses are small next to the cost of a court case. Of the survey respondents, 76% lost less than S$500 in total, and two-thirds of those not likely to claim on their own cited legal costs, time and effort.[17]
- **Direct health harm is hard to prove.** Each claimant must link their own illness to the haze, when the haze is rarely the only cause and more often worsens an existing condition. In our survey, 39% of respondents paid for a doctor's consultation or medication because of the haze.[18]
- **Few people know the right exists,** and fewer know what records to keep. In our survey, 92% of respondents did not know they could make a civil claim under the Act, and 39% had never heard of it. Of those not likely to claim on their own, 43% did not know how to make a claim and 37% did not have enough records of their losses.[19]
- **Payment is uncertain.** A plantation company may have no assets in Singapore, making enforcement difficult.

What we heard

At a town hall on 25 October 2026, co-organised by PM.Haze and SG Climate Rally, attendees described flare-ups of eczema and asthma, sore eyes, and spending on air purifiers and air-conditioning. On claims and accountability, they raised the following points:

- Individuals should not have to gather evidence on concessions and companies abroad. The Government holds the data and should use it on the public's behalf.
- People want to know who owns the companies linked to fires, and who profits from them.
- Migrant and outdoor workers have few places to turn, and lost work hits families who depend on them.
- Those who **cannot afford to escape the haze** are also the ones whose health suffers the most, and incur financial loss due to medical bills.
- Investigation outcomes affect how companies are financed, so they should be made public.
- Senior executives should be held personally responsible.

[14] Ministry of Home Affairs, 'Transcript of media doorstop by Mr K Shanmugam after meeting with companies issued S10 notices under the Transboundary Haze Pollution Act', 28 October 2026.

[15] AsiaOne, 'Singapore aims to strengthen haze law…', n 12.

[16] PM.Haze survey, n 5.

[17] PM.Haze survey, n 5.

[18] PM.Haze survey, n 5.

[19] PM.Haze survey, n 5.

What we propose

1.1 A simple claims route once a company is convicted. When a court convicts a company under the Act, people and businesses harmed during the haze episodes covered by the conviction should be able to claim from it through a simple process. For example, the Government can either appoint a public body that claims on behalf of affected residents, or implement a compensation scheme that pays people on simple proof and then recovers the cost from the companies responsible. Claimants should only be required to show that they were affected during the haze and what it cost them, using everyday records such as receipts, medical certificates and sales figures. In 2025, the Monetary Authority of Singapore (MAS) proposed a similar mechanism to appoint a designated representative for retail investor claims to address key hurdles including limited know-how and resources to coordinate efforts and a lack of funding. MAS will also consider establishing a grant scheme to co-fund strong cases.[20]

Our survey suggests such a route would change behaviour. Only 41% of respondents were likely to claim on their own, but 66% were likely to join a group claim brought on their behalf at no cost to them, needing only basic evidence such as receipts or a doctor's note. About half (49%) of those not likely to claim on their own would join such a group claim. Willingness to claim alone fell to 29% among those who lost less than S$50, while willingness to join a group claim stayed between 62% and 75% at every level of loss.[21]

1.2 Publish findings, so that they can be used. In 2015, the Government said it would share investigation results with the public, citing the Act's right to claim.[22] Eleven years later, NEA says it cannot share details because the cases remain open.[23] Findings from investigations and from the new assessor reports should be published when each case closes, with the company's response, and should count as evidence in claims.

1.3 Make health harm simpler to prove. For common, medically recorded conditions, such as a doctor's visit for a breathing problem during a haze episode, set standard amounts that people can claim without expert medical evidence. This matters most for people with conditions that are commonly known to be exacerbated by poor air quality, such as asthma and other chronic respiratory conditions.

1.4 Reach the company that can pay. See Ask 3.

1.5 Improve awareness of THPA's civil claims. Publish plain language guidance on who can claim, what losses count and what records to keep. Work with organisations serving vulnerable groups, migrant worker groups and community organisations to spread awareness to those who need it most. Awareness is associated with willingness to claim: in our survey, 30% of respondents who had never heard of the Act were likely to claim on their own, compared with 54% of those who already knew they could claim.[24]

Ask 2: Act on shorter bursts of dense haze

Today the law can only be used after a 24-hour PSI of 101 or more lasts at least 24 hours. However, a few hours of dense haze can still send someone with asthma to hospital, cancel an event, or empty

[20] International Bar Association, 'Recent developments and pending legislation relating to representative group litigation in Singapore', 29 April 2026.

[21] PM.Haze survey, n 5.

[22] Ministry of the Environment and Water Resources, via National Archives of Singapore, 'Singapore sends notices to four Indonesian companies', 25 September 2015.

[23] The Straits Times, 'Unhealthy air quality in S'pore…', n 2.

[24] PM.Haze survey, n 5.

a hawker centre. We ask the Government to add a measure for short, intense episodes, for example based on hourly PM2.5 readings or unhealthy hours added up over several days.

Ask 3: Make Singapore-based parent companies disclose their group and answer for it

Plantation land is often held through layers of subsidiaries and affiliates, which makes it hard to show who controls the land that burned and who profits from it. Senior Minister K Shanmugam has said that corporate structures and third-party arrangements must not stand in the way of establishing the facts.[25] Attendees at our town hall also wanted to know who owns the companies linked to fires, and who profits from them. A plantation company abroad may have no assets in Singapore, while its parent here does. Singapore can require companies incorporated here to disclose their ownership structure. The Act already presumes that a company participating in the management of the plantation company is also responsible, but it may be difficult to prove that participation, without records of actual involvement in its operations or control over its decisions on the land.[26] We ask the Government to:

- Require companies incorporated in Singapore that are part of the agribusiness sector, such as those whose groups hold, manage or buy from plantation or pulpwood concessions, to disclose (a) their subsidiaries, and affiliates under common ownership or control, that hold or manage land; (b) their suppliers of plantation and pulpwood products; and (c) their ultimate beneficial owners;
- Require these disclosures to be updated regularly, for example every year and whenever ownership or control changes;
- Make the disclosures public, so that investigators, financiers, buyers and people harmed by haze can trace responsibility; and
- Presume that a Singapore-based parent company takes part in managing a plantation company abroad that it controls, for example by owning most of it, appointing most of its board or procuring most of its supply, unless the parent shows otherwise.

Ask 4: Finish investigations

Investigations should not carry on indefinitely, as it signals to haze-causing companies that there will be no consequences. We ask the Government to:

- Set target timelines for investigations, and resource them to meet those timelines;
- Report to Parliament every year on haze episodes, notices and directions issued, investigations opened and closed, and outcomes;
- Explain to Parliament, each year, any investigation still open after two years; and
- Publish the findings when cases close.

Ask 5: Make the consequences match the harm

The maximum fine of S$2 million is reached after 20 days of haze, and is negligible compared with the economic losses suffered by Singapore.[27] We ask the Government to:

- **Remove the cap, and raise the daily fine** to a level that deters companies from causing haze;

[25] The Straits Times, 'Leaders of firms probed for haze links…', n 4. Full results are in the Annex.

[26] Transboundary Haze Pollution Act 2014, n 6.

[27] Eco-Business, n 1.

- **Use fines for relief to vulnerable groups here,** then for long-term fire prevention such as peatland restoration; and
- **Hold senior executives personally accountable.** Fine and jail executives who allowed burning, and make senior executives responsible for their group's fire prevention measures. For example, the Sarbanes-Oxley Act of 2002, which the United States passed after the Enron scandal, requires a public company's chief executive and chief financial officer to certify its financial reports and take responsibility for its internal controls, and imposes criminal penalties for knowingly false certification.[28]

Ask 6: Hold companies based in Singapore accountable wherever their fires cause haze

If a company based here is responsible for fires but the haze does not reach Singapore, it faces no consequences under the Act. This can result in complacency as companies may think, even after a successful conviction for the 2026 haze, that this is an immaterial one-off or once-in-a-decade issue. Expand the Act to include haze episodes abroad caused by Singapore-based companies. Singapore already prosecutes its citizens for corruption committed abroad,[29] and a similar principle could apply to companies incorporated here.

Ask 7: Include conduct that creates fire risk

When peat is drained, it dries out and becomes fuel for fire. Pantau Gambut estimates that 16.4 million of Indonesia's 24.2 million hectares of peat landscape are in fire-prone condition.[30] A Preventive Measures Notice comes only after a fire has started and haze has reached Singapore[31], and it is known that peat fires are almost impossible to extinguish without the rain. We ask the Government to:

- Set minimum fire prevention standards, such as patrols, detection, trained crews and peat water levels, and build them into the planned regular assessor evaluations; and
- Make draining peatlands in breach of the source country's regulations an offence under the Act.

Beyond this paper

We urge the Government to use its chairmanship of ASEAN from 2027 to push for regional action, which sits under the ASEAN Agreement on Transboundary Haze Pollution (AATHP) and is outside the scope of the THPA. As chair, Singapore should work with other ASEAN members, through the Agreement, to:

- Set an objective threshold or framework for providing firefighting support, so that help can be provided in a timely manner instead of upon request;
- Create a regional tribunal to jointly investigate and prosecute companies;
- Share concession, hotspot and enforcement data publicly; and
- Penalise companies that create dry conditions for fires, such as illegal draining of peatlands.

[28] Sarbanes-Oxley Act of 2002, Pub. L. 107-204, ss 302 and 906.

[29] Corrupt Practices Investigation Bureau, 'Custodial sentence and penalties for committing corruption overseas'.

[30] Greenpeace Malaysia, 'Malaysian and Singaporean in top 20 entities linked to fires in Indonesia', 5 October 2026.

[31] Transboundary Haze Pollution Act 2014, n 6.

Annex: Survey results

This annex sets out the full results of the PM.Haze survey described in footnote 5. Percentages may not add up to 100 because of rounding. Q3 and Q7 allowed more than one answer, so their percentages do not add up to 100.

Q1. What is your residency status in Singapore? (n = 781)

Answer	Respondents	%
Singapore Citizen	632	80.9
Singapore Permanent Resident (PR)	98	12.5
Employment Pass	41	5.2
Other: Dependent Pass	8	1.0
Other: Student Pass	2	0.3
Total	**781**	**100.0**

Q2. Which of the following age groups do you belong to? (n = 781)

Answer	Respondents	%
Under 18 years old	7	0.9
18–24 years old	72	9.2
25–34 years old	216	27.7
35–44 years old	254	32.5
45–54 years old	139	17.8
55–64 years old	90	11.5
65 years old and above	3	0.4
Total	**781**	**100.0**

Q3. Haze-related costs or losses incurred (more than one answer allowed) (n = 781)

Answer	Respondents	%
Paid for a doctor's consultation or medication	308	39.4
Purchased masks	548	70.2
Purchased air purifiers or air filters	339	43.4
Lost money due to cancelled or changed plans (e.g. non-refundable bookings)	84	10.8
Lost income (e.g. fewer work shifts or customers, or cancelled jobs or bookings)	78	10.0
Others	51	6.5
No option selected	5	0.6

Q4. Approximately how much have you lost or spent in total as a result of the haze since 4 September 2026? Please include all relevant expenses and lost income. (n = 781)

Answer	Respondents	%
Less than S$50	196	25.1
S$50–S$99	162	20.7
S$100–S$499	236	30.2
S$500–S$999	81	10.4
S$1,000–S$4,999	38	4.9
S$5,000 or more	12	1.5
Not sure / Unable to estimate	56	7.2
Total	**781**	**100.0**

Q5. Before taking this survey, which of the following best describes your understanding of the Transboundary Haze Pollution Act (THPA) and the possibility of making a personal civil claim for compensation for losses caused by transboundary haze? (n = 781)

Answer	Respondents	%
I knew that people could make a civil claim for compensation under the THPA.	61	7.8
I had heard of the THPA, but did not know that people could make a civil claim for compensation under the Act.	415	53.1
I had not heard of the THPA.	305	39.1
Total	**781**	**100.0**

About the Transboundary Haze Pollution Act (THPA)

The THPA is a Singapore law passed in 2014. It applies to companies whose activities, in Singapore or overseas, cause or contribute to haze in Singapore. Under it, the Government can prosecute and fine these companies, and people and businesses in Singapore can take them to court for compensation.

What can an individual achieve under a civil claim:

Compensation for injury or illness, damage to property, or financial loss (such as extra spending or lost income) caused by the haze.

What a person making a claim needs to show:

Proof of the loss, such as receipts, invoices, cancelled bookings or medical records. Claims for illness need medical evidence linking it to the haze.

That the company's fires contributed to the haze. The law makes this easier: if satellite and weather data show smoke from a fire on land linked to the company moving towards Singapore during the haze, the court can presume a link unless the company proves otherwise. If the Government has identified the company for a specific haze episode, it may be possible to ride on this.

Practical points:

A claim means bringing a case in the Singapore courts, usually with a lawyer's help.

If the company has no assets in Singapore, collecting compensation after winning may be difficult.

The law has not yet been tested in court for civil claims.

Q6. Suppose the Singapore Government publicly identifies a company as having caused or contributed to this year's haze in Singapore. Based on your losses, how likely would you be to make a claim for compensation against that company? (n = 781)

Answer	Respondents	%
Very likely	131	16.8
Somewhat likely	193	24.7
Neither likely nor unlikely	127	16.3
Somewhat unlikely	139	17.8
Very unlikely	141	18.1
Not sure	50	6.4
Total	**781**	**100.0**

Q7. Reasons for not making a claim (asked of the 457 respondents who did not answer "Very likely" or "Somewhat likely" to Q6; more than one answer allowed; n = 457)

Answer	Respondents	%
I do not know how to make a claim	197	43.1
Legal costs, and time and effort required	307	67.2
I am unsure whether I would win the claim	215	47.0
I do not have sufficient records or evidence of my losses	168	36.8
I believe it is the Government's responsibility to take action, rather than mine	157	34.4
No option selected	1	0.2

Q8. Suppose you could join a group claim brought by a representative on behalf of everyone affected at no cost to you. You would only need to provide basic supporting evidence, such as receipts or a doctor's note. If the claim were successful, you would receive compensation for your losses. How likely would you be to join this group claim? (n = 781)

Answer	Respondents	%
Very likely	252	32.3
Somewhat likely	266	34.1
Neither likely nor unlikely	125	16.0
Somewhat unlikely	61	7.8
Very unlikely	46	5.9
Not sure	31	4.0
Total	**781**	**100.0**

About PM.Haze

PM.Haze (People's Movement to Stop Haze) is a Singapore-registered charity (UEN T16SS0125L) working to end transboundary haze. We support peatland restoration in Indonesia, and run outreach activities and public education on the haze issue. To discuss this paper or work with us, you may reach us at contact@pmhaze.org or visit pmhaze.org.