



### Research into sustainability opportunities for Singapore-based lawyers

#### **Background**

The Singapore Economic Development Board (EDB), Enterprise Singapore (EnterpriseSG), and the Ministry of Law (MinLaw) commissioned PwC Singapore (PwC) to independently identify and assess the opportunities in sustainability for Singapore-based lawyers in the next 5 years and 10 years.

### Scope of research

Over the course of August and October 2024, PwC interviewed 66 sustainability legal industry stakeholders consisting of 3 academics, 15 in-house counsels, 24 sustainability lawyers, and 24 business leaders to get their perspectives on megatrends shaping the sustainability market, value chain analysis on key trends PwC uncovered, and legal service opportunities for Singapore-based lawyers and law firms. The interviewees represented a cross section of industries (agriculture, aviation, banking and finance, building and construction, carbon markets, consulting engineering, energy, fashion, and legal services), providing nuances to their legal service needs driven by the sustainability trends. The preliminary findings of this report were presented to selected interviewees and representatives from sustainability working groups of the Law Society of Singapore (LawSoc) and the Singapore Corporate Counsel Association (SCCA).

PwC also conducted a focus group with the Institute of Singapore Chartered Accountants (ISCA) and LawSoc with participants across the professional services sector in the different sustainability value chains. The participants include law firms, advisory firms, and accounting firms. PwC also supplemented the primary research with secondary research to provide the estimates in this report. The methodology considers the demand drivers for each theme, the growth rate of these demand drivers, the type of legal service, and the time required to provide the legal service.

#### Note:

While the scope of the study is on sustainability opportunities, there is an intentional focus on environmental sustainability and governance. Reference to any social aspects will be made only where necessary or relevant. Furthermore, this study is not a strategy paper but instead to identify potential sustainability opportunities for lawyers in Singapore.



# Estimated value of sustainability legal work by Singapore-based lawyers in SG\$ million (S\$m), 2023



### Standalone sustainability legal work

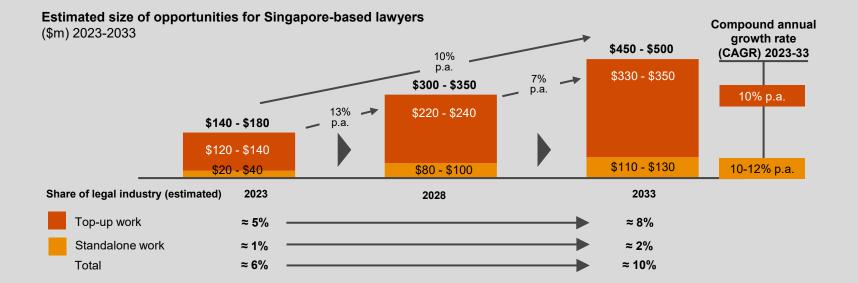
Refers to opportunities that have come by purely due to sustainability requirements and would not exist otherwise, such as:

- All legal work related to carbon markets.
- · All sustainability driven disputes (e.g. greenwashing).
- Reporting and compliance requirements driven by regulation and standards established by bodies, governments, and regulators.

### Top-up sustainability legal work

Refers to additional sustainability requirements and elements being introduced to existing legal work, such as:

- Drafting contract clauses to include sustainability requirements (e.g. Scope 1 or Scope 2 checks) to existing contracts.
- Additional sustainability due diligence as part of legal due diligence that are set out by investors / businesses / governments.



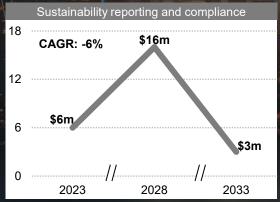
The market for sustainability legal work in Singapore is estimated to be between \$140 million and \$180 million in 2023. This market can be divided into two types of work:

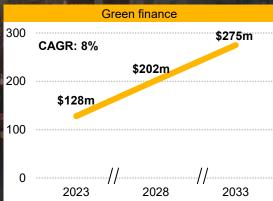
- Standalone sustainability legal work: \$20 million to \$40 million.
- Top-up sustainability legal work: \$120 million to \$140 million.

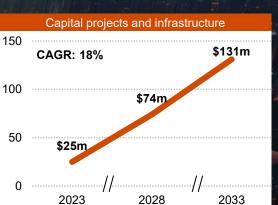
The sustainability legal services market is expected to grow significantly, with projections indicating a market size of \$450 million to \$500 million by 2033. This growth is driven by:

- Regulatory influence: Government regulations and mandatory targets are the primary drivers for sustainability adoption.
- Incentives and penalties: Various sectors have seen the introduction of regulations and incentives, employing both rewards (e.g. funding for meeting conditions) and penalties (e.g. fines for noncompliance).
- Singapore's sustainability track record: The Singapore government has been proactive in implementing sustainability regulations (e.g. Carbon Tax, Monetary Authority of Singapore (MAS) rules, Article 6).
- Role of Singapore lawyers: Lawyers in Singapore will remain influential in Southeast Asia as long as financing is routed through the country.
- Voluntary adoption: Voluntary sustainability targets drive demand, noting that these are sensitive to economic peaks and troughs, despite potential reputational benefits.

# Estimated value of sustainability legal work for Singapore lawyers by opportunities in SG\$ million (S\$m), 2023







## Market drivers for sustainability reporting and compliance:

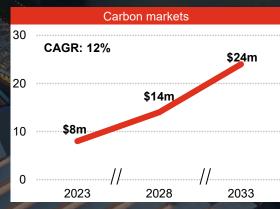
Regulatory requirements such as the Corporate Sustainability Reporting Directive (CSRD) and SGX-ACRA's climate-related disclosure.

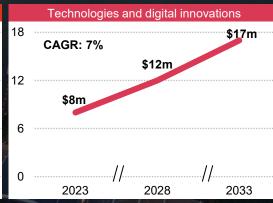
#### Market drivers for green finance: MAS regulations, sustainable debt, and investment funds integrating sustainability

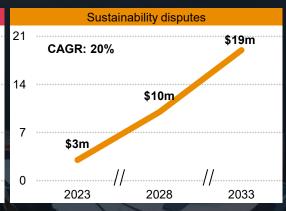
considerations.

## Market drivers for capital projects and infrastructure:

Southeast Asia's renewable energy goals and Singapore's role as an infrastructure financing hub.







#### Market drivers for carbon markets:

Regulatory push, increasing project investment, and growth of local carbon services ecosystem.

### Market drivers for technologies and digital innovations:

Private funding, government initiatives, and regulation.

### Market drivers for capital projects and infrastructure:

Increasing sustainability-related business activities, rising regulatory scrutiny, and Singapore's status as a global arbitration hub.

The sustainability trends are also shaping legal service opportunities in:

- Sustainability reporting and compliance: Estimated at S\$6 million in 2023, growing to S\$16 million by 2028 but expected to shrink to S\$3 million by 2033.
- Green finance: Estimated at S\$128 million in 2023, growing to S\$202 million by 2028 and S\$275 million by 2033.
- Capital projects and infrastructure: Estimated at S\$25 million in 2023, growing to S\$74 million by 2028 and S\$131 million by 2033.
- Carbon markets: Estimated at S\$8 million in 2023, growing to S\$14 million by 2028 and S\$24 million by 2033.
- Technology and digital innovations: Estimated at S\$8 million in 2023, growing to S\$12 million by 2028 and S\$17 million by 2033.
- Sustainability disputes: Estimated at S\$3 million in 2023, growing to S\$10 million by 2028 and S\$19 million by 2033.

Each of the key themes in sustainability are also creating different legal service opportunities in their respective value chains, such as:

- Sustainability reporting and compliance: Interpretation and advisory, legal review, and Scope 3 contracting work.
- Green finance: Bond issuance, fund structuring and operations, and legal due diligence.
- Capital projects and infrastructure: Regulatory guidance, contract management, risk mitigation, financial agreements, and structuring advice.
- Carbon markets: Legal due diligence, contractual work, compliance guidance, contract negotiation, carbon tax advisory, and compliance monitoring.
- Technology and digital innovations: intellectual property (IP) objection and response, IP strategy advisory, IP applications, and IP licensing agreements.
- Sustainability disputes: Issue identification, dispute resolution, and award enforcement.

# Opportunity for Singapore law firms to position for growth in green finance, capital projects, and green innovation in 2033

	\$270-280m Sustainability legal services market in 2033	\$130-140m Sustainability legal services market in 2033	\$14-24m Sustainability legal services market in 2033	\$13-23m Sustainability legal services market in 2033	\$20-28m Sustainability legal services market in 2033	\$3-5m Sustainability legal service market in 2033
Sustainability themes	Green finance	Capital projects and infrastructure	Technologies and digital innovations	Sustainability disputes	Carbon markets	Sustainability reporting and compliance
Need for new knowledge	Medium	Medium	Medium	High	High	High
Timeframe of opportunities	Short term (1 to 3 years)	Short term (1 to 3 years)	Short term (1 to 3 years)	Mid to long term (3 to 10 years)	Mid to long term (3 to 10 years)	Mid term (3 to 5 years)
Top-up or standalone legal service	Top-up sustainability legal work will drive growth	Top-up sustainability legal work will drive growth	Standalone sustainability work will drive growth	Standalone sustainability work will drive growth	Standalone sustainability work will drive growth	Standalone sustainability work will drive growth
Market drivers	<ul> <li>Growth of sustainable finance has been supported by MAS regulation.</li> <li>More than 50% of assets under management have integrated sustainability considerations.</li> </ul>	<ul> <li>Southeast Asia's renewable energy goals are boosting annual clean energy investments.</li> <li>Singapore plays an important role as the region's infrastructure financing hub.</li> </ul>	<ul> <li>Singapore has a high concentration of venture capital funds that invest in new technologies.</li> <li>Sustainability innovation is a key focus of Singapore's research and development efforts.</li> </ul>	<ul> <li>Rising regulatory scrutiny and growing stakeholder expectations are likely to increase disputes.</li> <li>Singapore's status as a key global arbitration hub will position for sustainability-related arbitration cases.</li> </ul>	<ul> <li>Regulators are establishing carbon markets.</li> <li>Carbon offset project investment in Southeast Asia is growing.</li> <li>Singapore is positioned to be the regional carbon service and trading hub.</li> </ul>	<ul> <li>The scope of sustainability reporting in Singapore is steadily broadening.</li> <li>Tighter European Union (EU) regulations on sustainable practices are enforcing global supply chain compliance, affecting companies in Singapore.</li> </ul>
Prioritising opportunities for Singapore lawyers <sup>1</sup>	1	2	3	4	5	6

1. Opportunities are prioritised based on market size and the timeframe of the opportunity. Technologies and digital innovation is ranked ahead of sustainability disputes and carbon markets because of the more immediate nature of the opportunity as well as greater certainty in market drivers. In addition, sustainability disputes rank ahead of carbon markets because of the greater uncertainty in factors that underpin the market (e.g. outlook of voluntary carbon markets in the region, as well as the establishment of standards for data transparency)

Immediate sustainability legal service opportunities for Singapore lawyers can be found in green finance, capital projects and infrastructure, and technologies and digital innovations. This is due to the combination of factors like size of market as well as the timeframe of the opportunities.

Combined with underlying factors and drivers that shape the market growth potential, it should be noted that these opportunities do not exist in isolation, and there will be other competitors in various markets attempting to seize them as well.

## Professional service opportunities for each value chain

Green finance	Capital projects and infrastructure	Technologies and digital innovations	Sustainability disputes	Carbon markets	Sustainability reporting and compliance
Non-legal sustainability related	l professional services <sup>1</sup>				
Sustainability strategy and risk management	Sustainability strategy and risk management	Sustainability strategy and risk management	Sustainability strategy and risk management	Sustainability strategy and risk management	Sustainability strategy and risk management
Stakeholder engagement and materiality analysis	Carbon and greenhouse gas management	Carbon and greenhouse gas management		Carbon and greenhouse gas management	Sustainability reporting and assurance
Climate risk and environmental impact analysis	Stakeholder engagement and materiality analysis	Stakeholder engagement and materiality analysis		Carbon credit advisory	Stakeholder engagement and materiality analysis
Internal and external communications	Climate risk and environmental impact analysis			Stakeholder engagement and materiality analysis	
Assurance and internal controls	Internal and external communications				
	Smart building solutions				/
	Assurance and internal controls				
Legal sustainability related pro	fessional services <sup>2</sup>			Contract of the second	
Bond issuance	Regulatory compliance	IP strategy	Arbitration	Legal due diligence	Interpretation and advisory
Fund structuring and operations	Contract management	IP applications and objections	Litigation	Contractual review and negotiation	Legal review
Legal due diligence	Financial agreements	IP enforcement		Compliance guidance and monitoring	Scope 3 contract review and negotiation
	Risk management	IP licensing agreements		Carbon tax advisory	

Industry interviews, company websites, Singapore Professional Services Partner Guide, PwC analysis
 Industry interviews, Singapore Professional Services Partner Guide, PwC analysis

## Potential for Singapore to be a leading regional sustainability legal hub

	Strategic goal 1	Strategic goal 2	Strategic goal 3
	Develop Singapore's sustainability legal service delivery capability	Develop Singapore into a Centre of Excellence for sustainability legal service in the region	Singapore to lead regional sustainability frameworks, standards development, and align with those of mature markets
What can law firms do?	<ul> <li>Invest in lawyers' continuing education and development in sustainability credentials through further education and professional certifications.</li> <li>Participate in industry cross-professions collaboration on sustainability topic (e.g. Sustainability Apex Programme¹).</li> <li>Develop cross-professions thought leadership perspectives on new developments.</li> <li>Identify potential cross-professions partnership for sustainability work (e.g. Ashurst and Aurecon alliance²).</li> </ul>	<ul> <li>Proactively engage with clients and prospects about new developments in regulation and standards to capture new work especially for clients with regional focus.</li> <li>Develop law firm brand strategy for sustainability.</li> <li>Present thought leadership at seminars and conferences.</li> <li>Write and publish thought leadership papers at journals and media.</li> <li>Develop proactive approach to sharing up-to-date newsletters on developments.</li> </ul>	<ul> <li>Participate in industry consultations on clause and template development for standard setting.</li> <li>Encourage clients and law firms from other jurisdiction to adopt similar templates and frameworks.</li> </ul>
What can lawyers do?	<ul> <li>Complete certification programmes and courses that offer specialised knowledge in sustainability. These programmes can provide a solid foundation and up-to-date insights, ensuring that lawyers are well-equipped to advise clients on complex sustainability issues.</li> <li>Keep up-to-date with developments through research papers from think tanks and universities.</li> <li>Collaborate with technical experts on white papers.</li> <li>Participate in secondment opportunities on sustainability legal matters (e.g. Ministry of Law and Law Society of Singapore's Legal Secondment Programme<sup>3</sup>) as well as secondment opportunities with organisations that are at the forefront of sustainability initiatives who can provide hands-on experience.</li> </ul>	<ul> <li>Participate in industry engagement sessions with trade associations and chambers from hard-to-abate industries. These engagement opportunities will shed light on how the industries can leverage legal service providers to better prepare for new regulations and standards developed.</li> <li>Work across professions to develop thought leadership perspectives on new developments.</li> </ul>	Participate in industry consultations on clause and template development for standard setting.

<sup>1.</sup> Enterprise Singapore. "Sustainability Apex Programme." Enterprise Singapore, Accessed 19 March 2025. <a href="https://www.enterprisesg.gov.sg/grow-your-business/boost-capabilities/sustainability/sustainability-apex-programme">https://www.enterprisesg.gov.sg/grow-your-business/boost-capabilities/sustainability/sustainability-apex-programme</a>
2. Aurecon. "Aurecon and Ashurst form industry first advisory alliance in response to business leaders' demand for complex risk solutions." Aurecon Group, 3 November 2021. <a href="https://www.aurecongroup.com/about/latest-news/2021/november/aurecon-ashurst-alliance">https://www.aurecongroup.com/about/latest-news/2021/november/aurecon-ashurst-alliance</a>
3. Ministry of Law. "Overview of Minlaw's Initiatives for 2022." Ministry of Law. 2022. <a href="https://www.mlaw.gov.sg/files/news/parliamentary-speeches/2022/1/Media Factsheet MinLaw COS 2022.pdf">https://www.aurecongroup.com/about/latest-news/2021/november/aurecon-ashurst-alliance</a>

## Critical success factors for building a leading legal sustainability practice to capitalise on market opportunities

#### **Expertise in sustainability legal domain**

Leading firms from across the globe have built successful sustainability legal practice by developing:

- · Knowledge of subject matter.
- · Internal training programs to educate practitioners.
- · Structured tracking of regulation and standards.
- Thought leadership that establish a point of view to share perspective.
- Sector-based knowledge through multidisciplinary teams.

#### Sustainability business acumen

Leading firms from across the globe have demonstrated business implications of sustainability by:

- Proactively engaging with clients and prospects about new developments in regulation and standards.
- Demonstrating practical application of knowledge of how the new developments would shape business decisions for clients.
- Being up-to-date with best practices in complying with new regulations and standards.

#### Global and cross-border expertise

Leading firms from across the globe have built successful sustainability legal practice by:

- Leveraging expertise and know-how from more mature markets like the EU.
- Cross-pollinating best practice and thought leadership content across the globe.
- Developing a hub and spoke approach for experts to be pulled into key pitches and services for key clients.
- Coordinating cross-border client engagements, leveraging key experts across the globe.

#### Sustainability practitioners' credentials

Leading firms from across the globe have built credentials of practitioners by:

- Developing a personal brand strategy for sustainability.
- Presenting thought leadership at seminars and conferences.
- Writing and publishing thought leadership papers in journals and media.
- Developing a proactive approach to sharing up-to-date newsletters on developments.

#### Industry-specific knowledge

Leading firms from across the globe have built industry-based approach to sustainability legal practice by:

- Developing deep understanding of industry-specific and business drivers that shape those key industries.
- Developing thought leadership content for key industries as new developments in regulation and standards emerge.
- Developing a multidisciplinary approach within the firm tailored to each key industry.

#### What Singapore law firms can consider doing

As Singapore law firms embark on the journey to develop a sustainability legal practice, it is critical to:

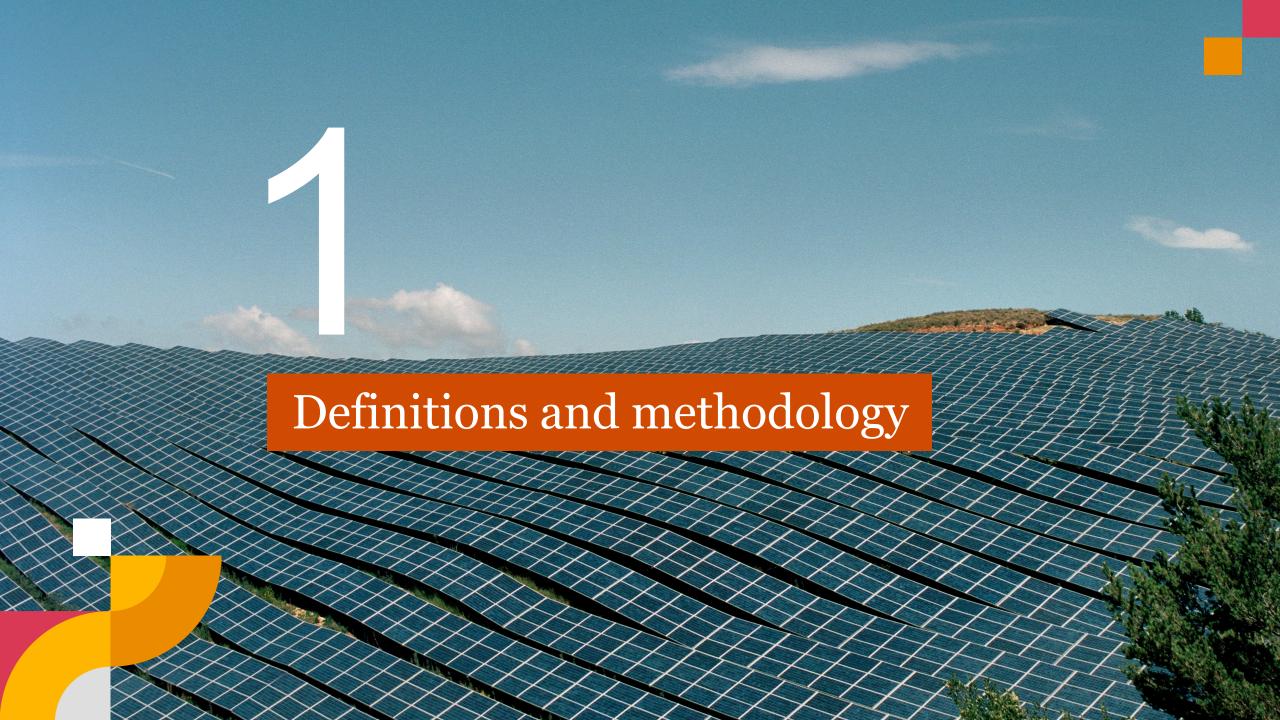
- Develop a holistic and long-term strategic view.
- Develop deep knowledge and understanding of the issues and business implications for clients.
- Identify opportunities to collaborate with other professional service firms on thought leadership and pursuit initiatives.
- Develop a firmwide branding approach as well as invest in practitioner credentials and brand.

Source: Primary research interviews



## Contents

- 1. Definitions, scope, and methodology
- 2. Key trends in sustainability
- 3. 6 key themes in sustainability
- 4. Insights for lawyers
- 5. Opportunities for lawyers
- 6. Conclusion



## Research into sustainability opportunities for Singapore-based lawyers

#### Interviews conducted

Over August to October 2024, PwC interviewed 66 sustainability legal industry stakeholders consisting of 3 academics, 15 in-house counsels, 24 sustainability lawyers, and 24 business leaders to get their perspectives on megatrends shaping the sustainability market, value chain analysis on key trends we have uncovered, and legal service opportunities for Singapore-based lawyers and law firms. The interviewees represented a cross section of industries, providing nuances to their legal service needs driven by the sustainability trends:

- · Agriculture
- Aviation
- · Banking and finance
- · Building and construction
- · Carbon markets
- · Consulting engineering
- Energy
- Fashion
- · Legal services

The preliminary findings of this report were presented to a selected interviewees and representatives from sustainability working groups of LawSoc and SCCA.

#### Focus group conducted

PwC also conducted a focus group with ISCA and LawSoc with participants across the professional services sector in the different sustainability value chains.

The participants include law firms, advisory firms, and accounting firms.



## Definitions

Key Themes	Category	Definition
Mandatory targets	Sustainability reporting	Sustainability reporting involves the systematic disclosure of an organisation's environmental, social, and governance (ESG) performance in line with regulatory requirements such as the Corporate Sustainability Reporting Directive (CSRD) or SGX-ACRA's finalised climate reporting and assurance roadmap.
	Sustainability law and compliance	Sustainability law and compliance encompasses a range of upcoming noteworthy sustainability regulations designed to alter the way business is conducted.
Green finance	Sustainable debt (including transition and blended finance)	Sustainable debt includes sustainable bonds and sustainable loans. Sustainable bonds include Green, Social, Sustainability, Sustainability-linked and transition bonds while sustainable loans are similar but are smaller and issued through a private operation (without being publicly traded or listed).
	Investment funds	Investment funds in green finance include (1) funds with normal investment operations that now incorporate sustainability considerations into their portfolio selection and management, however, sustainability factors might not be the focus of the investment process, (2) general sustainability investment funds that have sustainability criteria as a focus or binding factor in their security-selection and portfolio-construction process, and (3) sustainability-themed investment funds that explicitly target exposure to one or more sustainability themes.
Capital projects and infrastructure	Infrastructure projects and energy	The energy sector projects encompass the supply of energy sources and production and distribution of power from diverse clean energy sources, including renewables such as solar and wind, as well as other low-carbon fuels like biogas and hydrogen. Additionally, it involves sustainability-related work on projects tied to non-clean energy sources, including coal and natural gas.
	Green buildings	A building is considered to be green if they meet minimum environmental sustainability standards (effective as of April 2008) or achieve the Building and Construction Authority's (BCA) Green Mark certification.
Green innovation carbon markets	Technologies and digital innovations	Includes innovations to address environmental, societal and governance challenges (e.g. promoting circular economy, energy efficiency solutions, reducing carbon emissions, ensuring sustainable food supply, enhancing supply chain transparency).
	Carbon markets	Includes carbon offset projects which reduce or remove greenhouse gas emissions, generating carbon credits to offset emissions from other sources, and carbon commodity trading which is market-based trading of carbon credits, allowing entities to buy or sell to meet regulatory or voluntary targets.
Sustainability disputes	Climate change and sustainability disputes	Sustainability disputes involves court cases or arbitration cases concerning sustainability-related issues. This includes disputes over breaches in sustainability commitments, such as sustainability practices or greenwashing allegations.

# Sizing approach: market sizing of each themes incorporated considerations of market trends and drivers, as well as estimated service opportunity for lawyers

Breakdown of market sizing approach by theme:

	Market trends and	drivers for each then	ne						
	Reporting	Compliance	Sustainable debt	Sustainable funds	Energy projects	Green buildings	Carbon markets	New technologies	Disputes
Today	Number of companies impacted by SGX- ACRA climate reporting and assurance roadmap and CSRD	Number of companies impacted by the EU Deforestation Regulation (EUDR), Extended Producer Responsibility (EPR) and Carbon Border Adjustment Mechanism (CBAM) in Singapore	Number of green, social, sustainability bonds and loans issued in Singapore	Assets under management and number of transactions by both, funds with sustainability considerations and sustainable funds	Investment in clean energy in Southeast Asia (low emissions electricity, grids and storage) funded through Singapore	Number of green buildings projects in Singapore	New carbon offset projects in Southeast Asia; Number of companies purchasing carbon credits	Total number of patent applications in Singapore towards Sustainable Development Goals	Number of active sustainability-related arbitration and litigation cases
Forecast	Based on the timeline as proposed by regulations, assuming drop off in outsourcing rates	Number of companies impacted to stay the same, though outsourcing rates are to decline	To grow in line with global real gross domestic product (GDP) growth	To grow in line with global real GDP growth	Based on estimates from the International Energy Agency (Announced Pledges Scenario)	Based on 80% green building target by 2030	Assumed to follow average annual increase in number of projects during 2016-2023	To grow in line with real GDP growth	Assumed to follow average annual increase in number of arbitration cases during 2011-2023



We multiply the size or quantity of the underlying trend with the potential legal fees per project

Potential legal fees	(Dependent on level	of risk, complexity, siz	ze of work, regulatory	requirements) – expe	cted to remain consta	nt over time		
Reporting	Compliance	Sustainable debt	Sustainable funds	Energy projects	Green buildings	Carbon markets	New technologies	Disputes
Hours required to support on legal review and Scope 3 related contracting work	Hours required to support on advisory or interpretation of regulations	Hours required per bond or loan issuance project	Fees paid out for typical operations (on the asset under management) and per deal	Hours of work required to ensure compliance, contract drafting, and operations	Hours of work required to ensure compliance with regulations	Hours of work required to support compliance in the project development, contract drafting for purchase of credits	Hours of work required to support patent applications	Annual spend on legal fees for dispute resolution



# Singapore's sustainability regulatory and governmental efforts shows its commitment to establish regional leadership



Singapore has recently introduced significant sustainability policies, imposing new regulatory obligations on companies

Singapore has published a Climate Reporting and Assurance Roadmap including recommendations for mandatory climate reporting (e.g. Scope 1 and 2 reporting, and eventual phasing in of Scope 3 reporting) and assurance requirements for listed issuers and large non-listed companies.

The BCA has updated the regulatory requirements for new buildings and existing buildings undergoing major additions, and alterations and regulatory requirements for existing buildings, which, among other things, cover minimum environmental sustainability standards.

The Resource Sustainability Act 2019 gives legislative effect to regulatory measures targeting three priority waste streams: 1) Regulated e-waste management system; 2) Mandatory Packaging Reporting (MPR) scheme; 3) Food waste segregation for treatment and reporting by large commercial and industrial generators.



Singapore is a frontrunner in Southeast Asia in sustainability-related regulatory developments, particularly in sustainability reporting and sustainable finance

Singapore pioneered the implementation of a carbon tax in Southeast Asia, setting a precedent for other countries in the region. Thailand has since introduced its own carbon tax in 2025.

MAS introduced the Singapore-Asia Taxonomy for Sustainable Finance, which outlines specific thresholds and criteria for identifying green and transition activities that aid in climate change mitigation across eight key sectors. Although currently voluntary, it is anticipated that the Singapore-Asia Taxonomy may become mandatory in the medium term.

MAS launched the Sustainable Bond Grant Scheme (SBGS) and the Sustainable Loan Grant Scheme (SLGS) to subsidise costs associated with external reviews of qualifying instruments. These initiatives aim to encourage the adoption of internationally recognised standards and taxonomies.



# Developments in sustainability-related regulation from advanced markets are also impacting companies in Singapore

#### **Corporate Sustainability Reporting Directive (CSRD)**

Imposes obligations on EU and non-EU companies with relevant EU business activities through a phased approach, with disclosure requirements applicable as early as FY24 (filing in 2025). Non-EU companies included in scope of regulation from FY28.

#### **Corporate Sustainability Due Diligence Directive (CSDDD)**

Establishes a due diligence duty for in-scope companies to identify and address potential and actual adverse human rights and environmental impacts. In addition, large companies would be required to prepare transition plans aligned to the Paris Agreement. Non-EU companies meeting certain thresholds could be in scope from 2028.

#### **Carbon Border Adjustment Mechanism (CBAM)**

Places a price on the embedded carbon emissions generated in the production of certain imported goods. Currently in a transitional phase, CBAM's definitive regime will apply from 2026. Under CBAM, importers of relevant products will need to report the emissions produced during manufacturing, requiring non-EU suppliers to measure and report.

#### **EU's Forced Labour Regulation**

Entered into force in the second half of 2024. This would ban products made with forced labour from entering the EU single market and may implicate Singapore companies that export products to the EU.



#### **Regulation on Deforestation Free Products (EUDR)**

Rules to guarantee that products EU citizens consume do not contribute to deforestation or forest degradation worldwide. Non-EU companies who place relevant products on the EU markets must submit a due diligence statement showing compliance, and non-EU companies who form part of supply chains will have to provide information about the origin of the product to enable appropriate due diligence.

### Southeast Asian countries have different timelines for net zero commitments

#### Laos<sup>1</sup>

Reduce GHG emissions to zero by 2050

### Myanmar<sup>2</sup>

- Increased share of renewable energy mix from 2000MW to 3070MW by 2030
- Complete phasing out of coal by 2050

### Thailand<sup>3</sup>

- Carbon neutral by 2050
- Net zero by 2065
- 20 25% reduction in emissions by 2030, compared to 'business as usual'
- 67 industrial zones<sup>10</sup>

### Malaysia<sup>4</sup>

- 45% reduction of greenhouse gases by 2030
- Net zero by 2050
- 247 industrial zone<sup>10</sup>

### Indonesia<sup>5</sup>

- Net zero by 2060
- 29 41% reduction in emissions by 2030
- 118 industrial zones<sup>10</sup>

### Vietnam<sup>6</sup>

- · Net zero by 2050
- 563 industrial zones<sup>10</sup>

### Philippines<sup>7</sup>

- 75% reduction in GHG emissions, with 2.71% unconditional reduction for period 2020-2030 for agriculture, waste, industry, transport and energy
- 251 industrial zones<sup>10</sup>

#### Brunei<sup>8</sup>

- Net zero by 2050
- 20% reduction in GHG emissions by 2030

### Singapore<sup>9</sup>

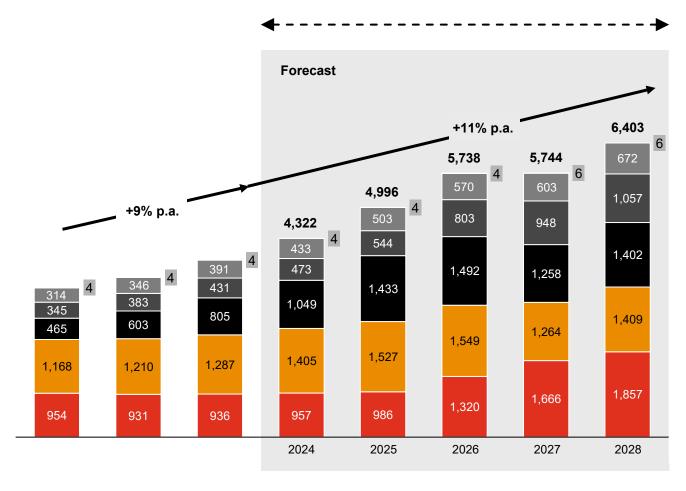
- Net zero by or around 2050
- Singapore Green Plan 2030:
- 4x solar energy deployment and greening of 80% of all buildings over the next decade
- Reduce landfill waste by 30% by 2030
- 6 industrial zones<sup>10</sup>

- United Nations. "Raising the Bar for Net-Zero: Lao PDR Revises Climate Commitments." United Nations Development Programme, 27 February 2025. <a href="https://www.undp.org/laopdr/press-releases/raising-bar-net-zero-lao-pdr-revises-climate-commitments">https://www.undp.org/laopdr/press-releases/raising-bar-net-zero-lao-pdr-revises-climate-commitments.</a>
- Environmental Conservation Department of the Republic of the Union of Myanmar. "Renewable Energy Situation in Myanmar." 6
   October 2023. <a href="https://www.nstda-tiis.or.th/wp-content/uploads/2023/10/06">https://www.nstda-tiis.or.th/wp-content/uploads/2023/10/06</a> Renewable-energy-situation-in-Myanmar TTSM.pdf.
- Rattiwan, Suwit. "Thai PM to Announce Thailand's Climate Change Reduction Plans at COP26." National News Bureau of Thailand, 1 November 2021. <a href="https://aseannow.com/topic/1237610-thai-pm-to-announce-thailand%E2%80%99s-climate-change-reduction-plans-at-cop26">https://aseannow.com/topic/1237610-thai-pm-to-announce-thailand%E2%80%99s-climate-change-reduction-plans-at-cop26</a>
- 4. Ministry of Investment, Trade and Industry Malaysia. "New Industrial Master Plan 2030: Mission 3 Push for Net Zero." Accessed 19 March 2025. https://www.nimp2030.gov.my/index.php/pages/view/82?mid=472.
- Fogarty, David, and Cheryl Tan. "Indonesia Says It Can Reach Net-Zero Emissions by 2055, Five Years Ahead of Target." The Straits Times, 21 November 2024.

- Climate Action Tracker. "Net Zero Targets: Viet Nam." Accessed 19 March 2025. https://climateactiontracker.org/countries/vietnam/net-zero-targets/.
- Baker McKenzie. "Global Sustainable Buildings Guide Philippines: CO2 and Energy Targets." Accessed 19 March 2025. https://resourcehub.bakermckenzie.com/en/resources/global-sustainable-buildings/asia-pacific/philippines/topics/co2-and-energy-targets
- Hon. Dato Ir. Suhaimi Gafar. "National Statement of Brunei Darussalam." Presented at the High-Level Segment of UNFCCC COP 26 / CMP 16 / CMA 3, 9 November 2021.
   Government of Singapore. "Our Key Targets for the Green Plan." Accessed 19 March 2024.
- Government of Singapore. "Our Key Largets for the Green Plan." Accessed 19 March 202: https://www.greenplan.gov.sg/targets/.
   Bain & Company. Southeast Asia's Green Economy 2024. 2024.
- Bain & Company. Southeast Asia's Green Economy 2024. 2024. https://www.bain.com/globalassets/noindex/2024/bain\_report\_southeast\_asias\_green\_economy\_2024.pdf

## IDC forecasts the sustainability business services in Asia Pacific to grow at 11% p.a. between 2023-28 to \$6.4 trillion





Source: International Data Corporation. "Purpose-Built Sustainability Services Market 2024-28." Market Report. Needham: IDC, 2024.

#### The report includes the following services by segment:

- Strategy: Sustainable business strategy, sustainability alignment, Corporate Social Responsibility (CSR) and philanthropy, corporate purpose, and program development
- Operations or business model: Materials coursing, supply chain service, carbon accounting, water management, hazardous materials management, circular economy, procurement, and climate impact forecast
- **Financing and accounting:** Sustainability capital market operations, billing and energy costs, asset stewardship, and proxy voting and countermeasures
- Human capital: Employee health and safety, employee engagement, labour practices and relations, executive compensation, diversity, equity and inclusion, training and upskilling
- Governance risk and compliance: Sustainability monitoring, reporting or disclosure, sustainability auditing, sustainability assurance, systematic risk management, legal, regulatory and compliance, customer privacy and data security, ethics and trust
- Communication: Sustainability and CSR marketing
- Considering the CAGR of "Governance, Risk, and Compliance" and "Human Capital Management," it is projected that sustainability business services in the Asia-Pacific region will expand at an annual rate of 11%. The following slide provides a more detailed analysis of Singapore's growth.

### Worldwide Purpose-Built Sustainability Services Spending by Region and Service Line (APAC)

Se	rvice Line	CAGR 2021-23	CAGR 2023-28
	Communications	-2%	11%
	Finance and accounting	12%	11%
Susiness services nvolving lawyers	Governance risk and compliance	12%	20%
Busine servic involv lawye	Human capital management	32%	12%
	Strategy	5%	2%
	Operations/business model	-1%	15%

## Singapore's market for sustainability legal work in 2023 is an estimated \$140m - \$180m broken into two categories

Estimated market size of value of sustainability legal work by Singapore-based lawyers<sup>1</sup> In SGD\$ million (S\$m), 2023



### Standalone sustainability legal work

Refers to opportunities that have come by purely due to sustainability requirements and would not exist otherwise:

- All legal work related to carbon markets
- All sustainability driven disputes (e.g. greenwashing)
- Reporting and compliance requirements driven by regulation and standards established by bodies, government, and regulators.

### Top-up sustainability legal work

Refers to additional sustainability requirements and elements being introduced to existing legal work:

- Drafting contract clauses to include sustainability requirements (e.g. Scope 1 or Scope 2 checks) to existing contracts.
- Additional sustainability due diligence as part of legal due diligence that are set out by investors, businesses or government.

"

The market for ESG work is more horizonal in nature...shaped like a T rather than just pure ESG work

- Executive Director, Green Building Non-Profit Organisation

77

"

So far...work hasn't been extensive enough for us to have a dedicated partner to ESG work, rather it's just an additional amount in our existing work

- Partner, International Law Firm based in Singapore

"

Trends like carbon markets are creating additional work requirements, but it's still fairly small to deserve its own business unit

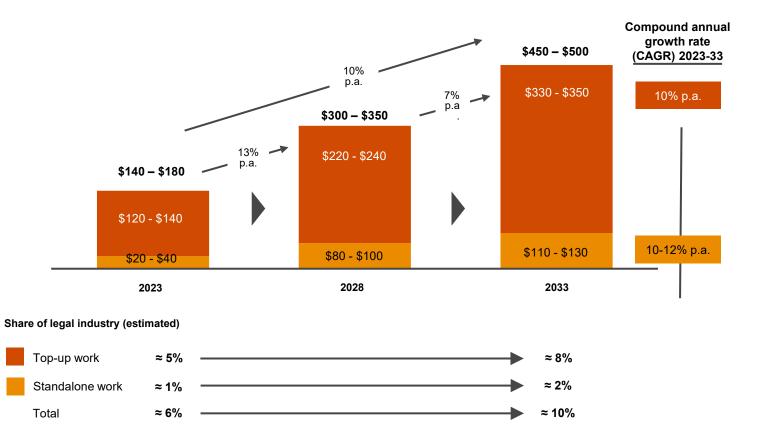
- Partner, Local Law Firm

IJ

The estimated value of the sustainability legal work includes current legal work that Singapore lawyers provide that
are sustainability themed but recognised under other practice areas' revenue.

# Legal service opportunities from sustainability trends is forecasted to grow twice as fast as the legal industry average from 2023 to 2033

## Estimated size of opportunities for Singapore-based lawyers (\$m) 2023-2033

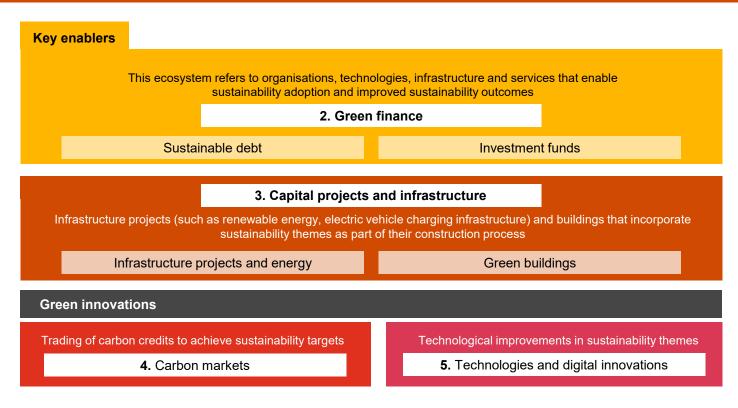


### **Market opportunities**

- Regulatory influence: Government regulations and mandatory targets are the primary drivers for sustainability adoption.
- Incentives and penalties: Various sectors have seen the introduction of regulations and incentives, employing both rewards (e.g. funding for meeting conditions) and penalties (e.g. fines for non-compliance).
- Singapore's sustainability track record:
   The Singapore government has been proactive in implementing sustainability regulations (e.g. Carbon Tax, MAS rules, Article 6).
- Role of Singapore lawyers: Lawyers in Singapore will remain influential in Southeast Asia as long as financing is routed through the country.
- Voluntary adoption: Voluntary sustainability targets drive demand, noting that these are sensitive to economic peaks and troughs, despite potential reputational benefits.

# Sustainability trends can be classified into 6 key themes and categorised into target setting, key enablers, and disputes





#### **Disputes driven**

Dispute resolutions help in preventing fraud or misuse of funds or technologies under the 'sustainability' brand name (such as greenwashing) – present across all value chains

#### 6. Sustainability disputes

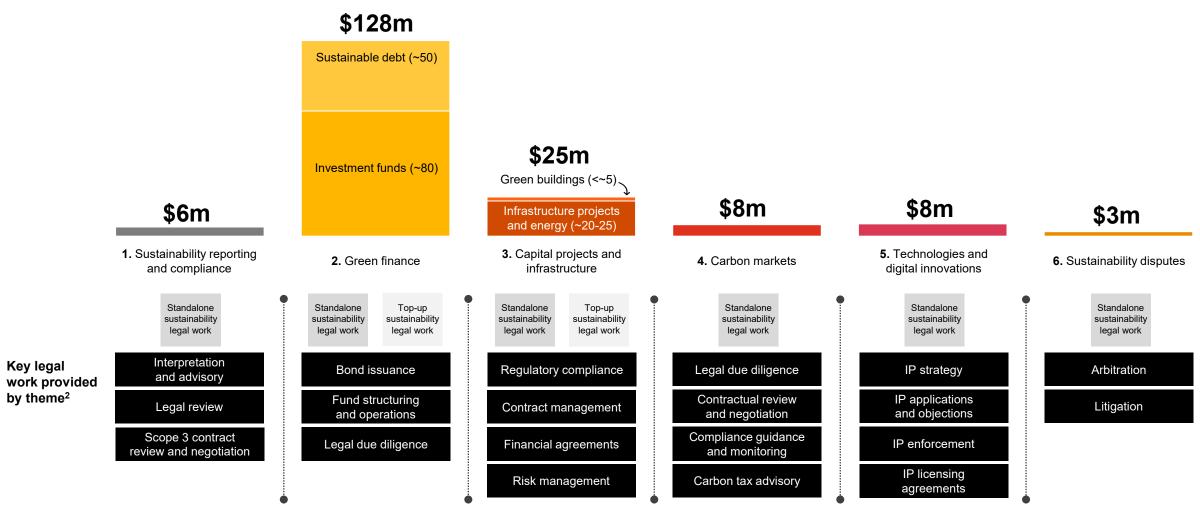
Disputes arising through failure to comply with environmental regulations and contracts, including greenwashing and contract disputes

Climate change and sustainability disputes



# In 2023, green finance and capital projects presented the largest legal opportunities for Singapore lawyers

Estimated market size of sustainability legal service opportunities by theme (S\$ m, 2023)



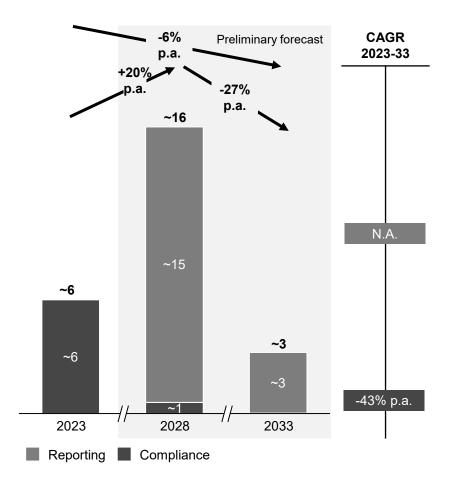
<sup>1.</sup> Further information regarding market sizing approach and underlying assumptions can be found in page 66. Source: Press search, Industry consultations, Strategy and analysis

<sup>2.</sup> Note the key legal services listed are focused on the main legal work provided in each theme and not meant to be exhaustive.



## Sustainability reporting and compliance is an estimated \$6m legal services market for lawyers

Estimated size of opportunities for Singapore-based lawyers (\$m) 2023-2033



#### 

#### Market drivers

Key:

**Reporting1:** The scope of sustainability reporting in Singapore is steadily broadening, and with the new mandatory climate. reporting requirements, the demand for lawyers to review these reports is set to rise.

**Compliance<sup>2</sup>:** Tighter EU regulations on sustainable practices are enforcing global supply chain compliance, affecting companies in Singapore that trade with the EU.

#### Legal service opportunities

- Interpretation and advisory: Analyse sustainability reporting requirements and regulations, provide advice to ensure compliance with international standards.
- Legal review: Review sustainability reports, websites, and advertising materials for accuracy and identify greenwashing risks.
- Scope 3 contracting work: Draft, review, and negotiate agreements for emissions data and supply chain transparency.

## Summary of analysis

#### Market definition

= Negative

Outlook

Legal involvement

Short

term

Long

term

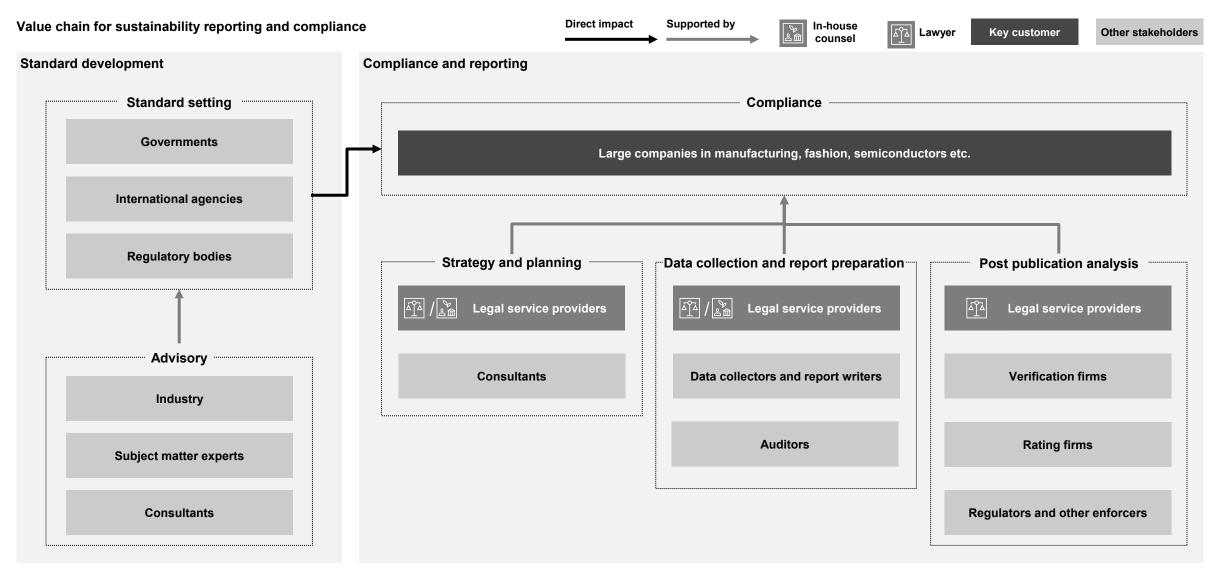
- Reporting involves disclosing sustainability performance as mandated by regulations like CSRD and SGX-ACRA, while compliance encompasses new EU regulations impacting companies in Singapore trading with the EU such as CBAM, EUDR, EPR, and CSDDD.
- Sustainability reporting and compliance is a standalone sustainability legal work.

#### Market size

- Estimated \$6m in 2023 and will grow into a \$16m market by 2028 but shrink into a \$3m market in 2033 due to the prediction that advisory work for new regulation around sustainability reporting will reduce over time.
- Legal opportunities include interpretation and advisory, legal review, and Scope 3 contracting.

- 1. Reporting refers to sustainability reporting undertaken by the company (e.g. mandatory climate reporting requirements).
- Compliance refers to sustainability regulation in addition to reporting (e.g. EU forced labour regulation).
- 3. The legal involvement for lawyers is assessed as low because the legal service opportunity is only in regulatory advisory. When future regulations are introduced (e.g. Scope 3 contracting work), legal service involvement moves to medium.

# Lawyers are involved across the compliance and reporting value chain for large organisations with mandatory targets



# Lawyers are involved throughout the compliance and reporting value chain and in-house lawyers will be responsible for lower risk, high volume engagements

Value chain stages a	nd activities	Breakdown of legal service, risk, frequency, and lawye	rs involved						
Stage	Activity	Key legal services	Foreign/local lawyers <sup>1</sup>	High risk <sup>2</sup>	High frequency <sup>3</sup>	Lawyers involved			
Standard	Standard setting	Standards setting and advisory							
development	Advisory	Standards setting and advisory usually handled by regulatory bodies and their in-house counsels							
	Compliance	<ul> <li>Provide legal guidance on interpreting regulations.</li> <li>Participate in drafting internal policies to ensure compliance.</li> <li>Assist with internal reviews and remediation efforts.</li> </ul>	Local	<b>~</b>	×	Lawyer			
Compliance and	Data collection and report preparation	<ul> <li>Ensure that data collection methods adhere to privacy and data protection laws.</li> <li>Review report drafts to confirm compliance and mitigate risks</li> <li>Draft supplier contracts.</li> </ul>	Both	×	<b>✓</b>	In-house			
reporting		<ul> <li>Conduct legal due diligence on suppliers.</li> <li>Review contracts to include essential sustainability clauses and protections.</li> </ul>	Both	<b>✓</b>	<b>~</b>	In-house / lawyer			
	Post-publication analysis	<ul> <li>Perform legal due diligence on counterparties.</li> <li>Advise on legal aspects of communicating sustainability performance to stakeholders.</li> </ul>	Both	<b>✓</b>	<b>✓</b>	In-house / lawyer			

<sup>1.</sup> Whether the legal service can only be provided by lawyers in Singapore due to regulatory limitations, knowledge of local laws and/or understanding of local context.

<sup>2.</sup> Where the risk related to the legal service is high, companies prefer to engage lawyers to assist.

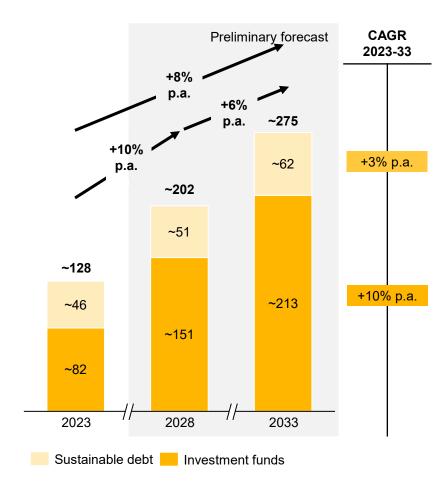
<sup>3.</sup> Where the legal services are frequently required in business operations, companies typically prefer to hire in-house counsel to manage these needs directly.

# Breaking down the key services across the stakeholders and professional service firms in the value chain

Value chain stages an	d activities	Breakdown of profess	ional service stakeholders and services involved in the value chain
Stage	Activity	Other stakeholders and examples	Key professional services (excluding legal services)
Standard	Standard setting	Government International agencies Regulatory bodies	<ul> <li>Implement country-specific laws that require detailed sustainability reporting.</li> <li>Create universal guidelines to maintain uniformity and comparability in sustainability data across sectors and regions.</li> <li>Ensure compliance with these guidelines to promote transparency and uphold the credibility of sustainability reports.</li> </ul>
Development	Advisory	Industry Subject matter experts Consultants	<ul> <li>Offer actionable insights and evaluations on the relevance, efficiency, and consequences of standards.</li> <li>Deliver expert knowledge and perspectives.</li> <li>Disseminate best practices, highlight new trends, and address practical challenges in implementation to create robust standards.</li> </ul>
	Strategy and planning	Consultants	<ul> <li>Guide organisations in setting emission reduction targets, formulating strategies, creating internal policies for sustainability reporting, and aligning these with local and global standards.</li> <li>Develop comprehensive implementation timelines to help organisations monitor progress and improve transparency in sustainability efforts.</li> </ul>
Compliance and reporting	Compliance	Large companies (e.g. manufacturing, semiconductors fashion)	<ul> <li>Implement and monitor their compliance with environmental regulations, maintain transparent sustainability reporting, address any compliance gaps, and show accountability to stakeholders through comprehensive performance disclosures and audits.</li> <li>Monitor supply chains to ensure compliance with tightening regulations, focusing on Scope 3 emissions, noting this is pertinent for the fashion and manufacturing sectors.</li> </ul>
roporting	Data collection and report preparation	Consultants (for report writing) Auditors	<ul> <li>Collect precise data, evaluate performance, and compile comprehensive reports that comply with regulatory and industry standards.</li> <li>Perform independent verification of gathered data, evaluate the accuracy of reports, and ensure adherence to sustainability and environmental regulations and standards.</li> </ul>
	Post publication analysis	Certification firms Ratings agency Regulators and other enforcers	<ul> <li>Verify and certify that reports adhere to standards, ensuring the accuracy and credibility of the information provided.</li> <li>Assess organisational performance based on their reports, offering transparency, and comparative insights.</li> <li>Resolve any discrepancies found in the published reports.</li> </ul>

## Green financing is an estimated \$128m legal services market for lawyers

Estimated size of opportunities for Singapore-based lawyers (\$m) 2023-2033



#### 1. The risk of greenwashing in green financing mean lawyers are involved across all stages of the value chain.

#### Key:



#### **Market drivers**

- The growth of **sustainable finance** has been supported by MAS regulation and initiatives (e.g. Finance for Net Zero Action Plan and Singapore-Asia Taxonomy).
- Sustainable debt: The market opportunity for lawvers can be found in bond transactions. where Singapore has emerged as the leader in the Southeast Asia region leading in green buildings and infrastructure.
- **Investment funds:** The market opportunity for lawyers is driven by the underlying growth in assets under management in Singapore, with more than 50% of these funds already integrating sustainability considerations into their investment processes.

#### Legal service opportunities

- Bond issuance: Ensure the issuer's financial health and legal standing, as well as draft and review key documents (e.g. bond prospectus and indenture).
- Fund structuring and operations: Advise on fund structure, draft and review offering documents, ensure compliance with sustainability regulation.
- **Legal due diligence**: Check on the target's contract and compliance, draft and negotiate key documents, and oversee the closing process.

#### Outlook

Legal involvement



A

- Estimated \$128m in 2023 and will grow into ~\$202m market by 2028 and then ~\$275m market in 2033 due to growth of sustainable finance that's supported by MAS regulation and initiatives as well as Singapore's finance hub status.
- · Legal opportunities include bond issuance, fund structuring and operations, and legal due

### **Summary of analysis**

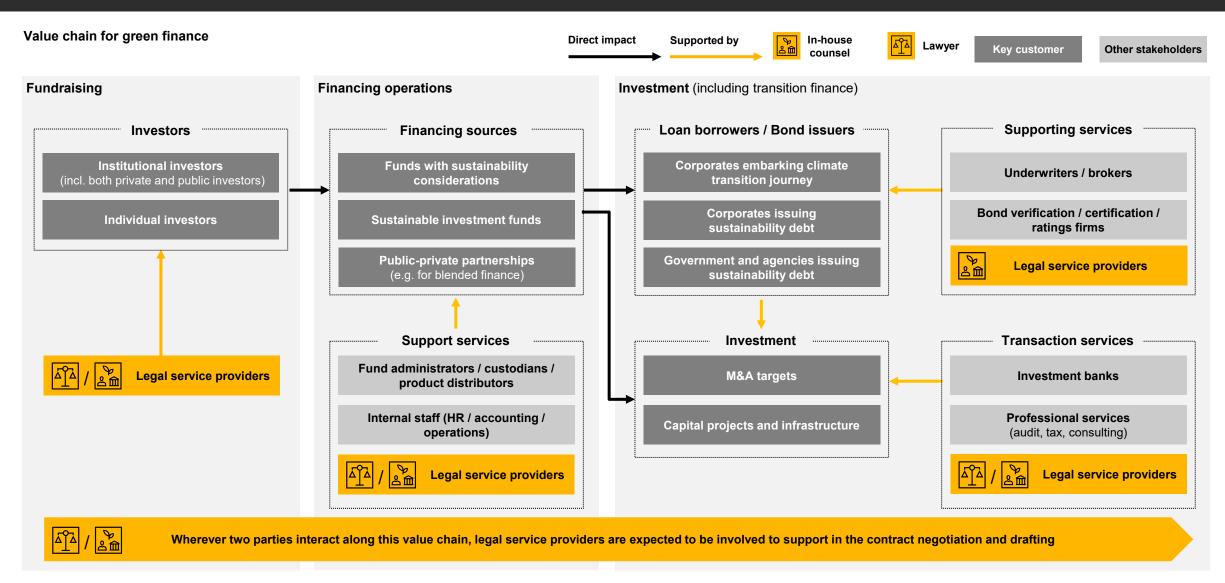
#### Market definition

- This includes sustainable debt (bonds and loans) across 5 areas (green, social, sustainability, sustainabilitylinked and transition), investment funds with sustainability considerations, and sustainable investment funds.
- · There are both top-up and standalone sustainability opportunities for lawyers in green financing.

#### Market size

diligence.

## Sustainability consideration differentiates sustainability investment and a 'typical' investment's value chain



# In-house lawyers and external counsel are involved across the green financing value chain because of risks involved

	Value chain stages and activities		Breakdown of legal service, risk, frequency, and lawyers involved						
	Stage	Activity	Key legal services	Foreign / local lawyers <sup>1</sup>	High risk <sup>2</sup>	High frequency <sup>3</sup>	Lawyers involved		
	Financing	Fundraising	<ul> <li>Formation of the fund, preparation of subscription agreements, and creation of fund governance documents.</li> <li>Conduct anti-money laundering (AML)/know your customer (KYC) checks and maintain related documentation.</li> <li>Draft and negotiate investor agreements, ensuring alignment with sustainability principles, and regulatory requirements.</li> <li>Ensure compliance with disclosure and reporting regulations such as Sustainable Finance Disclosure Regulation (SFDR).</li> </ul>	Both	<b>✓</b>	×	In-house / lawyers		
	Fund operations	Operating funds	<ul> <li>Handle business-as-usual contracting and maintain general compliance with financial regulatory standards.</li> <li>Draft policies to ensure fund operations adhere to governance and sustainability standards.</li> <li>Structure agreements between fund managers and investors, incorporating sustainability metrics and targets.</li> </ul>	Both	<b>✓</b>	<b>✓</b>	In-house / lawyers		
		Supporting services	<ul> <li>Advise on ongoing regulations, employment contracts, and supplier contract negotiations.</li> <li>Draft and review contracts, including fund documents and procurement contracts.</li> </ul>	Both	<b>✓</b>	×	In-house / lawyers		



- 1. Whether the legal service can be only be provided by lawyers qualified to practice in Singapore due to regulatory limitations, knowledge of local laws and/or understanding of local context.
- 2. Companies prefer to engage lawyers when the legal risks are high.
- 3. When the legal services are needed frequently in business operations, companies will generally opt to engage an in-house counsel to provide the work (especially if the legal risk is not too significant).

5. Technologies and digital innovations

## In-house lawyers and external counsel are involved across the green financing value chain because of risks involved

Value chain stages and activities		Breakdown of legal service, risk, frequency, and lawyers involved						
Stage	Activity	Key legal services	Foreign / local lawyers <sup>1</sup>	High risk <sup>2</sup>	High frequency <sup>3</sup>	Lawyers involved		
	Borrowing / bond issuance	<ul> <li>Draft green bond issuance documents and ensure adherence to international standards like the Green Bond Principles and Climate Bonds Initiative.</li> <li>Advise on listing requirements for green bonds on exchanges.</li> </ul>	Both	<b>✓</b>	<b>~</b>	In-house / lawyers		
	Bond issuance supporting services	<ul> <li>Negotiate, draft, and review contracts, including bond offering documents and prospectuses.</li> <li>Perform due diligence on potential investments to assess their compliance with sustainability standards.</li> </ul>	Both	<b>~</b>	<b>~</b>	In-house / lawyers		
Investment	Investing	Negotiate, draft, and review contracts such as secured loan agreements and investment documents.	Both	<b>✓</b>	<b>~</b>	In-house / lawyers		
		Conduct due diligence on potential investments to ensure sustainability compliance.	Both	<b>✓</b>	×	Lawyers		
	Transaction services	<ul> <li>Draft and review sale and purchase agreements.</li> <li>Advise on compliance with regulations related to the transfer of ownership of specific underlying assets, ensuring adherence to sustainability standards.</li> </ul>	Both	<b>✓</b>	<b>~</b>	In-house / lawyers		
		Perform due diligence on underlying assets to assess compliance with sustainability standards.	Both	<b>✓</b>	×	Lawyers		

<sup>3.</sup> When the legal services are needed frequently in business operations, companies will generally opt to engage an in-house counsel to provide the work (especially if the legal risk is not too significant)



<sup>1.</sup> Whether the legal service can be only be provided by lawyers qualified to practice in Singapore due to regulatory limitations, knowledge of local laws and/or understanding of local context

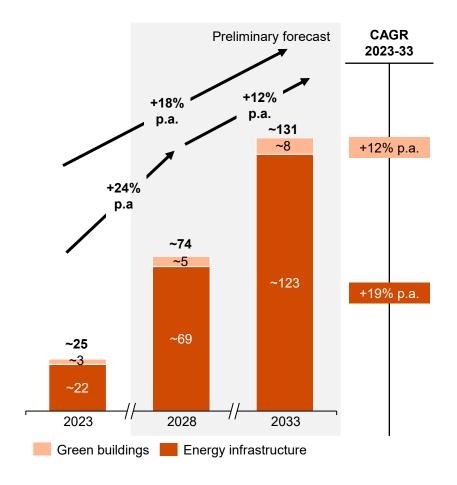
<sup>2.</sup> Companies prefer to engage lawyers when the legal risks are high

# Breaking down the key services across the stakeholders and professional service firms in the value chain

Value chain stages and	d activities	Breakdown of professi	onal service stakeholders and services involved in the value chain
Stage	Activity	Other stakeholders and examples	Key professional services (excluding legal services)
Fundraising	Fundraising	Institutional investors Individual investors Fund managers	<ul> <li>Allocate capital to finance green projects or companies investing in green technology via financial instruments like bonds and stocks.</li> <li>Oversee investment portfolios for investors, selecting and monitoring a mix of assets in line with green investment strategies.</li> </ul>
	Operating funds	Fund managers Public-private partnerships	<ul> <li>Operationalise the management of funds, compile financial reports, and choose and implement green investment strategies.</li> <li>Combine efforts from the public sector, private sector, and philanthropies to finance and manage sustainable infrastructure projects in Southeast Asia.</li> </ul>
Financing operations	Supporting services	Professional services providers Fund's internal staff	<ul> <li>Deliver audit, consulting, and tax advisory services to investment funds, ensuring financial accuracy and regulatory compliance with a focus on sustainability metrics.</li> <li>Internal staff support fund operations by conducting sustainability due diligence, monitoring performance metrics, and ensuring regulatory compliance.</li> </ul>
	Loan borrowing / bond issuance	Corporates Government and agencies	<ul> <li>Corporations and government agencies issue green bonds to raise capital for large-scale capital and infrastructure projects or to expand existing operations.</li> <li>Corporations obtain transition financing to reduce their carbon footprint, favourable interest rates are provided for sustainability performance target set by the financial instrument.</li> </ul>
Investment	Bond issuance supporting services	Underwriters / brokers bond verification, certification and ratings firms	<ul> <li>Underwriters and brokers aid in distributing green bonds from issuers to investors, ensuring those bonds are successfully placed in the market.</li> <li>Bond verification, certification, and ratings firms assess and certify green bonds, providing credibility and assurance to investors.</li> </ul>
	Investing	Acquisition targets Capital projects and infrastructure	<ul> <li>Acquisition targets raising capital through mergers and acquisitions (M&amp;A) or bond issuance to invest these funds into new green projects or infrastructure projects, driving business growth and expansion.</li> </ul>
	Transaction services	Investment banks Professional services providers	<ul> <li>Investment banks facilitate capital flow into green projects, advising on ESG strategies and innovative financing methods such as sustainability-linked bonds and carbon credits.</li> <li>Professional service providers offer ESG due diligence, compliance and value creation advisory, primarily to the project sponsor.</li> </ul>

## Sustainability themed capital projects is an estimated \$25m legal services market for lawyers

Estimated size of opportunities for Singapore-based lawyers (\$m) 2023-2033



#### Key:



#### **Market drivers**

- **Decarbonisation commitment:** Southeast Asia's renewable energy goals are boosting annual clean energy investments, driving new projects.
- Infrastructure financing: Singapore's role in Southeast Asia's infrastructure financing creates significant opportunities for local legal professionals.
- Green building investment: Singapore's Green Plan promotes green building investments, aiming for 80% of gross floor area (GFA) by 2030.

#### Legal service opportunities

- **Regulatory guidance:** Ensure sustainability projects comply with standards, minimising impact and enhancing trust.
- **Contract management:** Draft and review contracts for compliance, clarity, and risk.
- Risk mitigation: Advise on legal risks in project planning to prevent liabilities.
- · Financial agreements: Negotiate and draft agreements for loans, bonds, and equity.
- · Structuring advice: Guide on corporate structuring.

#### Outlook



#### Legal involvement

Energy



Green Buildings



### **Summary of analysis**

#### Market definition

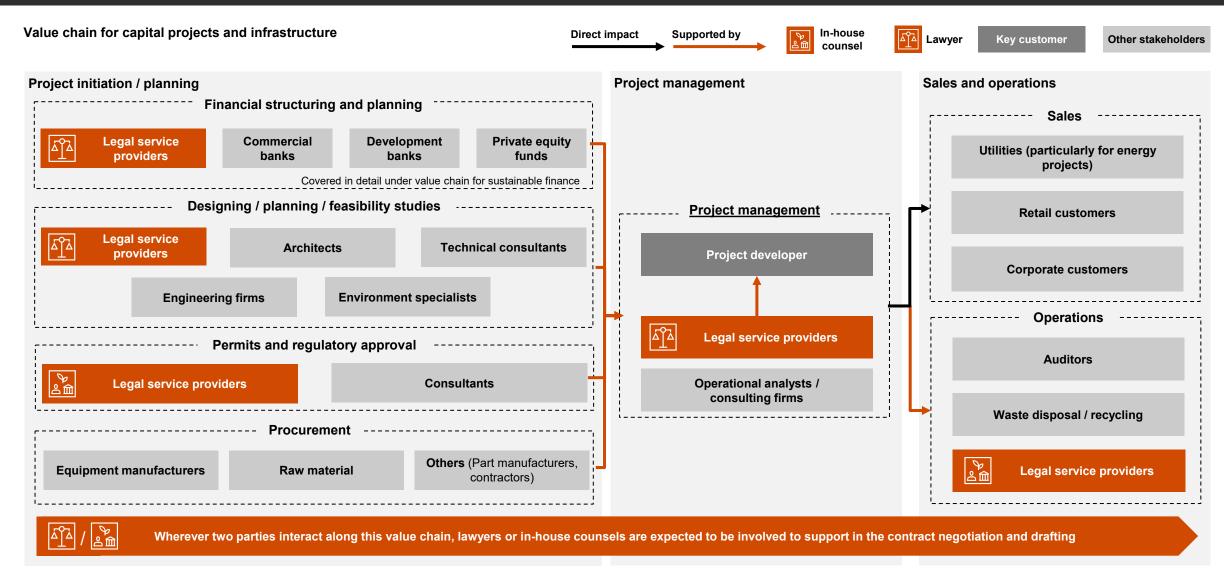
- This includes energy infrastructure, as well as supply, production, and distribution of power from diverse energy sources, and green building projects.
- There are both top-up and standalone sustainability opportunities for lawyers in capital projects and infrastructure.

#### Market size

- Estimated \$25m in 2023 and will grow into a \$74m market by 2028 and then a \$131m market in 2033 driven by increasing clean energy investments in Southeast Asia.
- Legal opportunities include regulatory guidance, contract management, risk mitigation, financial agreements, and structuring advice.

<sup>1.</sup> Lawyers are involved in the early phases of green buildings (e.g., adaptive reuse) projects and as a result, legal service opportunity is lower compared to other areas of work such as financing and disputes in green buildings projects, which are assessed separately, as moderate.

# Infrastructure investments' value chain centres around the project developers that lead the development



## Lawyers are involved in contract drafting and contract reviews in the value chain

Value chain stages and activities		Breakdown of legal service, risk, frequency, and lawyers involved						
Stage	Activity	Key legal services	Foreign / local lawyers <sup>1</sup>	High risk <sup>2</sup>	High frequency <sup>3</sup>	Lawyers involved		
Project initiation / planning (including compliance and reporting)	Designing / planning / feasibility studies	Establish and review company policies to ensure compliance with sustainability standards.	Both	<b>~</b>	×	Lawyer		
		<ul> <li>Perform a comprehensive legal risk assessment to identify potential issues related to sustainability compliance.</li> </ul>						
		<ul> <li>Review contracts with consultants and other involved parties to ensure inclusion of sustainability compliance clauses.</li> </ul>						
	Permits and regulatory approval	<ul> <li>Advise on necessary permits and regulatory approvals, including sustainability-specific regulations.</li> </ul>	Local	<b>✓</b>	×	Lawyer / in-house / non-legal		
		Assist in preparing and submitting permit applications, ensuring they meet all legal and sustainability requirements.						
	Financial planning	Draft, negotiate, and review contracts.	Both	<b>~</b>	×	Lawyer		
		<ul> <li>Draft and review financing agreements to include sustainability compliance terms.</li> </ul>						
		<ul> <li>Conduct due diligence on financial partners to ensure their commitment to sustainability principles.</li> </ul>						
		Structure deals and corporate arrangements.						
	Procurement	<ul> <li>Draft procurement contracts with specific sustainability requirements for suppliers and contractors.</li> </ul>						
		<ul> <li>Perform due diligence on suppliers to verify adherence to sustainability standards.</li> </ul>	Both	×	<b>✓</b>	In-house		
		Handle initial enforcement and dispute resolution.						

- 1. Whether the legal service can be only be provided by lawyers qualified to practice in Singapore due to regulatory limitations, knowledge of local laws and/or understanding of local context,
- 2. Companies prefer to engage lawyers when the legal risks are high,
- 3. When the legal services are needed frequently in business operations, companies will generally opt to engage an in-house counsel to provide the work (especially if the legal risk is not too significant),

## Lawyers are involved in contract drafting and contract reviews in the value chain

Value chain stages and activities		Breakdown of legal service, risk, frequency, and lawyers involved						
Stage	Activity	Key legal services	Foreign / local lawyers <sup>1</sup>	High risk <sup>2</sup>	High frequency <sup>3</sup>	Lawyers involved		
Project management	Project management	<ul> <li>Draft, negotiate, and review contracts.</li> <li>Provide legal support in resolving sustainability compliance disputes during the project.</li> </ul>	Local	×	<b>~</b>	In-house		
Sales and operations	Sales	<ul> <li>Draft sales agreements with sustainability compliance and reporting clauses.</li> <li>Conduct compliance audits on potential buyers to ensure they meet sustainability criteria.</li> </ul>	Local	×	<b>✓</b>	In-house		
	Operations	<ul> <li>Provide legal oversight for ongoing compliance with sustainability regulations during operations.</li> <li>Advise on legal requirements for sustainability reporting and disclosures during operations.</li> </ul>	Local	×	<b>✓</b>	In-house / Non-legal		



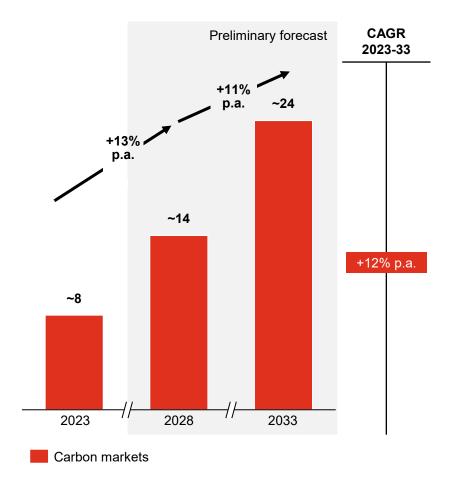
- Whether the legal service can be only be provided by lawyers qualified to practice in Singapore due to regulatory limitations, knowledge of local laws and/or understanding of local context
- 2. Companies prefer to engage lawyers when the legal risks are high
- When the legal services are needed frequently in business operations, companies will generally opt to engage an in-house counsel to provide the work (especially if the legal risk is not too significant)

# Breaking down the key services across the stakeholders and professional service firms in the value chain

Value chain stages an	Value chain stages and activities		Breakdown of professional service stakeholders and services involved in the value chain			
Stage	Activity	Other stakeholders and examples	Key professional services (excluding legal services)			
	Financial planning	Commercial banks Development banks Private equity funds	Supply financial resources, secure capital, and provide strategic investment guidance, risk management, and structuring expertise to ensure sufficient funding, financial stability, and the long-term viability of sustainability-focused capital projects.			
Project initiation / planning (including compliance and reporting)	Designing / planning / feasibility studies	Architects Technical consultants Environment specialists Engineering firms	<ul> <li>Create green designs that align with client requirements and regulatory standards.</li> <li>Deliver specialised expertise and analyses to ensure green designs and plans meet technical criteria for project feasibility.</li> <li>Assess site conditions, perform impact evaluations, and propose sustainable practices.</li> <li>Develop comprehensive engineering solutions and feasibility studies to ensure green projects are structurally sound, efficient, and compliant.</li> </ul>			
	Permits and regulatory approval	Consultants	Secure permissions and approvals, and facilitating project execution in accordance with established guidelines.			
	Procurement	Equipment manufacturers Raw material	<ul> <li>Provide necessary machinery and technology for the green infrastructure projects.</li> <li>Supply essential materials for construction and infrastructure development, ensuring quality and timely availability.</li> </ul>			
Project management	Project management	Developer Operational analysts	<ul> <li>Supervise project execution, coordinate and manage resources, and ensure the project adheres to timelines, budget, and specifications.</li> <li>Evaluate performance, streamline processes, and improve outcomes.</li> </ul>			
Salos and	Sales	Utilities Retail customers	Acquire energy outputs from the green projects, influence service standards, and provide market feedback to ensure end-user needs are met.			
Sales and operations	Operations	Auditors Waste disposal / Recycling	<ul> <li>Ensure operational and reporting compliance and accuracy.</li> <li>Manage and process waste generated, ensuring proper handling and adherence to local regulations.</li> </ul>			

### Carbon market is an estimated \$8m legal services market for lawyers

Estimated size of opportunities for Singapore-based lawyers (\$m) 2023-2033



#### Key:



#### **Market drivers**

- Regulators in Southeast Asia are establishing carbon markets and developing related infrastructure. For example, Singapore's carbon tax regime allows the use of eligible carbon credits to offset up to 5% of the entity's carbon tax liability.
- Investment in carbon offset projects in Southeast Asia is growing, leading to increased development in nature-based solutions and green technologies.
- Singapore is positioned to become Asia Pacific's carbon services and trading hub, leveraging its ecosystem and new offset rules.

#### Legal service opportunities

- Legal due diligence: Verify project eligibility, assess risks, and ensure compliance.
- Contractual work: Negotiate, draft, and review contracts to secure financing.
- · Compliance guidance: Advise on environmental laws, land use, and certification.
- Contract negotiation: Handle negotiation for carbon credits and managing risks.
- Carbon tax advisory: Advise on using eligible International Carbon Credits (ICCs) to offset taxable emissions.
- Compliance monitoring: Ensure compliance, manage reporting.

#### Outlook





#### Legal involvement

to \$14m market by 2028 and a \$24m market in 2033 driven by regulatory push, increasing project investment, and growth of local carbon services ecosystem.

Estimated \$8m in 2023, the market is projected to grow

**Summary of analysis** 

This includes carbon offset

other sources, and carbon

projects, generating carbon

credits to offset emissions from

commodity trading to facilitate

entities in buying or selling to

meet regulatory or voluntary

standalone sustainability legal

The carbon market is a

Market definition

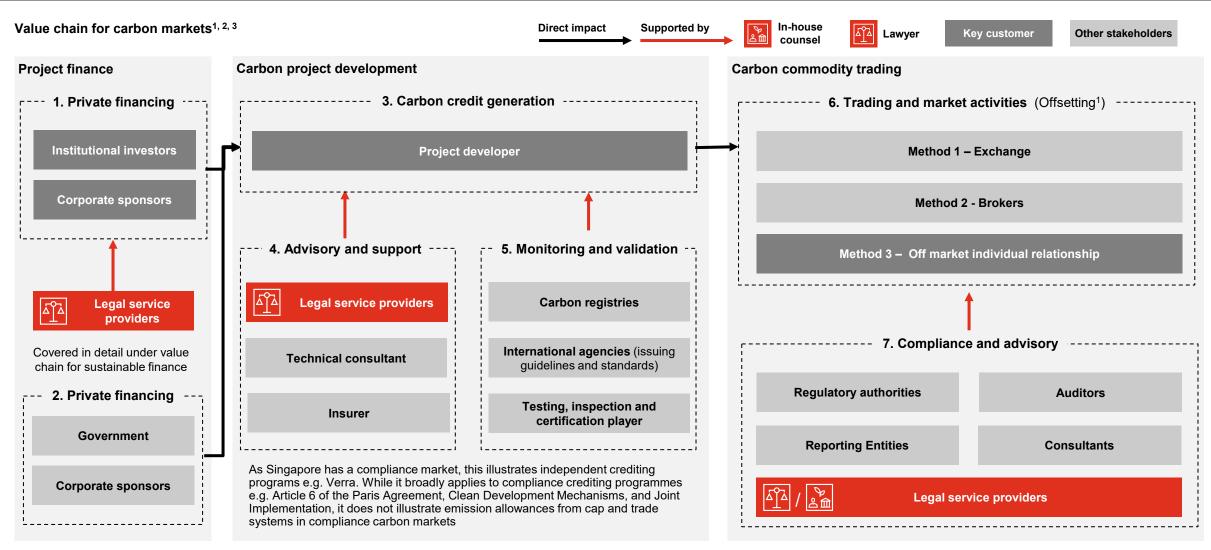
targets.

work.

Market size

Legal opportunities include due diligence, contract work, compliance, contract negotiation, carbon tax advisory, and compliance monitoring.

## Carbon market is an estimated \$8m legal services market for lawyers



Notes: This illustration reflects a carbon credit crediting and trading process, and generally does not apply to cap and trade systems Source:

- 1. Singapore Economic Development Board. "Singapore as a Carbon Services Hub: Market Study 2021." Government Report. Singapore: EDB, 2021.
- 2. Carbon Offset Guide. 2024. "Carbon Offset Guide." Stockholm Environment Institute. https://offsetguide.org/

## Lawyers are involved in early stages of project development, compliance, and contract drafting for off market trading

Value chain stages and activities		Breakdown of legal service, risk, frequency, and lawyers involved						
Stage	Activity	Key legal services	Foreign / local lawyers <sup>1</sup>	High risk <sup>2</sup>	High frequency <sup>3</sup>	Party involved		
Project financing	Financing	<ul><li>Conduct legal due diligence.</li><li>Negotiate, draft, and review contracts.</li></ul>	Both	<b>✓</b>	×	Lawyer		
	Carbon credit generation	-	-	-	-	-		
Carbon project development	Advisory and support	Provide legal advice on compliance with relevant project development regulations.	Both	<b>✓</b>	×	Lawyer		
	Monitoring and validation	<del>-</del>	-	-	-	-		
	Trading and market activities	<ul> <li>Draft service level agreements and terms of use for exchanges.</li> <li>Create a standard contract template for the sale and purchase of carbon credits on exchanges.</li> </ul>	Both	<b>✓</b>	<b>~</b>	In-house/Lawyer		
Carbon commodity trading		Negotiate contracts for off-market transactions.	Both	<b>✓</b>	×	Lawyer		
	Compliance	Monitor compliance and prepare reports.	Both	×	×	Non-legal		

<sup>1.</sup> Whether the legal service can be only be provided by lawyers qualified to practice in Singapore due to regulatory limitations, knowledge of local laws and/or understanding of local context

<sup>2.</sup> Companies prefer to engage lawyers when the legal risks are high

<sup>3.</sup> When the legal services are needed frequently in business operations, companies will generally opt to engage an in-house counsel to provide the work (especially if the legal risk is not too significant)

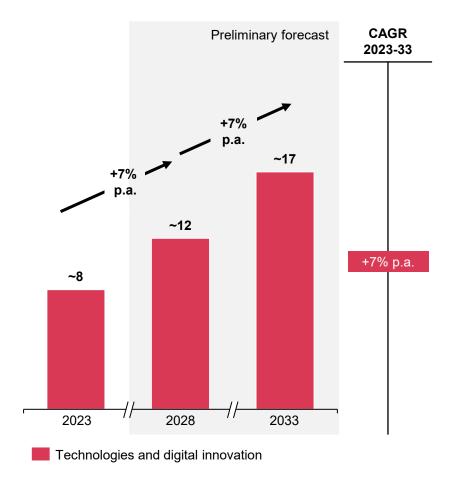
# Breaking down the key services across the stakeholders and professional service firms in the value chain

Value chain stages and activities		Breakdown of professional service stakeholders and services involved in the value chain			
Stage	Activity	Other stakeholders and examples	Key professional services (excluding legal services)		
Project financing	Financing	Institutional investors corporate sponsors government	<ul> <li>Supply capital, strategic advice, and financial resources to initiate, develop, and ensure the long-term success of carbon offset projects</li> </ul>		
	Carbon credit generation	Project developer	Design, implement, and manage carbon offset projects to achieve environmental goals and generate measurable carbon credits		
Carbon project	Advisory and support	Technical consultant Insurer	<ul> <li>Provide expertise in project design, monitoring, and compliance to meet technical standards.</li> <li>Offer risk management solutions to ensure project stability.</li> </ul>		
development	Monitoring and validation	Registries International agencies	<ul> <li>Record, track, and validate carbon credits, maintaining transparency and integrity in the carbon market.</li> <li>Establish standards and guidelines to uphold market integrity.</li> </ul>		
		TIC <sup>1</sup> players	Independently assess and confirm the accuracy of carbon credits.		
	Trading and market activities	Exchanges and brokers	• Facilitate carbon credit transactions through exchanges; brokers provide market access, price discovery, and execution support; buyers' direct purchase agreements.		
Carbon commodity		End-buyers	Source and purchase carbon credits to offset emissions, supporting projects that align with their goals		
trading	Compliance	Regulatory authorities Auditors Reporting Entities	<ul> <li>Enforce rules and standards to ensure fair trading practices.</li> <li>Independently verify transactions to ensure accuracy and regulatory compliance.</li> <li>Disclose relevant data on carbon trading activities to ensure transparency, accountability, and adherence to standards.</li> </ul>		

<sup>1.</sup> Testing, inspection and certification.

## Green technology is an estimated \$8m legal services market for lawyers

Estimated size of opportunities for Singapore-based lawyers (\$m) 2023-2033



#### Key:



#### Market drivers

- Innovations in sustainability are driven by several factors, including private funding, government initiatives, and regulation.
- Extensive venture capital funding has significantly advanced new technologies in Singapore, making it the hub with the largest volume of deals in Southeast Asia.
- Sustainability innovation is a key focus of Singapore's research and development efforts, with GreenTech expected to be widely adopted due to favourable government initiatives.

#### Legal service opportunities

- IP objection and objection response: Draft and review responses to examiners' objections on registrability of patents.
- IP strategy advisory: Oversee the organisation's IP portfolio, conducting IP due diligence, and monitoring IP-related deadlines to ensure timely renewals and filings.
- IP applications (e.g. trademarks and patents): Draft and prepare the applications for IP registration.
- IP licensing agreements: Negotiate specific terms of client engagements.

### Outlook



Legal involvement



#### **Summary of analysis**

#### **Market definition**

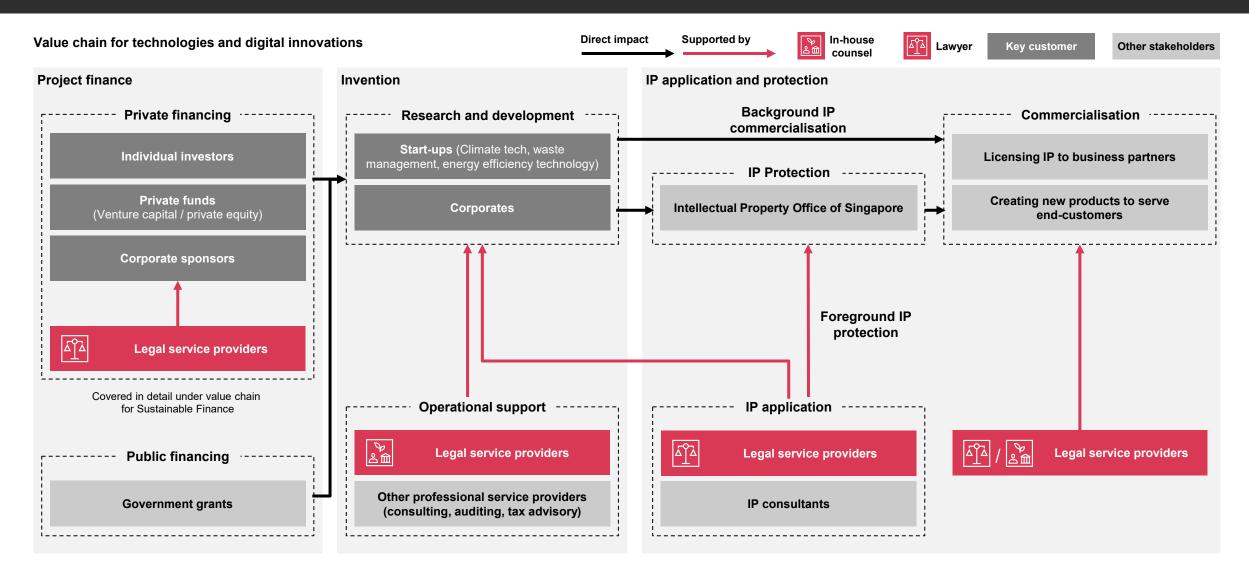
- This includes innovation to address environmental, societal and governance challenges such as promoting circular economy, energy efficiency solutions, reducing carbon emissions, ensuring sustainable food supply, and enhancing supply chain transparency.
- The green technology market is a standalone sustainability legal work.

#### Market size

- Estimated at \$8m in 2023, the market is projected to grow to \$12m by 2028 and \$17m market by 2033, driven by private funding and government initiatives as well as regulation.
- Legal opportunities include IP objection, IP strategy advisory, IP applications, and IP licensing agreements.

<sup>1.</sup> Legal service is involved in patent registration and objection handling, which requires precise drafting, therefore legal involvement is assessed as high.

## Lawyers can play a role across the green technology investment value chain



# Lawyers play a key role in protecting the intellectual property of new green technologies in the value chain

Value chain stages and activities		Breakdown of legal service, risk, frequency, and lawyers involved						
Stage	Activity	Key legal services	Foreign / local lawyers <sup>1</sup>	High risk <sup>2</sup>	High frequency <sup>3</sup>	Party involved		
Financing	Private financing	<ul> <li>Perform legal due diligence on potential investors to ensure they comply with sustainability standards.</li> <li>Negotiate, draft, and review contracts, including subscription agreements.</li> </ul>	Both	<b>~</b>	×	Lawyer		
	Public financing	Usually handled by in-house of regulators.	-	-	-	-		
Invention	Research and Development	-	-	-	-	-		
	Operational support	<ul> <li>Provide advice on incorporation and corporate structure.</li> <li>Draft and advise on employment and supplier contracts, focusing on IP assignments.</li> <li>Conduct contract drafting and review.</li> </ul>	Local	×	<b>~</b>	In-house		

# Lawyers play a key role in protecting the intellectual property of new green technologies in the value chain

Value chain stages and activities		Breakdown of legal service, risk, frequency, and lawyers involved						
Stage	Activity	Key legal services Foreign / local lawyers <sup>1</sup>		High risk <sup>2</sup>	High frequency <sup>3</sup>	Party involved		
	IP application	<ul> <li>File patents for environmentally sustainable technologies.</li> <li>Register trademarks for products and services.</li> <li>Advise on the legal aspects of entering new markets with sustainable technologies, including IP strategy.</li> </ul>	Local	<b>✓</b>	×	Lawyer		
	IP protection	<ul> <li>Develop strategies to protect trade secrets, including confidentiality clauses in employment contracts.</li> <li>Handle IP objections and responses.</li> </ul>	Local	<b>✓</b>	×	Lawyer		
IP Application and Protection	Licensing	<ul> <li>Negotiate licensing deals for sustainable technologies.</li> <li>Draft IP licensing agreements.</li> </ul>	Both	<b>✓</b>	<b>✓</b>	In-house/Lawyer		
	Product commercialising	<ul> <li>Ensure products meet regulatory requirements for market entry including product liability and performance standards.</li> <li>Advise on advertising laws to avoid greenwashing claims.</li> <li>Draft general terms of use and service level agreements.</li> <li>Draft distribution agreements that include sustainability performance metrics.</li> </ul>	Both	×	<b>✓</b>	In-house		

<sup>3.</sup> When the legal services are needed frequently in business operations, companies will generally opt to engage an in-house counsel to provide the work (especially if the legal risk is not too significant)



<sup>1.</sup> Whether the legal service can be only be provided by lawyers qualified to practice in Singapore due to regulatory limitations, knowledge of local laws and/or understanding of local context

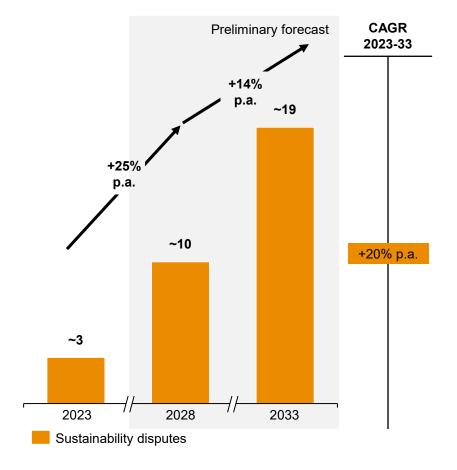
<sup>2.</sup> Companies prefer to engage lawyers when the legal risks are high

# Breaking down the key services across the stakeholders and professional service firms in the value chain

Value chain stages ar	Value chain stages and activities		Breakdown of professional service stakeholders and services involved in the value chain			
Stage	Activity	Other stakeholders and examples	Key professional services (excluding legal services)			
Financing	Private financing	Individual investors Private funds Corporate sponsors	<ul> <li>Provide seed and growth capital to develop green technologies, aiming for early access or generating returns.</li> <li>Corporate sponsors offer funding, strategic partnerships, market access, and industry expertise to accelerate sustainable innovation development, deployment and adoption.</li> </ul>			
	Public financing	Government and agencies	Public grants offer financial support to start-ups and corporations, incentivising green innovation and IP commercialisation.			
Invention	Research and development	Start-ups Corporates	Start-ups and corporations create new technologies, products, or processes to improve sustainability, reduce carbon footprints, or enhance energy efficiency.			
invention	Operational support	Professional services providers	Deliver auditing, consulting, and tax advisory services focusing on sustainability requirements, such as environmental regulatory compliance, gap assessments, and sustainability strategy.			
	IP protection	Government Agencies	Intellectual Property Office of Singapore (IPOS) manages IP registrations and administers IP rights in Singapore, including accepting applications, conducting examinations, and granting certificates.			
IP Application and Protection	IP application	IP Consulting firms	Advise start-ups and corporations on effective IP strategies, including portfolio management, patent drafting, applications, and negotiations with IPOS.			
11010011011	Licensing	Business partners	Start-ups and corporations can license their green technology IP to partners and earn royalty fees.			
	Product commercialising	Customers	Start-ups and corporations use their green technology IP to develop and launch new products for end-consumers.			

## Sustainability disputes are an estimated \$3m legal services market for lawyers

Estimated size of opportunities for Singapore-based lawyers (\$m) 2023-2033



#### 

#### Market drivers

- Growing sustainability business activities:
   As sustainability-related business activities expand, commercial disputes are expected to rise in Singapore.
- Rising regulatory scrutiny: Enhanced scrutiny and stakeholder expectations are likely to heighten the risk of greenwashing disputes.
- Global arbitration hub status: Singapore's status as a key global arbitration hub increases its likelihood of hosting sustainability-related arbitration cases.

#### Legal service opportunities

- Issue identification: Advise on dispute resolution strategies, draft legal submissions, and prepare clients for court or tribunal proceedings.
- Dispute resolution: Present arguments, negotiate settlements, and manage case strategy and client representation in legal forums.
- Award enforcement: Oversee enforcement of judgments or awards, address compliance issues, and handle disputes related to the enforcement process.

#### Outlook



#### Legal involvement



#### Summary of analysis

#### **Market definition**

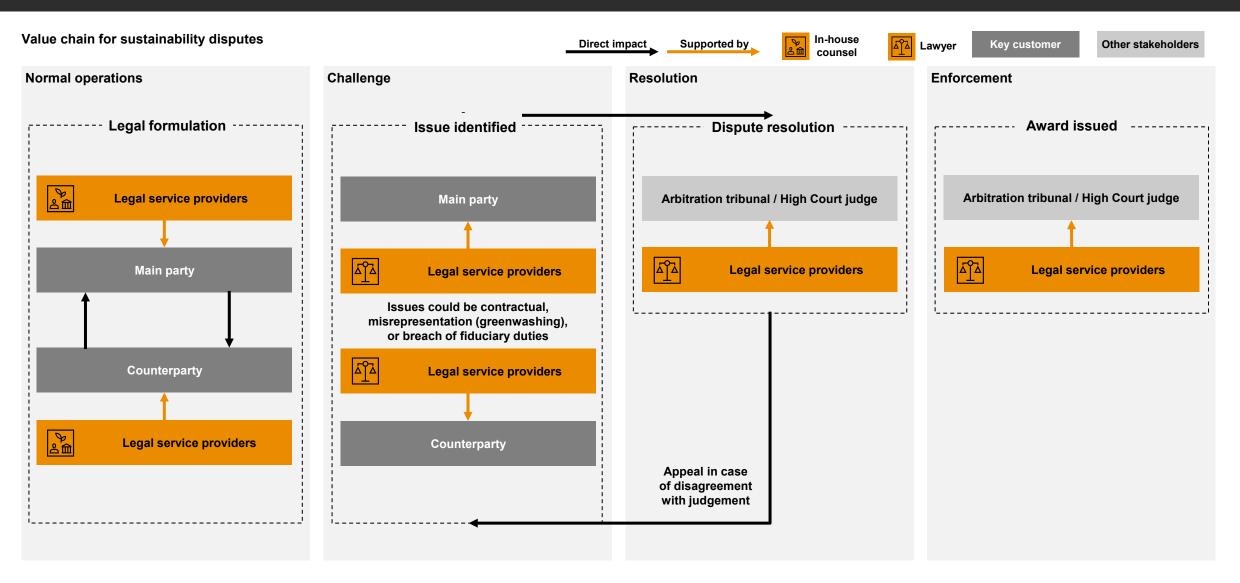
- This includes litigation in Singapore involving court cases concerning sustainability-related issues, and arbitration in Singapore addressing disputes related to sustainability matters through arbitration at the Singapore International Arbitration Centre.
- Sustainability dispute is a standalone sustainability legal work.

#### Market size

- Estimated \$3m in 2023 and is projected to grow into a \$10m market by 2028 and then a \$19m market by 2033 driven by increasing sustainability related business activities and greenwashing risks.
- Legal opportunities include issue identification, dispute resolution, and award enforcement.

<sup>1.</sup> Lawyers are involved once the dispute escalates, especially when they are escalated to dispute resolution institutions like SIAC or SICC.

### Lawyers play a key role in facilitating dispute resolution



## Lawyers are involved throughout the value chain of sustainability disputes

Value chain stages ar	nd activities	Breakdown of legal service, risk, frequency, and lawyers involved					
Stage	Activity	Key legal services	Foreign / local lawyers <sup>1</sup>	High risk <sup>2</sup>	High frequency <sup>3</sup>	Party involved	
Normal operations	Legal relationship formation	<ul> <li>Initiate engagement on breach or dispute.</li> <li>Negotiate, draft, and review contracts.</li> </ul>	Both	×	×	In-house	
Challenge	Issue identification	<ul> <li>Advise on dispute resolution strategy and resources.</li> <li>Draft legal submissions.</li> <li>Prepare for court or tribunal proceedings.</li> </ul>	Both	<b>✓</b>	×	Lawyer	
Resolution	Dispute resolution	<ul> <li>Present oral submissions before the tribunal or court.</li> <li>Conduct ongoing negotiations.</li> </ul>	Local <sup>4</sup> (Court) Both (Arbitration)	<b>✓</b>	×	Lawyer	
Enforcement	Award issued	Enforce local awards or judgments.	Local	<b>✓</b>	×	Lawyer	



<sup>1.</sup> Whether the legal service can be only be provided by lawyers qualified to practice in Singapore due to regulatory limitations, knowledge of local laws and/or understanding of local context

<sup>2.</sup> Companies prefer to engage lawyers when the legal risks are high

<sup>3.</sup> When the legal services are needed frequently in business operations, companies will generally opt to engage an in-house counsel to provide the work (especially if the legal risk is not too significant)

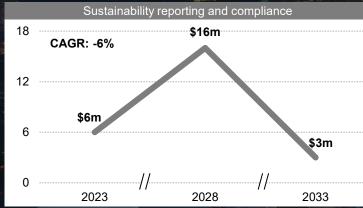
<sup>4.</sup> Local lawyers here also includes lawyers that are called to the Singapore Bar and are part of a Singapore law firm or an international firm with a Qualifying Foreign Law Practice License

# Breaking down the key services across the stakeholders and professional service firms in the value chain

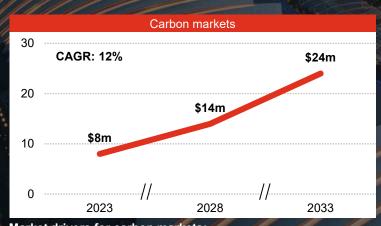
Value chain stages and activities		Breakdown of professional service stakeholders and services involved in the value chain			
Stage	Activity	Other stakeholders	and examples	Key professional services (excluding legal services)	
Normal operations	Legal relationship formation	Main party Counterparty	Companies, governments,	The main party and counterparty draft a contract outlining sustainability related responsibilities and obligations, setting the stage for potential disputes by defining terms and conditions.	
Challenge	Issue identification	Main party Counterparty	individuals and others may be either the main party or the counter party	<ul> <li>A dispute arises when the main party and counterparty identify a breach or disagreement over contract terms, initiating formal resolution procedures to address the issues.</li> <li>Disputes may involve contractual disagreements, misrepresentation of activities (such as greenwashing), or breaches of fiduciary duties to shareholders (e.g., failing to uphold sustainability objectives).</li> </ul>	
Resolution	Dispute resolution	Arbitration judge Litigation judge	Justices of the High Court, Justices of the Court of Appeal,	An arbitration or litigation judge reviews the dispute, conducts hearings, and evaluates evidence and arguments to reach a fair and impartial decision based on the contract.	
Enforcement	Award issued	Arbitration judge Litigation judge	arbitrators appointed by the parties, or from SIAC <sup>1</sup>	The arbitration judge or litigation judge issues a binding award or ruling, which is enforced by legal mechanisms to ensure compliance by both parties and resolution of the dispute.	



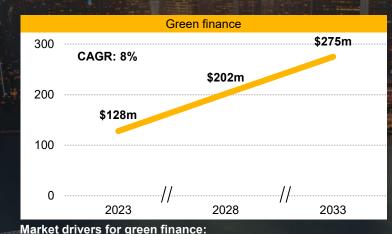
### Green finance and capital projects continue to lead legal services opportunities from 2023 to 2033



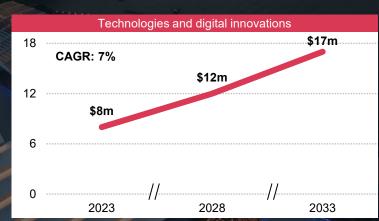
Market drivers for sustainability reporting and compliance: Regulatory requirements such as the Corporate Sustainability Reporting Directive (CSRD) and SGX-ACRA's climate-related disclosure.



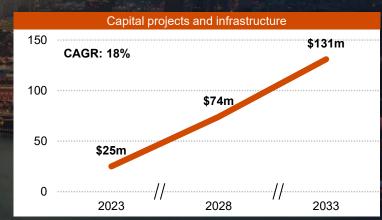
Market drivers for carbon markets: Regulatory push, increasing project investment, and growth of local carbon services ecosystem.



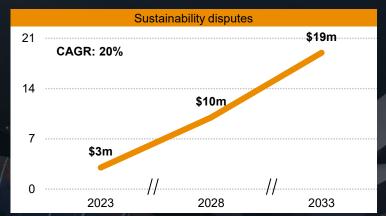
MAS regulations, sustainable debt, and investment funds integrating sustainability considerations.



Market drivers for technologies and digital innovations: Private funding, government initiatives, and regulation.



Market drivers for capital projects and infrastructure: Southeast Asia's renewable energy goals and Singapore's role as an infrastructure financing hub.



Market drivers for capital projects and infrastructure: Increasing sustainability-related business activities, rising regulatory scrutiny, and Singapore's status as a global arbitration hub.



## There are training gaps, competitive challenges, and cost challenges shaping the market for sustainability legal work



#### Market gap in sustainability legal training

- Interviews with the market reveal that while lawyers are familiar with sustainability
  concepts and are up-to-date with regulation, there is a gap in formal training that can uplift
  technical know-how.
- Clients are looking for technical knowledge combined with business acumen to advise on issues that will shape investment and compliance decisions.



#### International law firms' competitive edge

- As clients also make buying decision based on track record, international law firms in Singapore are able to lend credentials from sustainability legal practices in more mature jurisdictions like the EU and US.
- Singapore law firms may find themselves at a competitive disadvantage in comparison if they do not have the geographic and issue exposure that international firms have.



#### Buyers of legal service driven by cost

- As the sustainability agenda is still in its development phase, local clients' purchasing decision for sustainability legal services continues to be shaped by cost considerations.
- Sustainability compliance can often be seen as "cost-incurring", and may result in cost sensitivity amongst buyers when selecting professional service providers.



#### Nature of sustainability compliance work

- Law firms have a competitive advantage in areas that require the interpretation of regulations and standards in sustainability compliance work.
- However, they face competitive pressure in the broader realm of advisory and compliance work, where considerations including cost efficiency and track record or reputation can influence buying decisions.

## Critical success factors for building leading legal sustainability practice to capitalise on market opportunities

#### **Expertise in sustainability legal domain**

Leading firms from across the globe have built successful sustainability legal practice by developing:

- · knowledge of subject matter
- internal training programs to educate practitioners
- · structured tracking of regulations and standards
- thought leadership that establishes a point of view to share perspective
- sector-based knowledge through multidisciplinary teams.

#### Sustainability business acumen

Leading firms from across the globe have demonstrated business implications of sustainability by:

- proactively reaching out to clients and prospects about new developments in regulations and standards
- demonstrating the practical application of knowledge on how the new developments would shape business decisions for clients
- being up-to-date with best practices in complying with new regulations and standards.

#### Global and cross-border expertise

Leading firms from across the globe have built successful sustainability legal practices by:

- leveraging expertise and know-how from more mature markets like the EU and US
- cross-pollinating best practice and thought leadership content across the globe
- developing a hub and spoke approach for experts to be pulled into key pitches and services for key clients
- coordinating cross-border client engagements, leveraging key experts across the globe.

#### Sustainability practitioners' credentials

Leading firms from across the globe have built credentials of practitioners by:

- developing personal brand strategies for sustainability
- presenting thought leadership at seminars and conferences
- writing and publishing thought leadership papers in journals and media
- developing a proactive approach to sharing up-to-date newsletters on developments.

#### Industry-specific knowledge

Leading firms from across the globe have built industry-based approach to sustainability legal by:

- developing a multidisciplinary approach to key industries
- developing thought leadership content for those key industries as new developments in regulations and standards emerge
- developing deep understanding of industry-specific and business drivers that shape those key industries.

#### What Singapore law firms can consider doing

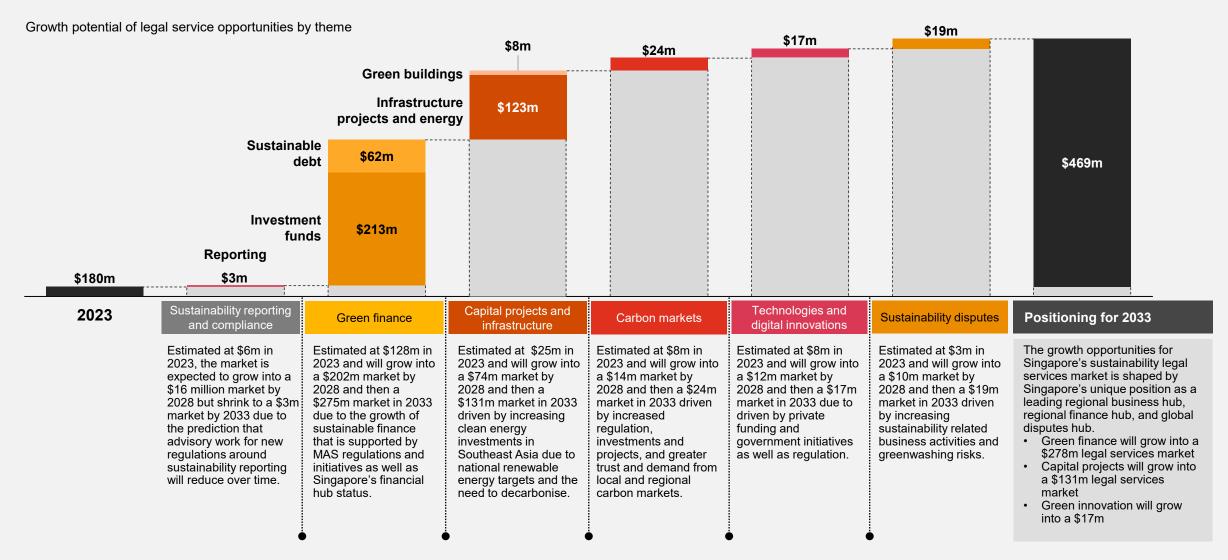
As Singapore law firms embark on the journey to develop a sustainability legal practice, it is critical to:

- develop a holistic and long-term strategic view
- develop deep knowledge and understanding of the issues and business implications for clients
- identify opportunities to collaborate with other professional service firms on thought leadership and pursuit initiatives
- develop a firmwide branding approach as well as invest in practitioner credentials and brand.

Source: Primary research interviews



## The growth opportunity from 2023 - 2033 for Singapore law firms is greatest in green financing and capital projects



### Market dynamics shaping opportunities for sustainability legal services

#### Geographical limitations restrict demand and supply

- Southeast Asia offers a wealth of opportunities for environmental sustainability initiatives, driven by the region's commitment to reducing emissions by about 32% by 2030.<sup>1</sup>
- These initiatives necessitate the utilisation of natural resources located in neighbouring countries. For instance, the number of industrial zones in the region are as follows: Singapore: 6; Malaysia: 247; Thailand: 67; Vietnam: 563; Philippines: 251; Indonesia: 118.<sup>1</sup>
- The abundance of industrial zones highlights the potential for energy and construction projects. While Singapore can play a crucial role in investment, the actual construction sites will be located outside of Singapore.

#### Singapore as a leading business hub

- Singapore is recognised by the Economist Intelligence Unit as the leading location for ease of doing business.<sup>3</sup>
- As a signatory to both the Madrid Protocol and the Patent Cooperation Treaty, companies in Singapore have the advantage of applying for multi-jurisdictional registration.
- Singapore boasts an efficient, effective, and robust infrastructure for IP application, commercialisation, and protection.
- The strengths of Singapore's IP regime, combined with the ease of establishing and conducting business, will create opportunities for legal work in the fields of technology and digital innovation.

#### Singapore as a leading finance hub

- Singapore is recognised as one of the top ten global financial hubs, hosting more than 200 global banks in Singapore.<sup>2</sup>
- In 2023, Singapore represents 14% of Southeast Asia's private green investments (Indonesia: 25%; Philippines: ~23%; Malaysia: ~16%; Thailand: ~6%; Vietnam: ~3%). This indicates significant potential for private market funds to be directed towards private green investments.<sup>1</sup>

#### Singapore as a leading international disputes hub

- While the use of Singapore law in cross-border contracts still lags behind EU or US laws, Singapore is a global hub for international dispute resolution, offering a suite of options such as the Singapore International Commercial Court (SICC), the Singapore International Arbitration Centre (SIAC), and the Singapore International Mediation Centre (SIMC).
- With the rise of sustainability projects, there is an expectation of an increase in sustainability related disputes however this might occur in the long run (5 – 10yrs).
- As an established dispute resolution hub with diverse options, Singapore is wellpositioned to capture these emerging sustainability disputes in both the short and long term.



- 1. Bain & Company. "Southeast Asia's Green Economy 2024." Report. Boston: Bain & Company, 2024. https://www.bain.com/globalassets/noindex/2024/bain report southeast asias green economy 2024.pdf.
- 2. Financial Centre Futures. "Global Financial Centres Index 28." London: Z/Yen Group, 2020. https://www.longfinance.net/media/documents/GFCI 28 Full Report 2020.09.25 v1.1.pdf.
- . Economist Intelligence Unit. "Singapore Retains Its Position as the World's Best Business Environment for 15 Consecutive Years." EIU Business Environment Ranking, 13 April 2023. https://www.eiu.com/n/eius-business-environment-rankings/.

## Opportunity for Singapore law firms to position for growth in green finance, capital projects, and green innovation

	\$270-280m Sustainability legal service market in 2033	\$130-140m Sustainability legal service market in 2033	Immediate term \$14-24m Sustainability legal service market in 2033	Longer term \$13-23m Sustainability legal service market in 2033	Longer term \$20-28m Sustainability legal service market in 2033	Longer term \$3-5m Sustainability legal service market in 2033
Sustainability themes	Green finance	Capital projects and infrastructure	Technologies and digital innovations	Sustainability disputes	Carbon markets	Sustainability reporting and compliance
Need for new knowledge	Medium	Medium	Medium	High	High	High
Timeframe of opportunities	Short term (1 to 3 years)	Short term (1 to 3 years)	Short term (1 to 3 years)	Mid to long term (3 to 10 years)	Mid to long term (3 to 10 years)	Mid term (3 to 5 years)
Top-up or standalone legal service	Top-up sustainability legal work driving growth	Top-up sustainability legal work driving growth	Standalone sustainability work driving growth	Standalone sustainability work driving growth	Standalone sustainability work driving growth	Standalone sustainability work driving growth
Market drivers	<ul> <li>Growth of sustainable finance has been supported by MAS regulation.</li> <li>More than 50% of assets under management have integrated sustainability considerations.</li> </ul>	<ul> <li>Southeast Asia's renewable energy goals are boosting annual clean energy investments.</li> <li>Singapore plays an important role as the region's infrastructure financing hub.</li> </ul>	<ul> <li>Singapore has a high concentration of venture capital funds that invest in new technologies.</li> <li>Sustainability innovation is a key focus of Singapore's research and development efforts.</li> </ul>	<ul> <li>Rising regulatory scrutiny and growing stakeholder expectations are likely to increase disputes.</li> <li>Singapore's status as a key global arbitration hub will position for sustainability-related arbitration cases.</li> </ul>	<ul> <li>Regulators are establishing carbon markets.</li> <li>Carbon offset project investment in Southeast Asia is growing.</li> <li>Singapore positioned to be the regional carbon service and trading hub.</li> </ul>	<ul> <li>The scope of sustainability reporting in Singapore is steadily broadening.</li> <li>Tighter EU regulations on sustainable practices are enforcing global supply chain compliance, affecting companies here.</li> </ul>
Legal service opportunities	<ul> <li>Bond issuance</li> <li>Fund structuring and operations</li> <li>Legal due diligence</li> </ul>	<ul><li>Regulatory compliance</li><li>Contract management</li><li>Financial agreements</li><li>Risk management</li></ul>	<ul> <li>IP strategy</li> <li>IP applications and objections</li> <li>IP enforcement</li> <li>IP licensing agreements</li> </ul>	<ul><li>Arbitration</li><li>Litigation</li></ul>	<ul> <li>Legal due diligence</li> <li>Contractual review and negotiation</li> <li>Compliance guidance and monitoring</li> <li>Carbon tax advisory</li> </ul>	<ul><li>Interpretation and advisory</li><li>Legal review</li><li>Scope 3 contract review and negotiation</li></ul>
Prioritising opportunities for Singapore lawyers <sup>1</sup>	1	2	3	4	5	6

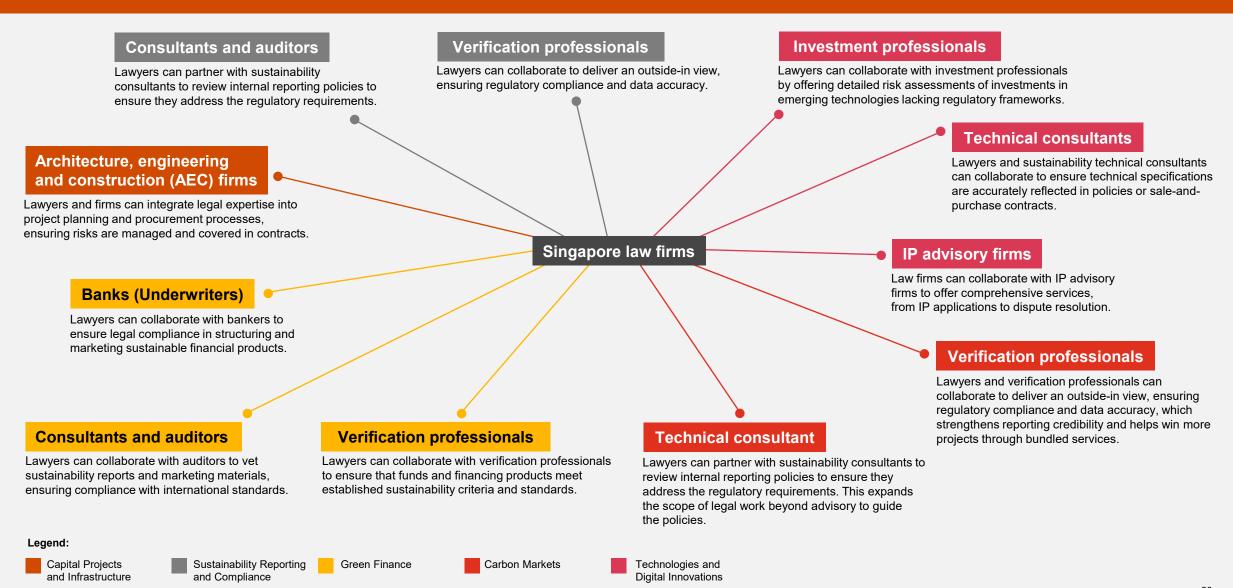
<sup>1.</sup> New knowledge includes the technical expertise and industry context that lawyers must acquire in the provision of sustainability legal services. This need is higher for standalone sustainability legal services that require comprehensive technical legal understanding compared to top-up sustainability legal work.

<sup>2.</sup> Opportunities are prioritised based on market size and the timeframe of the opportunity. Technologies and digital innovation is ranked ahead of sustainability disputes and carbon markets because of the much more immediate term of the opportunity as well as greater certainty in market drivers. In addition, sustainability disputes ranks ahead of carbon markets because of the greater uncertainty in factors that underpin the market (e.g. outlook of voluntary carbon markets in the region, as well as the establishment of standards for data transparency).

# Immediate opportunities in green finance, capital projects, and green innovation for Singapore lawyers

	\$270-280m Sustainability legal services market in 2033	\$130-140m Sustainability legal services market in 2033	\$14-24m Sustainability legal services market in 2033
Sustainability themes	Green finance	Capital projects and infrastructure	Technologies and digital innovations
Top-up or standalone legal service	Top-up sustainability legal work driving growth	Top-up sustainability legal work driving growth	Standalone sustainability work driving growth
Legal service opportunities	Bond issuance Lawyers perform due diligence to verify the issuer's financial health and legal standing, draft and review key documents including the bond prospectus and indenture, and advise on the structure of the bond offering.  Fund structuring and operations Lawyers advise on fund structure, draft and review offering documents, ensure compliance with sustainability regulations, develop internal policies and reporting standards, and provide ongoing legal support for fund operations, including investor relations and contract management.  Legal due diligence Lawyers conduct legal due diligence on the target company, draft and negotiate key documents, and oversee the closing process to ensure all conditions are met and transaction documents are finalised.	<ul> <li>Regulatory compliance</li> <li>Regulatory guidance: Provide guidance on sustainability regulations to ensure projects meet local and international standards, minimising impact and enhancing trust.</li> <li>Contract management: Draft and review contracts, Memoranda of understanding (MOUs), and agreements to ensure legal compliance, clarity of terms, and effective risk management.</li> <li>Risk mitigation: Identify and advise on legal risks in project planning, design, and feasibility to prevent liabilities and regulatory issues.</li> <li>Project financing and operations</li> <li>Financial agreements: Draft, review, and negotiate agreements for loans, bonds, and equity, aligning terms with legal standards and protecting interests.</li> <li>Structuring advice: Advise on corporate and financial structuring to optimise tax benefits, minimise liability, and ensure compliance for investment.</li> </ul>	IP objection and objection response Lawyers draft and review responses to examiners' objections on registrability of patents. Patent applicants have 5 months to submit a response addressing the objection raised by the patent examiners.  IP strategy advisory Lawyers are involved in overseeing the organisation's IP portfolio and intangible assets e.g. conducting IP due diligence, monitoring IP-related deadlines to ensure timely renewals and filings, handling legal correspondence.  IP applications (e.g. trademarks and patents) Lawyers draft and prepare the applications for IP registration, including responding to issues raised by the patent office.  IP licensing agreements Lawyers participate in negotiating specific terms of client engagements, provide advisory services on complex IP-related transactions, and endorse agreements resulting from conflict resolution negotiations.

## Cross-professions collaboration opportunities for law firms to capture opportunities in the area of sustainability services





## Potential for Singapore to be a leading regional sustainability legal hub

#### Goals for Singapore's legal service hub

It is crucial and advantageous for businesses, beyond just those in professional services, to consider sustainability as more than merely an expense. Although sustainability regulations can increase certain costs for companies, it is essential for Singapore to adopt a balanced approach to sustainability. This approach fosters trust in Singapore as a sustainability hub. Additionally, it benefits businesses by allowing them to engage in mature markets and access a wider range of funding sources.



Develop Singapore's sustainability legal service delivery capability



**Develop Singapore into a Centre of Excellence for sustainability legal services in the region** 



Singapore to lead regional sustainability frameworks and standards development, and align with those of mature markets



## How Singapore law firms can position for the \$450 million to \$500 million sustainability legal service market opportunities

The sustainability agenda is driven by consumers and regulators, shaping corporate agendas and fundamentally shifting the market. Singapore law firms stand to benefit from this growth as the sustainability legal services market is estimated to grow to \$450 million to \$500 million by 2033. By building up their capabilities, expertise and track record in the legal sustainability space as well as partnering with other professional service firms, Singapore lawyers and law firms will be better placed to capture and seize the growth opportunities identified in this study.

## Uplift capabilities and knowledge and strengthen market readiness

- Investing in lawyers' continuing education and development in sustainability credentials through further education and professional certifications.
- Participating in industry cross-professions collaboration on sustainability topic (e.g. Sustainability Apex Programme).
- Developing cross-professions thought leadership perspectives on new developments.
- Identifying potential cross-professions partnership for sustainability work (e.g. Ashurst and Aurecon alliance).



### **Boosting Singapore's position as a Centre of Excellence**

- Proactively reaching out to clients and prospects about new developments in regulation and standards to capture new work especially for clients with regional focus.
- · Developing law firm brand strategy for sustainability.
- · Presenting thought leadership at seminars and conferences.
- Writing and publishing thought leadership papers at journals and media.
- Developing proactive approach to sharing up-to-date newsletters on developments.



#### Aligning frameworks and standards

- Participate in industry consultations on clause and template development for standard setting.
- Encourage clients and law firms from other jurisdiction to adopt similar templates and frameworks.



PwC G

## How Singapore lawyers can position for the \$450 million to \$500 million sustainability legal service market opportunities

Singapore lawyers stand to benefit from the sustainability legal services market estimated to grow to a \$450 million to \$500 million mentment over the next decade. By investing in building sustainability capabilities and helping boost Singapore's position as a centre of excellence, Singapore lawyers will be well-positioned to lead in this new landscape. In the mid-long term, aligning Singapore's sustainability framework and standards with mature markets will help improve the exportability of Singapore lawyers' legal advice.

## Uplift capabilities and knowledge and strengthen market readiness

- Complete certified programmes and courses that offer specialised knowledge in sustainability. These programmes can provide a solid foundation and up-to-date insights, ensuring that lawyers are well-equipped to advise clients on complex sustainability issues.
- Keep up-to-date with developments through research papers from think tanks and universities.
- · Collaborate with technical experts to papers.
- Participating in secondment opportunities on sustainability legal matters (e.g. Ministry of Law and Law Society of Singapore's Legal Secondment Programme) as well as secondment opportunities with organisations that are at the forefront of sustainability initiatives can provide hands-on experience.



### Boosting Singapore's position as a Centre of Excellence

- Participating in industry engagement sessions with trade associations and chambers from hard-to-abate industries.
   These engagement opportunities will shed a light on how the industries could leverage legal service providers to better prepare for new regulation and standards developed.
- Working cross-professions to develop thought leadership perspectives on new developments.

#### Aligning frameworks and standards

 Participate in industry consultations on clause and template development for standard setting.





### Disclaimer

This publication has been prepared for general guidance on matters of interest only and does not constitute professional advice. You should not act upon the information contained in this publication without obtaining specific professional advice. No representation or warranty (express or implied) is given as to the accuracy or completeness of the information contained in this publication. To the extent permitted by law, the Singapore Economic Development Board, Ministry of Law, Enterprise Singapore, PricewaterhouseCoopers Singapore Pte. Ltd., and their respective partners, employees, and agents do not accept or assume any liability, responsibility, or duty of care for any consequences of you or anyone else acting, or refraining from acting, in reliance on the information contained in this publication or for any decision based on it.

# Market forecast limitations: As with any greenfield industry, there are risks and limitations pertaining to the accuracy of market forecasts

#### **Risks and limitations**

Forecasts are si	ubject to multiple external risks that are difficult to predict
Political changes	Our estimates may not capture the <b>impact of unexpected regulatory changes</b> , which can alter conditions and introduce new compliance costs.
	<ul> <li>Political instability, or conflicts in key regions can disrupt market operations and supply chains, leading to changes that cannot be predicted accurately.</li> </ul>
	<ul> <li>Sudden changes in trade policies, such as tariffs or trade agreements, can create market volatility that the model may not be able to fully anticipate.</li> </ul>
Macro- economic	<ul> <li>The model may not account for the cyclical nature of the economy, including recessions and booms, which may reduce spending on ESG targets.</li> </ul>
conditions	<ul> <li>Fluctuations in inflation rates and changes in central bank policies on interest rates can have significant effects on market conditions that the model might not fully incorporate.</li> </ul>
Technological risk	Changes in technology (linked to energy projects, IP protection) which cannot be reliably forecasted could impact the estimates (for e.g. if Solar projects are no longer popular in the future).
Underlying statistics	The model's reliability is contingent on the accuracy of the underlying market data used. While we have used the most reliable sources wherever possible, market forecasts can often be inaccurate due to unforeseen changes.

## Overall the availability and clarity of information regarding ESG law services has been relatively poor

Clarity of information	<ul> <li>Lack of accurate data tracking by market participants regarding the state of the market today makes it challenging to accurately estimate the opportunity today.</li> </ul>
Reporting and	<ul> <li>We limit our scope to the upcoming SGX-ACRA<sup>1</sup> regulations and CSRD<sup>2</sup>.</li> </ul>
compliance	<ul> <li>We limit our scope to 4 key regulations in the EU with the potential for additional regulations from the EU and other regions to emerge in the future.</li> </ul>
	<ul> <li>Includes only legal review and Scope 3 contract work; other tasks such as interpretation and advisory appear limited based on industry consultation hence have not been accounted for.</li> </ul>
Sustainable debt	<ul> <li>We focus entirely on SG-incorporated bonds and loans, though these should represent the majority of the market in any case.</li> </ul>
	<ul> <li>The assumption of legal fee per issuance might not be uniform across all issuances due to varying legal complexities.</li> </ul>
Sustainable funds	<ul> <li>We focus entirely on SG-incorporated investment funds, which should represent the majority of the market.</li> </ul>
	<ul> <li>Our simplifying assumption for the legal expense and legal fee per transaction might not be uniform across all funds / transactions given varying complexities.</li> </ul>
Energy projects	<ul> <li>Our approach does not account for the number of projects by technology due to the lack of detailed investment data, and instead assesses project investment at an overall clean energy level.</li> </ul>
Carbon markets	<ul> <li>We do not account for voluntary purchases by companies unaffected by carbon tax in Singapore, given the lack of offset incentives.</li> </ul>
	<ul> <li>We assumes no new exchanges will develop due to the absence of publicly available plans and established presence of exchanges like Climate-X.</li> </ul>

PwC 6

<sup>1.</sup> Singapore Exchange (SGX) - Accounting and Corporate Regulatory Authority (ACRA)

<sup>2.</sup> Corporate Sustainability Reporting Directive

## Thank you



At PwC, our purpose is to build trust in society and solve important problems. We're a network of firms in 149 countries with over 370,000 people who are committed to delivering quality in assurance, advisory and tax services. Find out more and tell us what matters to you by visiting us at <a href="https://www.pwc.com/sg/en.html">https://www.pwc.com/sg/en.html</a>